

Privacy Policy

XX Platform respects your privacy and values its importance, and is wholly committed to keeping your information safe and secure. This Privacy Policy applies to the Website, Software and all the Services offered by XX Platform and/or its affiliates. This Privacy Policy is designed to assist you in understanding how we collect and use the information you provide to us that can be used to directly or indirectly identify an individual (“Personal Data”) collected through the use of our Website and/or Software and to assist you in making informed decisions when using our Website, Software and our Services. Please review this Privacy Policy before you use the Website, Software or any of the Services or features offered on or through the Website and/or Software. If you do not want your Personal Data to be used in the ways described in this Privacy Policy, then you should not access or use the Website and/or Software or use any of the Services. By using the Website, Software and its Services, you agree to be bound by this Privacy Policy. This Privacy Policy is an integral part of the XX Platform Terms of Service. For the purposes of this Privacy Policy, XX Platform defines the term “User” or “You” as a natural or legal person, either a visitor of the Website and/or Software or as User of the Services provided by XX Platform. The term “we”, “us”, “our” refers to XX Platform. If we, or a fraud prevention agency, determine that you pose a fraud, money laundering or other criminal risks, we may refuse to provide the Services you have requested, or we may stop providing existing Services to you.

Introduction

XX Platform is a multi-asset cryptocurrency wallet, the basic functionality of which includes storing, sending and receiving digital assets, exchanging digital assets to other digital assets and exchanging fiat currency to digital assets. As Software to be used through the access to the cryptoprocessing platform, API interfaces, mobile applications and any software services provided by the Software shall not allow accept, send or handle money, including but not limited to: national and/or foreign currency, etc. Software allows you to interact with the blockchain network in order to view and transmit information about the public cryptographic key.

Any information stored on the Website and/or Software is treated as confidential. All information is stored securely and is accessed by authorized personnel only. XX Platform implements and maintains appropriate technical, security and organizational measures to protect Personal Data from unauthorized or unlawful processing and use, and from accidental loss, destruction, damage, theft or disclosure. XX Platform does not require you to register or log in when you use our Wallet. XX Platform does not store your private keys, seed phrases, pass phrases, PINs and does

not have access to your funds. We do not use your camera images. Neither do we copy them to our servers. Camera images are only used for reading QR codes. We process your data in an appropriate and lawful manner, in accordance with the Estonian Personal Data Protection Act, as may be amended, and the General Data Protection Regulation (Regulation (EU) 2016/679). This Privacy Policy aims to ensure that you are fully informed on how we collect and process your Personal Data. This Privacy Policy applies to the extent that the XX Platform collects and/or processes Personal Data in the capacity of a data controller and uses the collected data in the capacity of a data processor. Secure Communication with Our Servers. All of our servers support HTTPS. Please ensure that HTTPS is present in the URL bar when accessing our Website. Third-party servers Exchange rates, balances, transactions and other blockchain information may be taken from or relayed to third-party servers. We do not bear responsibility for the security of your Internet connection.

1. The Information We Collect and Its Purposes

The following sections cover the specifics of each of the two groups from which data is collected: Website User and Software User. XX Platform collects Personal Data using different ways: a. Via the Website we may collect data which include: - Technical data, such as information about the device you use (mobile or desktop). - Usage data, which includes information about how you use the Website b. Via the Software we may collect data which include: - Technical data, such as information about the mobile device you use to access our Software including the operating system and its version, screen size, time-zone setting, geolocation of Your mobile application store. - Usage data, which includes information about how you use the Software. We use this information for our inner analytics only so that we can adjust XX Platform Services better to your needs. These details have an aggregated, anonymized form, and are not associated with your name, email or other personally identifying information. The source of the usage data is Google analytics tracking system. This usage data may be processed for the purposes of analysing the use of the Website and/or Software and Services and improving Users' experience, performance and future development of our Services. The legal basis for this processing is our legitimate interest for monitoring and improving our Website, Software and Services. When you create an Account you will be asked to provide: - e-mail address to communicate with you, allowing you to open and operate an Account with XX Platform, for marketing purposes. For example, by subscribing to our newsletter you will receive announcements straight to your email address; - phone number to be able to confirm that you are a certain User and to communicate with you; We will also ask you to provide some of the following documents to verify your identity: - Proof of identity (National ID (both sides)/International ID (double page)/Driver's License (both sides)) to perform our contractual obligations towards you, to provide you with our Services, for KYC and AML purposes; - Proof of Address (Utility Bill (issued within 3 months) Bank Statement (issued within 3 months) to perform our contractual obligations towards you, to provide you with our Services, for KYC and AML purposes; - Credit card information (including name, surname, date of birth, address) to perform our contractual obligations towards you, to provide you with our Services, to be able to execute your Orders. When you contact us via the support system, we use third-party provider Freshchat. Please carefully read Privacy

