



Data Protection Policy

DATA PROTECTION POLICY

WHAT THIS POLICY COVERS

Your privacy is important to us and so is being clear and open about how we collect, use, and share information about you. This document is intended to help you understand:

- What information we collect about you
- How we intend to use any information that we collect
- How we share information we collect (or don't)
- How we store and keep secure any information we collect
- How you can access and control your information
- How we transfer information we collect internationally
- Other important privacy information

This Privacy Policy covers the information that we collect about you as a process of you using our services, or otherwise interacting with us, unless a different policy is displayed. AITrading, "we" and "us" refers to AITrading Technologies OU and any of our subsidiaries. We offer a range of trading-related services, including AI Analysis, Marketplace and other services. We refer to all of these products, together with our other services and websites as "Services" in this policy.

This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. If you do not agree with this policy, we politely suggest that you do not access or use our Services or interact with any other aspect of our business.

Where we provide the Services under contract with an organization (for example your employer) that organization controls the information processed by the Services. For more information, please see Notice to End Users below.

WHAT INFORMATION WE COLLECT ABOUT YOU

We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

Information you provide to us

We collect information about you when you pass KYC, interact with our websites, and when you input your details and information as part of using the Services we provide.

Account and Profile Information:

We collect information about you when you register for an account, create or modify your profile, set preferences, sign-up for email newsletters or use our Services. For example, you provide your contact information and, in some cases, payment information. You also have the option of adding a display name, profile photo, and other details to your profile information to be displayed in our Services. We keep track of your preferences when you select settings within the Services.

Content you provide through our products:

The Services include the AITrading products that you use where we collect and store content that you post, send, receive and share. We collect your data when you fill in information or when you speak to our customer services personnel. Our primary purpose in collecting your information is to help with a smooth and efficient service for you. Having your information allows us to provide the correct services to best suit your needs and make your experience quick and easy.

We collect the personal information we need to pass KYC checks including:

Name – so we can address you in any correspondence

Age – as our services have age limitations

Country of residence – some services we provide depend on your country of residence

Telephone number and email – so that we can contact you

Scans of supporting documents, including passport, utility bills, bank statements or references – to verify the information you provided to us

Crypto Wallet information – to identify payments coming from you

Content you provide through our websites:

The Services also include the websites owned or operated by us. We collect other content that you submit to these websites, which include any channels operated by us on social media or social networking websites. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.

Information you provide through our support channels:

The Services also include our customer support, where you may choose to submit information regarding a problem that you may be experiencing with a Service. Whether you speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you have and any other related information that would be helpful in resolving the issue.

Payment Information:

We collect certain payment and billing information when you make a token purchase, to enable us to charge you once the transaction is finalised. You might also provide payment information, such as payment card details, which we collect via secure payment processing services.

Information we collect automatically when you use the Services

We collect information about you when you use our Services, including browsing our websites, reading marketing emails, and taking certain actions within the Services.

Your use of the Services:

We collect and keep track of certain information about you when you visit and interact with any of our Services. This information includes the features you use, the links you click on and frequently used search terms. The information we collect about your use of the Services is limited to just the data we can see concerning how you interact with and use features in the Services, in addition to content-related information described in “Content you provide through our products,” above.

Device and Connection Information:

We collect information about the computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you access our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers. We collect and use your IP address and/or country preference in order to approximate your location so that we can provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services.

Cookies and Other Tracking Technologies:

AITrading and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality which enables us to recognize you across different Services and devices. We collect this information so that we can provide you with a better Service

experience, such as remembering your last search or being able to pre-fill your details on a form.

Information we receive from other sources

We receive information about you from other Service users, from third-party services, from our related companies, and from our business and channel partners.

Other users of the Services:

Other users of our Services may provide information about you when they submit content through the Services. For example, we may receive your email address from other people who use the Services, when they fill in details on a form in order to invite you to the Services.

