

Privacy Policy

Effective from Aug 22nd, 2022

Dear User, we (“Polkadex” or “We” or “Us”) intend to provide seamless experience to our User(s) (“you” or “your”) while visiting our website <https://polkadex.trade/> (“Website”) and all our products and services including <https://orderbook-beta.polkadex.trade/> . We understand the importance of data privacy and value the trust that you hold in us by sharing your personal information for availing the products and services through our Website. This Policy outlines the reasons for collecting/storing all personal information and the data security standards for the collected data and applies to the Website and services provided by Polkadex.

This Privacy Policy for the Website and our products and services is updated periodically, shall be subject to any changes in future and will become effective as soon as the same is posted on the Website.

1. General Information

- 1.1.** The purpose of sharing the Privacy Policy with you is to keep you updated and informed about why we need any information from you, what information is being collected from you and how the information is used for providing the Services as indicated on the Website. The information provided under this policy shall be treated on an “as is” basis.
- 1.2.** This Privacy Policy will be governed by the data protection regulations and laws throughout the world. However, to avoid any conflict of interest and for the protection of individuals regarding the processing of personal data and for the free movement of such data, the primary law governing this Privacy Policy shall be that of the British Virgin Islands.

2. Collection and Processing of Data

- 2.1.** Any Personal Data or information collected by us is used for providing you with our products and services and any other additional features mentioned on the Website. However, we make sure to process only the necessary Personal Data and information ensuring that all necessary data security standards are met. “Personal Data” as described by Article 4 (1) of GDPR shall mean and include any information which is related to an identified or identifiable natural person such as the telephone, credit card or personnel number of a person, account data, number plate, appearance, customer number or address.
- 2.2.** For the purpose of providing our products and services, we may require you to share the following data with us:
 - 2.2.1. Email Address:** The email address of any User is collected by us for the purpose of:
 - 2.2.1.1.** Linking their Polkadex address with their email address.
 - 2.2.1.2.** Sign up and Login to the exchange to register the user’s Polkadex address and create proxy accounts to trade on the exchange
 - 2.2.1.3.** Validate if the right user is making the trade and prevent DDoS attacks
 - 2.2.1.4.** For receiving one time password (OTP) for verification of the email address.

2.2.1.5. For providing any newsletter or subscription services such as announcements (for any new features, changes to existing features, issues), sending monthly updates, token rates, offers, and marketing information to you on an ongoing basis.

2.2.2. Main Account Address (Blockchain): The blockchain account address of any User is collected for the purpose of:

2.2.2.1. To make trading available to the users.

2.2.2.2. To read the user account balance using which they intend to make a deposit to the proxy account and trade.

2.2.2.3. Users link their proxy accounts to this address and use the same for trading purposes.

2.2.2.4. Deposits, Withdrawals to and from proxy account

2.2.3. Financial Information: We collect the following financial information from any User:

2.2.3.1. User's Polkadex Network Address.

2.2.3.2. User's deposit and withdrawal transaction history from the main account of the User to the proxy account and vice versa.

2.2.3.3. Trading data such as open orders, order history and trade history.

2.2.3.4. Any fees associated with the transactions and paid by the User.

2.2.3.5. Funds information with which User can trade on the exchange.

2.2.4. Transaction Information: The Transactional information which is generated and related to the use of our products and services such as type of transaction, transaction amount and timestamp is collected from the User.

2.2.5. Browser Cache: The Browser cache collected from the User includes main account data, proxy account data of the users.

2.2.6. Correspondence: Any correspondence with the User such as User feedback, questionnaire, survey responses and any other information User provides to any support teams using messaging channels.

2.2.7. Online Identifiers: This includes the geo location or tracking details, browser fingerprint, operating system, browser name and version, internet protocol (IP) information of the User.

2.2.8. Cookies and other trackers: Cookies and other tracking tools are used to record User preferences and track the use of our services and interactions with the User.

2.3. The purpose of collecting the information from you is not only limited to providing our products and services to you, but to fulfill our legal obligations as well. As a part of the regulatory compliance for Anti Money Laundering (AML) regulations, we need your personal information to assess any fraud, money laundering or terrorism related risks. However, if we do not collect the data from you or you refuse to share the necessary information with us, we may not be in a position to provide you with the desired products and services, or which may lead to some parts of the services not functioning properly. Additionally, for regulatory purposes, we may need to monitor any transaction or history of transactions to assess any fraud, money laundering or terrorism related risks.

- 2.4. In case any information provided to us proves to be falsified, we may be forced to immediately terminate our relationship.
- 2.5. The collected data shall remain strictly confidential, and we shall abide by all necessary security standards for safeguarding the Personal Data shared with us.
- 2.6. The information as obtained by us in subclause 2.2 above, is necessary for:
 - 2.6.1. Providing our products and services to the User: We may use the information collected from the User to provide, personalize, maintain, and improve our products and services for the User. This information may be used:
 - 2.6.1.1. For creating and updating the User accounts.
 - 2.6.1.2. For processing of the transactions.
 - 2.6.1.3. To send information including confirmations, notices, updates, alerts.
 - 2.6.2. Security: We may use the collected information to maintain security measures for you and for us including the products and services provided by us for:
 - 2.6.2.1. Protecting, investigating and identifying any fraudulent, unauthorized or illegal activity conducted on the Website.
 - 2.6.2.2. For verification and identity of the User or to provide service access.
 - 2.6.2.3. For troubleshooting software bugs and any other operational problems.
 - 2.6.2.4. For compliance with applicable security laws and regulations.
 - 2.6.3. Research and development: The information collected from the User may be used for the purpose of research, testing, improvement and development of the product and services provided to the User.
 - 2.6.4. Legal and Regulatory compliance: The information collected by the User may be used for regulatory compliance purposes such as identification of the User against any public records or for investigation purposes.
 - 2.6.5. Direct Marketing: We may use the information collected by us for providing any newsletter or subscription services such as announcements (for any new features, changes to existing features, issues), sending monthly updates, token rates, offers, and marketing information to you on an ongoing basis.