Policy of Freshchat using the following link before contacting our support team with requests. Depending on the Services you wish to use, we may additionally collect the following types of information: * Identity information, such as name, title, place and date of birth, gender, nationality, organization name and position, and information from photographic identity documents such as driver's license or passport information; * Contact data, such as address and e-mail, personal and business telephone details; * Financial and/or employment information including business activities and source of funds. If you ask us to provide you with specific legal services, we may also ask you for further information relating to your employment; * Details in respect of political exposure or any actual or alleged criminal convictions; * Information about the origin of your assets. Our Website is not intended for storing 'special categories' of personal data, such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health information. Links to other websites The Website and/or Software may contain links to websites maintained by third parties, whose information and privacy practices are different than ours. We are not responsible or liable for the information or privacy practices employed by such third parties. We encourage you to read the privacy statements of all third party websites before using such websites or submitting any personal data or any other information on or through such websites.

2. How We Collect User Data

We may collect personal identification information from Users automatically: As you use the Website, we collect certain technical data including your information about the device you use to access our Website and your usage habits, patterns and preferences. As you use the Software, will collect technical data including the operating system and version, screen size, time-zone setting, geolocation of your app store and your usage habits, patterns and preferences. We use Google Analytics to help us analyse User habits while visiting our Website and/or Software. The data gathered from cookies may be transmitted to Google servers in the European Union. The information will be used by Google only for the purpose of evaluating Website use, creating Website activity reports and other services relating to Website activity and internet usage on behalf of the XX Platform. We use the following cookies: - Google Analytics (Website analytics) - cs_lng (determination of language) - cookie_policy (your consent with the Privacy Policy) - visited_buy (notification operating) - hide_buy_notify (notification operating) You can remove cookies from your computer through the settings on your browser, but be aware that this may impact your ability to make use of some features on this and other websites. Management of cookie settings varies from one browser to another. During the process of creating the Account with XX Platform, Users provide information such as email address, telephone number (optional), image of the ID document, utility bill, credit card details and other relevant data. The Users data shall be collected and processed by a third party Company, who is a trusted partner of XX Platform for collecting and processing Users data on behalf of XX Platform. The Company is an experienced identity verification company that will process Personal Data for the purposes of the necessary KYC/AML procedures. The Company will obtain and process all the above stated Personal Data and run KYC/AML procedures and ensure the compliance with the relevant AML legislation.

For the purposes of maintaining Users' Accounts and reviewing Users for the purposes of KYC/AML compliance, XX Platform collects and processes the same data that The Company collects in the process of User verification (KYC) procedure. Marketing Upon receiving your consent, we may provide you with promotional messages and other information about products, events and Services of ours, our affiliates, notices and other information related to the Service and your interests. By selecting the checkbox "I agree to subscribe to promotional messages and other information about products and Services of XX Platform", you give your consent that we may send all such aforementioned materials and information to your email. You may unsubscribe from these messages anytime by selecting the checkbox "Unsubscribe from the promotional materials" and, as a result, you will no longer receive such aforementioned materials to your email. Please note, that even if you unsubscribe from our promotional messages, we may continue to send you service-related updates and notifications, or reply to your queries and feedback you provide us with.