Other services you link to your account:

We receive information about you when you link a third-party service with our Services. For example, if you create an account or log into the Services using your Google or Facebook credentials, in order to authenticate you, we receive your name and email address as permitted by your Google or Facebook profile settings. The information we receive when you link or integrate our Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.

AITrading Partners:

We work with a global network of partners and companies who help us market and promote our products, generate leads for us, and resell our Services. We may receive information from these partners, such as billing information, contact information, and what country you are in.

Other Partners:

We may receive information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners, who may provide us with information about your likes, dislikes, interests, your engagement with our Services and your engagement with online advertisements. We collect this information so that we can provide you with a better Service experience, such as being able to offer you the most relevant products.

HOW WE USE INFORMATION WE COLLECT

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific

purposes for which we use the information we collect about you.

To provide the Services and personalize your experience:

We use information about you to provide the Services to you, including to process transactions with you, authenticate you when you log in and provide customer support. We combine information about you and your activities to provide a seamless experience, such as to allow you to find information from one Service while searching from another, or to present relevant product information as you browse across our websites.

We are always looking for ways to make our Services smarter, faster, secure, integrated, and useful to you. We use collective learnings about how people use our Services, as well as feedback provided directly to us, in order to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Services. For example, to improve a certain feature, we analyze recent interactions of a number of people and how often they use the feature, to gather the most relevant information. We automatically analyze and aggregate frequently used searches to improve the accuracy and relevance of suggested products. In some cases, we apply these learnings across our Services to improve and develop similar features or to better integrate the services you use. We also sometimes test and analyze certain new features with a small group of users, before rolling the feature out to all users.

To communicate with you about the Services:

We use your contact information to send transactional communications via email and within the Services, including confirming your operations, reminding you for payments, responding to your comments, questions and requests, providing customer support, and sending you notices. We may also send you communications as you onboard to a particular Service to help you become more proficient in using that Service. These communications are part of the Services and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.

To market, promote and drive engagement with the Services:

We may use your contact details and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email and by displaying AITrading ads, aimed at you, on other companies' websites and applications, as well as on platforms like Facebook and Google. These communications are aimed at driving engagement and maximizing the value you get out of the Services, including information about latest deals that we think may be of interest to you. We may also communicate with you about new offers, promotions and contests. You can control whether you receive these communications as described below under "Opt-out of communications."

Customer support:

We may use your information to resolve any issues you may encounter, to respond to your requests for assistance and to improve the Services.

For safety and security:

We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

To protect our legitimate business interests and legal rights:

Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

With your consent:

We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

LEGAL BASES FOR PROCESSING (FOR EEA USERS)

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services.
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests.
- You give us consent to do so for a specific purpose.
- We need to process your data to comply with a legal obligation.

If you have agreed to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party have a legitimate interest to do so, you have the right to object to that use, but in some cases this may mean that you are no longer be able to use the Services.

HOW WE SHARE INFORMATION WE COLLECT

We share information we collect about you in the ways discussed below. To complete your booking we need your personal details including your name, address, email address, phone number and credit card number. In order to process the booking, we may in some instances pass all or some of this information on to our suppliers. This is done on your behalf through a password protected and encrypted secure site within a login environment. We will not sell or rent any personally identifiable information about you to any third party.

Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services.

Service Providers:

We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

AITrading Partners:

We work with third parties who help us improve the Services we provide to you. This help could be consulting, sales and / or technical assistance, to deliver improvements for you. We may share your information with these third parties in connection with the help they are giving to us, such as to assist with marketing and promotions. We may also share information with these third parties where you have agreed to that sharing.

Links to Third Party Sites:

The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website that you visit.

Social Media Widgets:

The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.

Third-Party Widgets:

Some of our Services contain widgets and social media features, such as the Facebook “like” button. These widgets and features collect your IP address, details concerning the page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it.

With your consent:

We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.

Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:

In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect AITrading, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

Sharing with affiliated companies

We may share or transfer information that we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information.

