

PRIVACY POLICY

Latest update: August 25, 2021

Privacy Policy (hereinafter – **Privacy Policy**) applies to the personal data of users (hereinafter – **User, you, your**), which **Swiss Investment Century SA (Switzerland)**, (hereinafter – **the Licenser, we, our**) receive through the mobile app **CryptoCourse** (hereinafter – **App**).

The Privacy Policy is an integral part of the Terms of Use. Terms used in the Privacy Policy with a capital letter must have a meaning as defined in the Terms of Use.

1. WHAT DATA, FOR WHAT PURPOSE, ON WHAT BASIS WE PROCESS

1.1. When you create an Account, you provide us with the following data: **full name, e-mail, mobile phone number**. These data are used by us to identify you as an App user and to complete the Verification procedure.

1.2. During the Identification process, you must provide the following data: **full name, sex, date and place of birth, ID document series and number, ID number, address of residence**. These data are required by the internal procedures approved by the Cryptocurrency Exchange and the Bank, and we immediately transmit them this data for the Identification procedure. If you refuse to provide the personal data listed in this paragraph, you will be able to use the App, but you will not have access to the Functions, which, as required by law, is only possible after passing the Identification procedure.

1.3. When you use the App, we can process various data **about how you use the App**, including the addresses of the cryptocurrencies created in the App, their current balance, history of operations and so on. We process this data to form the transaction history in the App.

1.4. If you contact us for technical support or any other matter, we process all the information **you provide in your message**. This data is being processed to resolve the issue you have raised.

The data listed in pp. 1.1, 1.2, 1.3, 1.4 are processed on the basis of the «contract» (for the performance of the contract concluded with you (Terms of Use)) or for the conclusion of it.

1.5. We can collect data **on the device** you use to access the App, including the device model, operating system and version, unique device identifiers and mobile network information.

Such data are processed on the basis of a legitimate interest, which is that on the basis of this information we are able to effectively provide services to you (to maintain and control the proper operation of the App, to correct any errors in its operation, to improve the quality of services and your user interface). If the «legitimate interest» is not stipulated by the applicable law (in particular for residents of the Republic of Belarus), such data are processed on the basis of the «contract» (for the performance of the contract concluded with you (Terms of Use)).

1.6. Our partners can collect advertising identifiers of your device (**IDFA, GAID**) as well as **analytical information** about your use of the App. Generally, they do this with cookies files. More about what cookies are.

Such data are processed on the basis of legitimate interest, which is that we study your experience in using the App and then improve and refine the App according to your needs. If the «legitimate interest» is not provided for by the applicable law (in particular for residents of the Republic of Belarus), such data are processed on the basis of your consent (the term of consent is until the moment of its withdrawal).

1.7. We also use your **e-mail address** to send you advertising materials. You can refuse to receive advertising materials by pressing the button «Unsubscribe» in the received message or contact us directly. Note that you will still receive messages related to your use of the App. Also for the purposes of displaying behavioral advertisements (i.e., ads based on your preferences) we can use **advertising identifiers of your device (IDFA, GAID)**. You can refuse to use your data for such purposes by sending us a request.

Such data are processed on the basis of legitimate interest, which consists of offering you our best offers and opportunities. If the «legitimate interest» is not stipulated by the applicable law (in particular for residents of the Republic of Belarus), such data are processed on the basis of your consent (the term of consent is until the moment of its withdrawal).

2. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

2.1. You consent to the transfer of your personal data to third parties as described below. You recognize that we, as well as some of our third-party suppliers to whom we provide your data (including Third-Party Services), may be located in countries where personal data protection legislation may differ from your home country, granting a lower (or even inadequate) level of protection. You are aware of the risks of such transfers and expressly consent to such transfers and processing of your data outside your country, in countries where personal data protection legislation may differ from your home country, granting a lower (or even inadequate) level of protection.

2.2. Some of your personal data (as described in the Terms of Use and Privacy Policy) are processed by the Cryptocurrency Exchange and the Bank. Please note that the Cryptocurrency Exchange and the Bank process your data as part of their internal procedures and in accordance with the requirements of the applicable legislation.

The Cryptocurrency Exchange and the Bank have their own personal data processing policies and process personal data according to them. We are not responsible for their websites, functions, actions or policies. Please review the relevant personal data processing policies of the Cryptocurrency Exchange and the Bank before using our App. Using the App, you agree to their terms.

2.4. The App may also contain links to third-party sites (including crypto-exchangers, promotional materials, etc.). The Privacy Policy does not apply to the actions of such third parties. Such third parties have their own personal data processing policies and process personal data according to them. We are not responsible for their websites, functions, actions or policies. Please review the relevant personal data processing policies before providing them with any data. By using the functions of such third-party sites, you agree to their terms.

2.5. The App uses Google Analytics, a web analytics service. The service is provided by Google, Inc. Address: Google, Google Data Protection Office, 1600 Amphitheatre Pkwy, Mountain View, California 94043, USA. Google Privacy Policy is available by the [link](#). As a rule, Google Analytics handles your IDFA, GAID and other analytic data about the use of the App. You can also learn about Google's practice of

storing data by the [link](#). Standard Contractual Clauses ([Standard Contractual Clauses](#)) is used to transfer your data to Google.

