

Policy on Privacy and Personal Data Protection

Introduction

Scope of Application of this Privacy Policy

This Privacy Policy together with our Terms and any additional provisions that may be incorporated by reference into the Terms apply to your use of the Website, the App and any Service once you have accessed the Website or the App via a Device and any of the Services accessible through the App and on the Website.

Contents of the Privacy Policy

This Privacy Policy sets out the basis on which any Personal Data we collect from you or that you provide to us will be processed by us. Please read the following carefully to understand our practices regarding your Personal Data and how we will treat it.

Restriction on Collecting Personal Data of Specific Categories of Persons

The App, the Website and the Services are not provided to persons under the age of majority, as defined by applicable law in your country of residence or to any person that lacks the capacity to enter into a binding contract under the law of his/her country of residence.

Therefore, we do not knowingly collect information, including Personal Data, from the persons listed above, who are not legally able to use our App, Website and the Services.

If we obtain actual knowledge that we have collected Personal Data from a person listed above, we will promptly delete it, unless we are legally obligated to retain such data.

Contact us if you believe that we have mistakenly or unintentionally collected Personal Data of a child under the age of majority at info@mineglobal.ee.

Definitions

Company or We, us, our means MineGlobal OÜ, a legal entity, registered address: Harju maakond, Tallinn, Kesklinna linnaosa, Narva mnt 7-557, 10117, Estonia.

Account has the meaning stated in the Terms.

App has the meaning stated in the Terms.

Consent means your expressly demonstrated agreement by a statement or by a clear opt-in action with the Personal Data processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by means specified in Section 4 of this Privacy Policy.

Device means a mobile telephone or other handheld device.

GDPR has the meaning specified below in this Privacy Policy.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Operating Rules means the Terms, the Privacy Policy and this Cookies Policy. All of the Operating Rules listed herein shall be construed as one document. These documents can be published in different languages for localization purposes, but in case of any discrepancies between the English version and the version in a language other than English, the English version shall always prevail.

Privacy Policy means the privacy policy on privacy and data security which is available at info@mineglobal.ee

Personal Data means the information listed below in this Privacy Policy.

Performance of contract means processing your Personal Data where it is necessary for the performance of a contract with us to which you are a party or to take steps at your request needed for you to enter a contract with us.

User or You, your means a natural person accessing or visiting the Website or the App and using the Services provided by the Website or the App.

Website has the meaning stated in the Terms.

All terms used in this Cookies Policy that are not otherwise defined herein have the meanings set forth in the Terms

General Information

Applicable Law and Information We Provide to You

Our handling, processing and storing of your Personal Data is performed in compliance with the applicable laws, including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, GDPR), the Swiss Federal Act on Data Protection of June 19, 1992 (DPA) and its ordinances and other applicable laws (as may be amended).

Under the applicable laws, we are required to provide you with certain information about who we are, for what purposes and how we process your Personal Data, and your rights in relation to your Personal Data.

Giving the Consent

Before registering an Account with the App and/or the Website, you shall give the consent to our processing of your Personal Data according to the on-screen instructions.

IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY IN GENERAL OR ANY PART OF IT, YOU MAY NOT USE THE APP, THE WEBSITE AND THE SERVICES.

Consent Withdrawal

Once you give your consent during the registration of an Account via the App or the Website, you are free to c info@mineglobal.ee.

A consent withdrawal will not affect the lawfulness of any Personal Data processing carried out before you withdraw your consent.

Even if you withdraw your consent, we may still process your Personal Data under other grounds provided by the applicable law.

Who We Are

MineGlobal OÜ, as defined in this Policy and referred to as the Company, is the Personal Data controller. This means that the Company determines the purposes and means of the processing of your Personal Data.

The Company may process the Personal Data itself or transfer it to third parties for the processing. The list of such third parties is available in Section 'Personal Data Disclosure to a Third Party' of this Policy.

Complaints Processing Procedure

You have the right to make a complaint at any time to the supervisory authority for data protection issues of your country. We would, however, appreciate the chance to deal with your concerns before you approach the authority so please contact us in the first instance, whenever you are experiencing an issue concerning your Personal Data.

Privacy Policy Updates

This Policy may be modified by us from time to time, so check back often. So that you are aware changes have been made, we will adjust the “Last Revised” date at the beginning of this document. If we make a significant change in the way we process your Personal Data, you will be notified when you next start the App or access the Website. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App, the Website or the Services. Continued access to the Services by you will constitute your acceptance of any changes or revisions to this Privacy Policy.

Notwithstanding any requirements of the applicable law to the contrary, the updated version of the Privacy Policy will be effective from the moment of its publishing on the Website and in the App.

Personal Data that We Collect

We collect and process the following Personal Data of our Users:

- **Name and contact data**

We collect your email address and phone number and other contact data provided to us. We may collect your name and other information when you contact our support with regard to the Services.

- **Technical information**

We collect information about the device you use to access your Account, including the hardware model, operating system and version, and unique device identifiers, but this information is anonymized and not tied to any particular person.