HOW WE STORE AND SECURE INFORMATION THAT WE COLLECT

Information storage and security

We use data hosting service providers in Switzerland, Estonia and Russia to host the information we collect, and we use technical measures to secure your data.

How long we keep information

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

Account information:

We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.

Marketing information:

If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us or ceased using your account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

HOW TO ACCESS AND CONTROL YOUR INFORMATION

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

Your Choices:

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. As below, we describe the tools and processes for making these requests. You can exercise some of the choices by logging into the Services and using settings available within the Services or your account. For all other requests, or if you require assistance, you may contact us via the details provided in the Contact Us section below.

Your request and choices may be limited in certain cases:

For example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we are permitted by law or have compelling legitimate interests to keep. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

Access and update your information:

Our Services give you the ability to access and update certain information about you from within the Service. For example, you can access your profile information from your account. You can update your profile information within your profile settings and modify content that contains information about you using the options associated with that content.

Deactivate your account:

If you no longer wish to use our Services, you may be able to deactivate your Services account by changing your account settings. Otherwise, to request assistance, please contact us via the details provided in the Contact Us section below. Please be aware that deactivating your account does not delete your information. Your information may remain visible to other Service users based on your past participation within the Services. For more information on how to delete your information, see below.

Request that we stop using your information:

In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe an account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us permission to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of any use of your information for marketing purposes by contacting us via the details provided below. When you make such requests, we will resolve it within 30 days of receipt. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honoured or the dispute is resolved.

Opt out of communications:

You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, or by contacting us via the details provided below. We will subsequently have your contact information removed from our promotional email list or registration database. When you make such a request, we will resolve it within 24 hours of receipt.

Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services. You can opt out of some notification messages in your account settings.

Turn off Cookie Controls:

Relevant browser-based cookie controls are described in our Cookies and Tracking Notice.

Data portability:

Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and any information that you created within the Services that are under your sole control.

HOW WE TRANSFER INFORMATION WE COLLECT INTERNATIONALLY

International transfers of information we collect:

We collect information globally and primarily store that information in Switzerland, Estonia and Russia. For the purpose of providing the Services to you, we may transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate. Whenever we transfer your information, we take steps to protect it.

International transfers within AITrading:

For the purposes described in this policy, in order to facilitate our global operations, we may transfer information to either Switzerland, Estonia or Russia and allow access to that information from countries in which we have operations. These countries may not have equivalent privacy and data protection laws to the laws of many of the countries where our customers and users are based.

OTHER IMPORTANT PRIVACY INFORMATION

Notice to End Users:

We are committed to protecting and respecting your privacy and not using your personal information for anything you have not agreed to. We take a proactive approach to security and privacy, and work to international standards and protocols. We are not responsible for the privacy or security practices of any other organization, which may be different than this policy.

Security of transactions:

Our secure server uses 128 bit encryption which ensures the highest levels of security. This is shown by the padlock in the closed position at the base of your browser screen. Any information, including credit card details, that you enter and submit on that page will be encrypted and securely transmitted. When your transaction is complete, your information is stored in an encrypted state. All information transmission is done using SSL (Secure Sockets Layer). SSL uses a cryptographic system that uses two keys to encrypt data; which are a public key, and a private or secret key known only to the recipient of the message.

Our policy towards children:

The Services are not directed to individuals under 18. We do not knowingly collect personal information from children under 18. If we become aware that a child under 18 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with any personal information, please contact our support services.

Changes to our Privacy Policy:

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will notify you by sending you an email notification. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways that you can help protect your own privacy.

If you disagree with any changes to this privacy policy, we politely suggest that you should stop using the Services and deactivate your account, as outlined above.

Contact Us:

This website is owned and operated by AITrading Technologies OU, trading as AITrading, a specialist in providing AT-based trading services.

If you have questions or concerns about how your information is handled, please inquire with us.

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