3. Retention of Data

- 3.1. We ensure that the Personal Data collected and processed by us is only stored for as long as it is necessary to provide the products and services to you. However, we may retain your Personal Data beyond the necessity as indicated above in case any regulation or specific law demands us to store the data for longer than necessitated.
- 3.2. We store your Personal Data and information only after seeking your consent, and in case even if your consent is withdrawn, we may need to retain your data for processing it later for regulatory purposes.
- 3.3. The retention period for any Personal Data retained by us may be subject to change in future owing to any changes in specific regulations governing the retention of data.

3.4. Post the expiry of the retention period, your Personal Data and information may be deleted from our system or the same may be subject to any anonymity feature which prevents the Personal Data from being identified or associated with you.

4. Third Party Integration

4.1. For the purpose of collecting, processing, and analyzing the Personal Data, we may need to involve any third-party entities and tools. For us to provide you with the best user experience, we may share your personal information with our marketing partners for the purposes of targeting, modeling, and/or analytics as well as marketing and advertising.

4.2. The Services provided by us are limited to our technical expertise, we may need to integrate a third-party entity to our Website for sending out emails to you as a part of either the subscription Services or otherwise for providing various marketing related services. We use an industry standard third-party software called EmailOctopus to send emails on our behalf and EmailOctopus ensures to meet necessary data security standards for the protection of the User's Personal Data. However, Polkadex cannot be held responsible for any data that is used beyond the purpose of providing the Services as mentioned on the Website.

4.3. For the purpose of tracking the use of our website including the mobile applications and to collect information regarding the use of our products and services along with our interactions with you, we use tracking tools such as Google analytics, Firebase and AppsFlyer. The information may include your internet protocol (IP) addresses, browser type, location, operating system, device information and information regarding your communications with us. Ensuring the protection of the collected information lies with the tracking tools and Polkadex cannot be held responsible for any data that is used beyond the purpose of providing the Services as mentioned on the Website.

5. Cookies

Your Personal Data and information may be collected via cookies which are small text files stored on your device post seeking consent from you ("Cookies"). They help in remembering any information which may be necessary for us to provide you a seamless experience during any future visits. We also use Cookies and similar tools to enhance your user experience for providing our products and services and understand how Users can use our services for making further improvements. However, in case you do not want the Website to personalize the experience for the future visits, you can disable the use of Cookies technology through the options available within the Internet Browser. If you reject your consent to storing Cookies on your device or disable storing Cookies from your internet browser, you may still be able to access our Website, however, your access to certain features of the Website may be limited. Cookies help in remembering the User's login credentials as well, which makes it easier for you to re-enter the Website in future without much hassle and time.

6. User Rights for Collected Data

As a User, you have the right to access and control the Personal Data shared with us. The User can have the following rights with them for any Personal Data shared with us:

- 6.1. The User provides his/her consent to procure or collect data by us, which shall last either until the withdrawal of such consent by you or until the expiry of the minimum retention period when the relationship between us comes to an end. The User can refrain from consenting to share their Personal Data with us. However, in case you refrain from sharing the Personal Data with us, the access to certain features of the Website or services may be limited.
- 6.2. In case, the User has already consented to sharing Personal Data with us, the Website does have an option for removal of the User from the mailing list. Since we use a third-party software EmailOctopus for integration and marketing purposes, if the User no longer intends to avail such newsletters or ongoing updates, the User can avail various options for either unsubscribing or stopping such Services.

7. Data Security

- 7.1. We maintain technical, physical and administrative safeguards to ensure and avoid data breach of our Users and to protect the personal information shared by any Users with us. To secure your Personal Data shared with us, Polkadex as well as any third-party entity uses certain data security standards to secure the data from any breach by an outsider.
- 7.2. When the Personal Data is stored on the internal servers of the third-party entity, the third party ensures the security and safeguard of the infrastructure through standard data security services.
- 7.3. Irrespective of the data security standards mentioned above, no software or platform can guarantee 100% encryption or security of Personal Data and information. Therefore, we request you to take measures from your end as well in securing your Personal Data such as protecting your device from any viruses or bugs which can cause data breach.

8. Restricted Persons

This Privacy Policy shall not apply and extend to any persons or entities residing in, or are citizens of, located in, are incorporated or have registered office of the entity in the United States of America or in any Restricted Territory ("Restricted Persons"). We do not make exceptions, hence if you are a Restricted Person, you should not attempt to access our products and services. Any use of Virtual Private Network (VPN) for circumventing the restrictions imposed under this section is prohibited. The identification of any Restricted Person is done through geofencing which is an internet protocol (IP) based identification wherein Polkadex senses the IP address of any person or entity restricted for restricting the use of its products and services. During the geofencing, the IP addresses of any person or entity is not collected or stored by Polkadex.

9. Modification of Privacy Policy

The Privacy policy for the Website is updated periodically and shall be subject to any changes in future. The Policy will become effective as soon as the same is posted on the Website. However, for User's convenience, in case of any change to the Privacy Policy for the Website, the same shall be notified to the User via social media channels by Polkadex.