

# Polkadex Privacy Policy

Last updated on: 26/10/2022

## 1. Introduction

Protection of personal data is very important for us and we take it very seriously. This Privacy Policy, the principles of which Polkadex Inc (hereinafter “Polkadex”) follows, provides detailed information on the personal data collected by Polkadex about you, the purposes this data is used for and who has access to the data. Please take the time to read this Privacy Policy and feel free to contact Polkadex directly with any questions or suggestions concerning the Policy.

Like most companies, Polkadex collects data when you visit our websites <https://polkadex.trade/>; <https://orderbook.polkadex.trade/>; <https://tokenmanager.polkadex.trade/>; <https://orderbook-beta.polkadex.trade/>; <https://tokenmanager-beta.polkadex.trade/>. It is possible to visit our sites without leaving any identifying personal data for us. However, please be aware that we do use cookies on our websites that provide us statistical information. It helps us to analyse the behavioural patterns of the visitors of our websites and to improve user experience. If you want to buy our service from our websites or to get more information about it, then sharing your personal data with us is necessary.

We process personal data in compliance with applicable personal data protection laws, including the Regulation of the European Parliament and the Council (EU) 2016/679 (“GDPR”) as well as the Personal Data Protection Act of Estonia.

Polkadex respects your right to control your privacy. It is important for us that you can exercise your rights. Below you will find details on how to do this.

## 2. Terms and definitions

The Privacy Policy of Polkadex (legal name Polkadex Inc) is based on the General Data Protection Regulation (the “GDPR”). The Privacy Policy we apply must be clear and understandable to the visitors of our websites as well as to our contractual customers and to our partners. In order to ensure that all the parties understand their rights in the same way, we explain the most important terms here.

**Data subject:** Identified or identifiable natural person whose data is processed;

**Personal data:** Any information concerning an identified or identifiable natural person (“data subject”); identifiable natural person means a person who can be identified directly or indirectly, in particular on the basis of identifying attribute, including name, personal identification code, location information, network identifier, or on the basis of one or more physical, physiological, genetic, mental, economic, cultural or social characteristics of the natural person;

**Processing of personal data:** Automated or non-automated operation or set of operations, including collection, documentation, organizing, structuring, storing, customizing and

modifying, querying, reading, using, transferring, distributing, or making otherwise available, joining or combining, restricting, deleting or destructing of personal data or set of them;

**Controller:** Natural or legal person, public entity, agency or other body which alone or in cooperation with others determines the objectives and means of the processing of personal data; if the objectives and means of such processing are determined in the law of the Union or the Member State, the specific criteria for the Responsible Processor or for assigning the one may be established in the law of the Union or the Member State;

**Data processor:** Natural or legal person, public entity, agency or other body processing personal data on behalf of the controller;

**Recipient:** Natural or legal person, public entity, agency or other body to whom personal data is disclosed, whether or not it is a third party. The public entities which can obtain personal data as a result of specific inquiry in accordance with the law of the Union or the Member State, are not deemed to be recipients; these public entities process such data in accordance with applicable data protection standards in the basis of the processing purposes;

**Third party:** Natural or legal person, public entity, agency or body, excluding the Data Subject, Controller, Processor and persons who can process personal data under the direct responsibility of the Controller or Processor;

### **3. Data controller**

Company name: Polkadex Inc

Address: Craigmuir Chambers, Road Town, Tortola, VG 1110, British Virgin Islands.

E-mail: [gdpr@polkadex.trade](mailto:gdpr@polkadex.trade)

Website: <https://polkadex.trade/>

### **4. Types of personal data and purposes for processing**

#### **4.1. Providing services to the customers**

In order to enter into a client agreement with you, Polkadex processes the following personal data:

- email address;
- web3 public wallet address;
- Polkadex account address;
- trading account address;
- information about the financial transactions of the data subject;
- browser cache;
- private key of the trading account;
- user session details.

The legal basis for the processing of your personal data in this case is Art 6 (1)(b) in the GDPR.

## **4.2. Marketing**

Polkadex may use your email address to send you direct marketing via email. The legal basis for the processing of personal data in this case is Art 6(1)(a) in the GDPR - your consent as a data subject.

## **4.3. Compliance with legal acts**

In order to ensure compliance with applicable legal acts, Polkadex processes your IP-address. The legal basis for the personal data processing in this case is the legitimate interest of Polkadex to carry out geoblocking regarding geographic regions where Polkadex is not licensed to provide its services.

## **5. Recipients**

Polkadex discloses your personal data to its employees. This is done on a need-to-know basis. Polkadex discloses your personal data to its employees only when this is necessary to perform their obligations which are related to the functioning of the company. In certain cases, Polkadex may disclose your personal data to its co-operation partners who are providing services for Polkadex. These are services which are necessary for Polkadex to be able to provide services for you. For example, these co-operations may include IT service providers, accounting service providers etc. Polkadex discloses your personal data to its service providers and/or co-operation partners only when this is compliant with applicable data protection related legal acts. In most cases, these service providers constitute as data processors in light of the GDPR. In such a case, Polkadex discloses personal data to the entity only when the parties have signed a data processing agreement according to Article 28(3) in the GDPR.

## **6. Storage of personal data**

Polkadex only stores your personal data for as long as this is necessary for fulfilling the purposes of data processing outlined in clause 4 above. Polkadex does not store your personal data longer than is necessary. When storing your personal data, Polkadex abides by its personal data retention policy.

## **7. Security of personal data**

Polkadex has implemented appropriate technical and organisational measures to ensure the security of your personal data. In order to ensure the security of the personal data, Polkadex has also implemented relevant information security measures which are outlined in its internal policies. These internal policies are obligatory for all members of the organisation.

## **8. Rights of the data subject**

By contacting Polkadex by email at [gdpr@polkadex.trade](mailto:gdpr@polkadex.trade), you can exercise the following rights:

- The right to view your personal data;

- The right to correct your personal data;
- The right to delete your personal data;
- The right to transfer your personal data;
- The right that you will not be judged solely on the basis of automated data processing;
- The right to withdraw your consent.

In certain cases, you have the right to demand restriction for processing of your personal data and the right to object processing of your personal data.

You can exercise your rights in accordance with the terms and conditions based on GDPR and other local regulations.

If you believe that your privacy has been compromised, please contact us by the email address below. You also have the right to file a complaint to the data protection supervisory authority of the country of your residence.

With any questions, please feel free to contact us at [gdpr@polkadex.trade](mailto:gdpr@polkadex.trade).

## **9. Other**

If needed, Polkadex may amend this Privacy Policy. When Polkadex makes amendments to this Privacy Policy, Polkadex will submit the amended version to you to read and accept. The latest version of the Privacy Policy is always available [here](https://github.com/Polkadex-Substrate/Docs/blob/master/Polkadex_Privacy_Policy.pdf): [https://github.com/Polkadex-Substrate/Docs/blob/master/Polkadex\\_Privacy\\_Policy.pdf](https://github.com/Polkadex-Substrate/Docs/blob/master/Polkadex_Privacy_Policy.pdf)