3. How We Use Your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances: * Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. It means our interest to conduct and manage our business affairs appropriately and responsibly, to protect the reputation of our business, and to provide our Users with the best possible Services of the Website and/or Software with a secure experience. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). We will use your technical information to: - provide and make improvements to the Website and/or our Software, system maintenance, support, reporting and hosting of data, and troubleshooting; - ensure that the Website and/or Software are secure; - analyse how Users interact with the Website. We may also use any or all of the information above to administer and manage our business in general. If you feel that your interests and fundamental rights outweigh our business purposes, and that we should therefore stop processing your data, please let us know. * To perform the Agreement. It means processing your data where it is necessary for the performance of the agreement which you are a party of, or to take steps at your request before concluding an agreement. This includes our Terms of Services. * Marketing. Collecting Personal Data for marketing purposes, we are able to improve our services and expand the functionality offered. This is how we then decide which of our Services may be relevant or of interest to you. * When we need to comply with a legal or regulatory obligation. In certain circumstances, we may need to retain or use your data to comply with regulations and/or the law, especially AML laws and regulatory investigations. We will only retain these data for as long as is necessary to fulfill the purposes for which it was collected or to comply with legal, regulatory or internal policy requirements.

4. Transfer and share of information

We sometimes need to share Personal Data we process with third parties. In processing your transactions, we may share some of your Personal Data with third party service providers who help with our business operations. Your information will not be sold,

exchanged, or shared with any third parties without your consent, except to provide XX Platform Services or as required by law. By using our Services and accepting our Terms of Service, you agree to the disclosure of your Personal Data as described in this Privacy Policy. We may share your information with service providers under contract who help with parts of our business operations such as: cryptocurrency exchange service, cryptocurrency purchase, sell service payment service providers and analytics services. We ensure that any such third party is aware of our obligations under this Privacy Policy and our contracts prohibit them to sell or otherwise share your information with anyone else. We may share information with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of its own legitimate interests in compliance with applicable laws. We will only use and share your information where it is necessary for us to lawfully carry out our business activities e.g. with companies to be able to conduct transactions with clients. The legal basis for this data processing is our legitimate interest and our legal obligation. We will reveal User's Personal Data without their prior permission only when we have reason to believe, that the disclosure of this information is required to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to XX Platform or to others who could be harmed by the User's activities. We are permitted to disclose Personal Data when we have good reason to believe, that this is legally required and when the competent authorities have requested to present them with such Personal Data. We require all affiliated entities and third-party service providers to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow them to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our documented instructions.

5. International Data Transfers

We store your information primarily within the European Economic Area. However, some features and requirements of the Services may involve transferring your information to third-party service providers outside the European Economic Area when it may be necessary to process your transactions, subscriptions, purchases and/or trading activity: a. Provide the requested Services, b. Exercise and enforce our contractual rights and Terms of Service, c. comply with our legal and/or regulatory obligations or assert, file or exercise a legal claim We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission. In the absence of an adequacy decision, we will use specific contracts approved by the European Commission which give Personal Data the same protection it has in Europe.

6. How We Store and Secure Collected Information

For XX Platform Users all Personal Data is processed in the EEA. It has to be noted that XX Platform is a cryptocurrency wallet service and offers trading virtual currencies. Trading virtual currencies takes place on the blockchains (Ethereum, Bitcoin, etc.) which are decentralized database software platforms for virtual assets. Blockchains are a list of records, called blocks, which are linked and secured by means of cryptography. Each block typically contains a cryptographic hash of the previous block, a timestamp and transaction data. By design, a blockchain is inherently resistant to modification of the data. Data are

dispersed among nodes all around the world in encrypted version. If you trade virtual currencies, you agree that your Personal Data may be collected, stored, processed and that you will not be able to delete it or invoke the right to be forgotten. Your data are encrypted, meaning they are coded (anonymized). By trading virtual assets via XX Platform, you expressly agree to place your Personal Data on the (public) blockchain, that these data (even though encrypted) cannot be deleted and that Personal Data may be transferred outside European territory. XX Platform takes the security of the data that it collects very seriously. XX Platform has implemented a number of technical, organizational and administrative measures to ensure the confidentiality, integrity, availability and privacy of your Personal Data and to protect your Personal Data from loss, theft, unauthorized access, misuse, alteration or destruction, which are generally accepted by the industry to protect the Personal Data in its possession. You should never disclose your private keys, seed phrases, pass phrases, PINs and other means of authentication to unauthorized parties. We use certain security measures to help keeping your personal information safe, but we cannot guarantee that these measures will stop any users from trying to get around the privacy or security settings on the Website and/or Software through unforeseen and/or illegal activity.