2.6. We also have the right to transfer your personal data when we have reason to believe that (a) we are obliged to do so by law, or (b) if necessary to detect, prevent and suppress fraud and other illegal activities.

3. METHODS OF PROCESSING YOUR PERSONAL DATA

3.1. We have the right to perform any action or combination of actions with your personal data, including collecting, organizing, storing, altering, using, depersonalizing, blocking, distributing, providing, deleting personal data, in accordance with the Privacy Policy.

3.2. We don't sell your personal information, which means we don't exchange it for a cash reward.

3.3. We don't use automated decision-making. We also do not use your personal data to automatically assess aspects of your identity (automated profiling, profiling).

4. HOW YOU CAN MANAGE YOUR PERSONAL DATA

4.1. You have the following rights with regard to personal data:

a) right to information and access to your personal data (you have the right to request information on what personal information we have about you, how we use it, access and receive a copy of your personal data, including in a structured form in portable format);

b) the right to correct your personal data (if you feel that your personal data is inaccurate, you can ask us to correct them. In certain cases, you will have to repeat Verification and Identification);

c) the right to request restrictions on the processing of your personal data (in this case we will only be able to store your personal data);

d) the right to request the removal of your personal data (you can ask us to remove personal data if you withdraw your consent on the processing or consider such processing to be contrary to the applicable law, as well as in certain other cases. Please note that the removal of certain personal data may be prohibited by applicable law to us or Third Party Services, as a result of which we will be forced to refuse you);

e) the right to object to the processing of personal data (in some cases you have the right to object to the processing of your personal data, for example, if we are processing them on the basis of a legitimate interest);

f) the right to withdraw your consent if we are processing your personal data on the basis of your consent;

g) not to be subjected to decisions based solely on automatic processing;

h) the right to complain to monitoring bodies if you believe that your rights have been violated.

4.2. To exercise your rights, you can send us a request to an e-mail address support@cryptocourse.app.

4.3. Residents of the Republic of Belarus have the following rights with regard to personal data:

a) right to withdraw consent (if your personal data is processed with your consent, you can withdraw your consent at any time without giving reasons);

b) the right to receive information relating to the processing of personal data, containing proof of the processing of personal data, your personal data and the source of their receipt, the legal basis and purpose of the processing, the period of consent; The name and location of the authorized person and other information specified by law;

c) the right to request changes in personal data if they are incomplete or inaccurate; In certain cases, you will have to repeat Verification and Identification;

d) the right to receive information on the provision of information to third parties once a calendar year free of charge;

e) the right to demand to stop processing of personal data, including their removal, in the absence of grounds for processing personal data. If it is not possible to remove your personal data, we will take steps to prevent further processing of personal data, including blocking it, and notify you accordingly. Please note that we can refuse to stop processing and deletion of data if it is necessary for the stated purposes of processing it, as you will be notified.

4.4. In order to exercise the rights listed in paragraph 4.3. the resident of the Republic of Belarus must submit an application to us in writing or in the form of an electronic document. The application must contain: your full name, address of place of residence, date of birth, identification number or (in absence of that) the number of the identity document (if this information was given at the time of consent or data processing is done without consent), a statement of the essence of the claim, a personal signature or an electronic digital signature.

4.5. If you wish to file a complaint related to the processing of your personal data, please contact us first at support@cryptocourse.app and we will process your request as soon as possible.

5. DATA STORAGE

5.1. We store your personal data only for the time necessary for us to complete the purposes for which such personal data was received, and remove or depersonalize them (so that it is not possible to link them to a specific person, that is, such data are not considered personal data) after such goals have been achieved.

5.2. If you send us a letter asking us to delete the Account, then within 20 calendar days of receiving the letter we:

- a) delete or depersonalize your personal data;
- b) send to Third-Party Services (if applicable) the request to delete your personal data;
- c) we give you the opportunity to withdraw money (you can find more information about withdrawal in the Terms of Use);
- d) we notify you of the steps that have been taken.

5.3. Please note that we can retain certain personal data and other information for a longer period of time if this is necessary to comply with legal obligations, resolve disputes and ensure compliance with our agreements.

6. AMENDMENTS

6.1. We can amend the Privacy Policy at any time and will notify you of amendments by specifying the latest update date of the Privacy Policy, or by asking for your consent to such amendments (if required by the applicable law).

6.2. Any amendments shall take effect on the date of their publication or on your consent (if required by applicable law). If such amendments significantly affect your rights, we will notify you in advance of such changes.

6.3. If you do not agree with the current personal data processing conditions, including any amendments, you must stop using the App. If you need to contact us at support@cryptocourse.app to resolve issues related to your discontinuation of the App, including the removal of the Account and the withdrawal of funds.

7. CONTACT ADDRESS

If you have questions on your personal data protection, you can contact us at support@cryptocourse.app.