

PRIVACY POLICY

Last updated: 18th January 2022

PLEASE READ CAREFULLY THIS PRIVACY POLICY AS IT AFFECTS YOUR OBLIGATIONS AND LEGAL RIGHTS. Your rights and obligations when you use the Website (stampsdaq.com) are also defined (may be defined) by the following documents (agreements): Terms of Service; Disclaimer; any other terms we let you know about.

SECTION 1 – GENERAL CONDITIONS

Our Privacy Policy governs the privacy terms of using the Website (stampsdaq.com, hereinafter the “**Website**”), general rules of User’s Personal Data collection, processing, distribution, use and keeping by the Website Owner.

We follow all legal requirements to protect your privacy. Our Privacy Policy is a legal statement that explains what information of yours we will collect when you use the Website, how the information will be used, and how we will share and protect the information.

EACH USER MUST CAREFULLY READ AND COMPLY WITH THIS POLICY.

BY USING THE WEBSITE YOU CONFIRM THAT YOU AGREE TO THESE TERMS OF OUR PRIVACY POLICY. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY IN GENERAL OR ANY PART OF IT, YOU SHOULD WITHHOLD FROM USING THE WEBSITE. YOU ALSO AGREE THAT YOUR PERSONAL DATA, COLLECTED BY US, IS TRANSFERRED WITH YOUR CONSENT.

You provide and guarantee to us the right to process your personal data, including the right to perform the following actions to process your personal data (fully or partially in an automated system): storing, registration, changing, restoring, and removing. Also you agree that your personal data is included into our personal data base and any additional notification is not required.

SECTION 2 – DEFINITIONS

2.1. In this Privacy Policy the following terms have meanings as described in the Definition section below:

2.1.1. “**Website**” shall mean the website maintained at stampsdaq.com and/or all the subdomains of the website stampsdaq.com.

2.1.2. “**User**” (“**Users**”) means a person (individual) who visit and/or use the Website, or otherwise has an access to the functionality of the Website.

2.1.3. “**Personally identifiable information**” (hereinafter – “**Personal Information**” or “**Personal Data**”) shall mean any information that can be directly associated with a specific person and can be used to identify that person (including the information about your activities, such as information about your use of the Website, when directly linked to personally identifiable information, including automatically collected). We do not consider Personal Data to include information that has been anonymized so that it does not identify a specific User.

2.1.4. “**Controller**” means a person, which determines the purposes and means of the personal data processing.

2.1.5. “**Processor**” means a person, which processes personal data on behalf of the Controller.

2.1.6. “**Owner**” (“**Website Owner**”) or “**we**” (“**us**” or “**our**”) means a legal person (entity) – **STAMPSDAQ ESTONIA OÜ** (Harju maakond, Tallinn, Kristiine linnaosa, Keemia tn 4, 10), which owns the exclusive rights for the objects of intellectual property – the Website and/or built in content (except of users created content).

2.1.6.1. STAMPSDAQ ESTONIA OÜ is also a legal person, which determines the purposes and means of the processing of personal data and which processes personal data. Accordingly STAMPSDAQ ESTONIA OÜ is Controller and Processor in the meaning which is specified in paragraphs 2.1.4. and 2.1.5. of this Privacy Policy. However, there is also can be another person which processes personal data on behalf of STAMPSDAQ ESTONIA OÜ as a Controller.

2.2. The other terms and notions used in this Privacy Policy shall be understood in accordance with the Terms of Service (if available), unless other specified in this Privacy Policy.

SECTION 3 - INFORMATION WE COLLECT AND PROCESS

3.1. The User hereby expressly consents to provide to Us, immediately upon Our notice of request, any information (including Personal Data) that We deem to be required to maintain compliance with any law, regulation or policy.