7. Processing in Accordance with General Data Protection Regulation

The processing of Personal Data is performed in accordance with privacy policy and regulations following the EU Directive 95/46/EC of the European Parliament of 24 October 1995 (the Directive) and of the Council and the implementations of the Directive in local legislation. From May 25th, 2018, the Directive and local legislation based on the Directive will be replaced by the Regulations (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation (GDPR), and our processing will take place in accordance with the GDPR.

8. Retention and Deletion of Personal Data

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We will retain and delete your Personal Data as follows: a. Cookies cs_lng (determination of language), cookie_policy (your consent with the Privacy Policy), visited_buy (notification operating), hide_buy_notify (notification operating) will be removed in 1 year after your first visit to the Website. b. Your technical data will be stored in an aggregated, anonymized form without term's limitations. c. Contact data (e-mail address, telephone number) will be removed in 1 year after you close the Account. d. Identity information (proof of identity, proof of address) will be removed in 1 year after you close the Account and terminate legal relationships with XX Platform. e. Credit card information (including name, surname, birthdate, address) will be removed in 1 year after you close the Account and terminate legal relationships with XX Platform.

9. Minors

To use the Services, you shall be at least eighteen years old (18). XX Platform does not knowingly collect Personal Information from children under the age of eighteen (18). We do not process any Personal Information of children under this age. We reserve the right to

request proof of age at any stage so that we can verify that minors under the age of eighteen (18) are not using the Services. In the event that it comes to our knowledge that a person under the age of eighteen (18) is using the Services, we will prohibit and block such User from accessing the Services and will make all efforts to promptly delete or effectively anonymize any Personal Data stored with us with regard to such a User.

10. Your Rights

Your principal rights under the data protection law are: - Request access to your Personal Data. This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it if it is possible to identify the User. You may send an email to support@xyp.group requesting information as the Personal Data which we process. - Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where: a) there is no good reason for us continuing to process it; b) you have successfully exercised your right to object to processing (see below); c) we may have processed your information unlawfully; or d) we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. These may include instances where the retention of your Personal Data is necessary to: a) comply with a legal or regulatory obligation to which we are subject; or b) establish, exercise or defend a legal claim. - Request correction or rectification of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected and/or updated, though we may need to verify the accuracy of the new data you provide to us. As mentioned, it is to your interest to keep us informed of any changes or updates to your Personal data which may occur during the course of your relationship with us. - Object to processing of your Personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purpose. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal information that override your rights and freedoms. - Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: a) if you want us to establish the data's accuracy; b) where our use of the data is unlawful but you do not want us to erase it; c) where you need us to hold onto the data even if we no longer require it, as you need it to establish, exercise or defend legal claims; or d) where you have objected to our use of your Personal data, but we need to verify whether we have overriding legitimate grounds to use it. Request the transfer of your Personal Data to you or to a third party. We will provide you, or a third party you have chosen, with your Personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. - Request to withdraw your consent at any time where we are relying on consent to process your Personal data (which will generally not be the case). This will not however affect the lawfulness of any processing

which we carried out before you withdraw your consent. Any processing activities that are not based on your consent will remain unaffected.

11. Updates of the Privacy Policy

This Privacy Policy may be revised, modified, updated and/or supplemented at any time, without prior notice, at the sole discretion of XX Platform. Upon completion, we will post a notification on the main page of our Website, revise the updated date at the top of this page. We encourage Users to check this page regularly for any changes to stay informed on how we help to protect the Personal Data we collect. Each User shall acknowledge and agree that it is his personal responsibility to review this Privacy Policy periodically and become aware of modifications. By using our Website and/or Software, the User automatically signifies his acceptance of this Privacy Policy. In case the User continues the use of the Website and/or Software following the posting of amendments to this Privacy Policy, it will be deemed his acceptance of those amendments.

12. Information

If you have any further questions regarding the data XX Platform collects, or how we use it, then please feel free to contact us by e-mail at: support@xyp.group.