3.2 Technical (programmatic) means of our Website collect such Personal Data: **first name; last name; e-mail; payment account; virtual asset wallet identifier or, if not applicable, a unique identifier of the transactions; personal identification code (if available); date of birth, if no personal identification code is available; place of birth, if no personal**

identification code is available; name and number of their identity document (passport, ID card); residential address. You (as a user) give your voluntary and undoubted consent for the collection and processing specified Personal Data and its transfer to third parties in order to ensure functioning of the Website and its appropriate work.

3.2.1. To maintain compliance with any law, regulation or policy, we reserve the right to request from you additional information so that we can verify your identity and/or address before permitting you to use our Website and/or acquire blockchain based tokens. We may also obtain information about you from third parties such as identity verification services and/or AML/KYC service providers.

3.3. The above mentioned information and documentation, described in paragraph 3.2., may be requested and or collected by us prior to activating your account on the Website and/or any services available through the Website. Any doubts as to validity, authenticity and genuineness of the documents and information, provided by you shall be considered a valid reason to deny your access to our Website and services.

3.4. The User, you hereby expressly consents, represents and warrants that any and all information provided to Us is valid, current, complete and accurate.

3.5. **Data Collected from all the Users, including non-registered Users.** We collect the data from running the Website and use information, provided to Us by you, sent to Us by your computer, mobile phone, or other access device, which may include the following data: your IP address, device information including, but not limited to, identifier, name, and type, operating system, mobile network information and standard web log information, such as your browser type, and the pages you accessed on our Website, time and date of your visit, time spent on the Website pages, other diagnostic data. You (as a user) give your voluntary and undoubted consent for the collection and processing specified data and its transfer to third parties in order to implement functioning of the Website and its appropriate work.

3.6. **We also collect and store such information as:** User requests in support regarding the work of the Website, its related services and other issues.

3.7. **We may use third party service providers to monitor and analyze the use of our Website and services.** Google Analytics is a web analytics service that Google uses to track and analyze website traffic and user behaviour. For more information on Google's privacy policy, please visit the Google privacy policy page: <https://policies.google.com/privacy?hl=en>.

3.8. **We also may use remarketing services for ads on third party websites after you visit our Website.** We and our third party vendors use cookies to inform, optimize and display ads based on your past visits to our Website. The Google Ads remarketing service

(AdWords) is provided by Google Inc. You can refuse from using Google Analytics for display advertising and customize Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads> Google also recommends installing a browser add-on to disable Google Analytics for your web browser: <https://tools.google.com/dlpage/gaoptout>. The browser add-on is used by Google Analytics and provides visitors with the option to prevent the collection of their data.

3.9. Cookies and similar technologies. When you access the Website or use Our services We (or Google Analytics or similar service provider on our behalf) may place small data files called cookies on your computer or other device. We use these technologies to recognize you as our User; customize our Website and advertising; measure promotional effectiveness and collect information about your computer or other access device to mitigate risk, help prevent fraud, and promote trust and safety. You may control the use of cookies within your internet browsers’ settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of our Websites and services may be impaired.

3.10. Types and purpose of “cookie files” that we use:

Type (category)	Application and purpose
Necessary cookies	<p>Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.</p> <p>This category of cookies in particular performs the following functions: Preserves the visitor's session state across page requests; Registers which server-cluster is serving the visitor (this is used in context with load balancing, in order to optimize user experience); Stores the user's cookie consent state for the current domain; Determines whether the visitor has accepted the cookie consent box (this ensures that the cookie consent box will not be presented again upon re-entry).</p>
Statistic and Functional cookies	<p>Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.</p> <p>This category of cookies in particular performs the following functions: Registers a unique ID that is</p>

	<p>used to generate statistical data on how the visitor uses the website; Used by Google Analytics to throttle request rate; Used to register how the user entered the website; Registers data on visitors' website-behaviour (this is used for internal analysis and website optimization).</p>
<p>Marketing and Targeting cookies</p>	<p>Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.</p> <p>This category of cookies in particular performs the following functions: Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers; Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites; Registers a unique ID on mobile devices to enable tracking based on geographical GPS location; Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user; Used to check if the user's browser supports cookies; Collects data on visitors' preferences and behaviour on the website (this information is used make content and advertisement more relevant to the specific visitor).</p>

3.11. YOU AGREE THAT YOUR PERSONAL DATA MAY BE PROCESSED AND STORED BY US OR OUR COUNTERPARTIES DURING THE PERIOD OF TIME THAT IS PRACTICALLY NECESSARY TO FULFILL THE AIMS AND PURPOSES THAT IMPACT WITH FUNCTIONAL PURPOSE OF THE WEBSITE.

SECTION 4 - HOW WE USE YOUR INFORMATION

We use the information we receive from you as follows:

4.1. We collect only the User's Personal Data that we need for their proper using of the Website and/or providing our services. In particular, we use your Personal Data to:

- administer our Website and/or provide services;
- provide the possibility and the function of users interaction via our Website;
- develop new products and services;
- personalize our Website for you;
- send you technical notices, support and administrative messages;
- communicate with you about products, services, promotions, events and other news and information we think will be of interest to you;
- monitor and analyze trends, usage and activities in connection with our Website and/or services;
- provide third parties with statistical information about our Users (but those third parties will not be able to identify any individual User from that information);
- verify compliance with the Terms of Service governing the use of our Website.

4.2. The Website Owner is the only data controller and processor, except for the cases when there is an objective Website Owner's need to process or store information at the Website Owner's counterparties or agents.

SECTION 5 – PERSONAL DATA PROTECTION AND STORAGE

5.1. The Website Owner will do any and all efforts and actions prescribed by Applicable Law to store any of your Personal Data in secrecy by means of, including but not limited to firewalls and data encryption, physical access controls to our data centers, and information access authorization controls (which are designed to comply with Applicable Law and regulations), authorization of access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities.

5.2. Personal Data of our users is stored and processed on servers in Germany. However, your Personal Data may be temporarily stored and processed in other jurisdiction, in particular in Estonia and Ukraine.

5.3. We reserve the right to store, process and transfer your Personal Data to our servers in various jurisdictions, where our facilities and/or our service providers are located. It may also be processed by staff operating who work for us and/or for one of our service providers. Staff may be engaged in the fulfillment of our services and/or the processing of your data and/or the provision of support services. By submitting your Personal Data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy.

SECTION 6 – THIRD PARTIES AND PERSONAL DATA DISCLOSURE

6.1. We may share your personal information with:

- service providers under contract who help with parts of our business operations;
- our banking partners;
- companies that we plan to merge with or be acquired by (should such a combination occur, we will require that the newly combined entity follow these terms with respect to your Personal Data);
- law enforcement, government officials, or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure; or we believe in good faith that the disclosure of Personal Data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of our policies;
- our Personal Data processing counterparties or agents, hired by or cooperating with us, whose services are required by us from the practical point of view;
- other third parties only with your prior consent or direction to do so.

SECTION 7 - INTEGRATING THIRD PARTY SERVICES AND LINKS TO OTHER WEBSITES

7.1. Our Website may, from time to time, contain links to and from the websites and/or mobile applications of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If you follow a link to any of these websites and/or mobile applications, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any Personal Data to these websites or use these services.

SECTION 8 - PROTECTING YOUR CHILD'S PRIVACY

8.1. Our Website is not designed for use by anyone under the age of 18 (and even over if the legislation of your jurisdiction provides acquiring the full dispositive legal capacity of a natural person over the age of 18), though we realize we may have a child attempt to use our Website. If you are a child, you should withhold from using our Website. If you are a parent or guardian and believe your child is using our Website, please contact us to remove your child's account. We reserve the right to ask you for verification of your relationship to the child before we honor such a request. However, as parent of a child, you should understand that you are legally liable for any transactions created by the child.

SECTION 9 - RETAIN INFORMATION

9.1. In accordance with applicable laws and as needed to provide services to our Users, we may hold your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain your Personal Data for as long as your account is active. Moreover, your Personal Data may be hold beyond the above mentioned period till it is indispensable for us to have relevant information to respond to any issues that may arise later.

SECTION 10 - SECURITY

10.1. We use relevant electronic and procedural safeguards to protect the privacy of the information you provide to us from loss, misuse, disclosure, alteration and destruction.

10.2. PLEASE NOTE THAT TRANSMISSION OF DATA OR INFORMATION (INCLUDING COMMUNICATIONS BY E-MAIL) OVER THE INTERNET OR OTHER PUBLICLY ACCESSIBLE NETWORKS IS NOT ONE HUNDRED PERCENT SECURE. WE STRONGLY RECOMMEND THAT YOU TAKE ALL POSSIBLE PRECAUTIONS WHEN USING THE INTERNET.

SECTION 11 - PRIVACY POLICY UPDATES AND AMENDMENTS

11.1. We reserve the right to modify or amend this Privacy Policy at any time. You should review this Privacy Policy frequently. Your continued usage of our Website shall mean your acceptance of those amendments and updates.

SECTION 12 - YOUR RIGHTS AS THE DATA SUBJECT

12.1. You as the personal data subject have all the rights in accordance with the provisions of the [General Data Protection Regulation \(EU\) 2016/679](#). If you are a resident of the European Union, you have the right to:

- Access, update or delete the information we hold about you.
- Correct your information if this information is inaccurate or incomplete.
- Object to our processing of your Personal data.
- Restrict the processing of your personal information.
- Transfer data. You have the right to receive a copy of your Personal data in a structured, printed format.
- Withdraw consent. You also have the right to revoke your consent at any time.

You also have the right to lodge a complaint to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority in the European Economic Area (EEA). We recommend you contact us to resolve all your questions and inquiries to the extent permitted by law, and we will reply promptly. The following paragraphs describe a way to implement some of your rights under the provisions of the General Data Protection Regulation.

12.2. ACCESS TO PERSONAL DATA

You have the right to access your personal information so that you can review what we have stored, as well as make corrections to your Personal data. **You can request access to your Personal data or make corrections by writing to us at the email address provided in the “CONTACT US” section.** If the information is not available or changed, we will inform you of the reasons for that. Please note that we may ask you to verify your identity before responding to such requests. Please mind that we will not be able to provide our Services without some of the required data.

12.3. DATA DELETION

How to remove (delete) your personal data? **You have the right to require deletion of your Personal data by sending us an email to the email address provided in the “CONTACT US” section.** We will process your request in accordance with applicable data protection laws. We may need to retain certain information for record-keeping purposes and/or to complete transactions that you began prior to requesting any deletion of Personal Data. **You also can revoke your consent to Personal data processing at any time.** In the event that you withdraw your consent to Personal data processing and we will have no legal basis to continue processing your data, we will stop processing your Personal information. If we have legal grounds for processing your information, we have the right to continue using Personal data within the limits provided by law.

SECTION 13 - CONTACT US

13.1. If you have questions regarding this Privacy Policy, please contact us at the contact information indicated below:

STAMPSDAQ ESTONIA OÜ

Harju maakond, Tallinn, Kristiine linnaosa, Keemia tn 4, 10

contact@stampsdaq.com

ANNEX №1 «SECURITY POLICY FOR TRANSFERRING PAYMENT CARD DETAILS»

When you paying for any of our services with a bank card, payment processing (including entering the card number) occurs on a secure page of the processing system. This means that your confidential bank card data (card details, registration data, etc.) is not processed by us. Such data processing is completely protected. When working with the payment card data, the information security standard (Data Security Standard (PCI DSS) developed by the international payment systems Visa and MasterCard is applied. Data Security Standard (PCI DSS) ensures secure processing of the details of the payment card holders.