We log login information about your use of the Services, including the type of browser and version you use, last access time of your Account, the Internet Protocol (IP) address used to register the Account and the most recent IP address used to access the Account.

This information does not reveal your identity (i.e. your name, address etc.).

- **Other collected data**

We may request access or permission to and track location-based information from your Device, either continuously or while the App is used, to provide location-tailored Services.

We may request access or permission to certain features on your Device (i.e. the Device storage, SMS messaging, social media accounts, reminders, contacts, calendar etc.).

We may request to offer your push notifications regarding the use of the App or the Website.

- **Information we receive from other sources**

We may acquire your Personal Data from various third parties and public sources. For example, we may purchase or otherwise acquire such Data from third party data suppliers. We reserve the right to merge or co-mingle this other Data with your Personal Data collected on or through the Services.

- **Aggregated Data**

We may also collect, use and share aggregated data, such as statistical or demographic data, for any purpose (Aggregated Data). Aggregated Data could be derived from your Personal Data but will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

- **Special Categories of Data**

We do not collect any special categories of Personal Data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

Personal Data Processing Grounds

Grounds for Processing Your Personal Data

We will only process your Personal Data when allowed by the applicable law.

More specifically, we will process your Personal Data:

- where you have given your consent;
- where we need to perform a contract we are about to enter or have entered with you, e.g. the Terms;
- 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;
- where we need to comply with a legal or regulatory obligation.

Direct Marketing

We will only send you direct marketing communications by email or text if we have your consent.

Disclosure for Marketing Purposes

We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

Personal Data Retention

We retain Personal Data in an identifiable format for the shortest amount of time necessary to fulfill our obligations under the applicable law and for our legitimate interest as defined by this Policy.

We may retain Personal Data in an identifiable format to perform our contract with you for the period of existence of respective contractual obligations. Even when the contract is terminated, certain contractual obligations may remain in force.

If your Account is deleted, we may erase your Personal Data and other information, but we reserve our right to retain and access the Personal Data for as long as required for our legitimate interest and/or to comply with applicable laws. We will continue to process and disclose such Personal Data in accordance with this Privacy Policy.

Personal Data Processing Purposes

To operate the Website and the App and provide the Services, including:

- to authenticate your access to an Account;
- to communicate with you about your Account, the Website, the Services, or the App;
- to create an account connection between your Account and a third-party account or platform;
- to compare information for accuracy and verification purposes;
- to keep your Account and information up to date;
- to manage our business needs, such as monitoring, analysing, and improving the Services, the App and the Websites performance and functionality. For example, we analyse User behavior and perform research about the way you use our Services;
- to manage risk and protect the App, the Website, the Services and you from abuse of the Services and fraud by verifying your identity;
- to comply with our obligations and to enforce the Terms, and comply with all applicable laws and regulations;

- to provide personalised Services (also called interest-based marketing) offered by us on third-party websites and online services. We may use your Personal Data and other information collected in accordance with this Privacy Policy to provide a targeted display, feature or offer to you on third-party websites. We may also process your Personal Data to tailor the marketing content and certain Services, App or Website experiences to better match your interests and other third-party websites;
- to respond to your requests, for example to contact you about a question you submitted to our customer service team.

Personal Data Disclosure to a Third Party

We may disclose your Personal Data to third parties in one of the following instances:

- when you gave us your consent to do so;
- when this is required to perform the contract concluded between you and us;
- when this is required by our legitimate interests as defined by this Policy; and
- when we are required to do so by law.

More specifically, we can disclose your Personal Data to our vendors, supplier, contractors, service providers or agents, who perform services for us and required access to such data to perform their obligations. Examples include: our professional advisors such as tax or legal advisors, consultants and accountants, for data analysis, research and surveys.

We may also disclose your Personal Data if we believe this is needed to protect our legitimate interests, including the need to investigate, prevent, or take action with regard to a (potential) violation of our Terms and other Operating Rules, or to prevent any harm to our Users.

Specifically, we will disclose your Personal Data to the following third parties:

- GETID OÜ (14700267), Maakri 30, 17th floor, 10145 Tallinn, Estonia, info@getid.com, +372 6052 555, KYC provider.

Personal Data Transfer to a Third Country

We are a Estonia company. Nevertheless, our servers are located in Germany and Netherlands. Consequently, your information may be transferred to Germany and Netherlands (or other third country) and be processed by us and by those third parties to whom we may disclose your Personal Data.

These third countries may lack the same level of Personal Data protection as your country of residence. Nevertheless, we ensure that transfers of Personal Data to a third country or an international organization are subject to appropriate safeguards.

Our safeguards include: Encryption using Bcrypt protocol.

Your Rights with Regard to Personal Data Processing

Under certain circumstances you have the following rights under the law in relation to your Personal Data. You have the right to:

- Request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of your Personal Data that we process and to check that we are lawfully processing it.
- Request correction of the Personal Data that we process. This enables you to have any incomplete or inaccurate Data we process corrected, though we may need to verify the accuracy of the corrected Data that you provide to us.
- Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no valid reason for us to continue processing it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information without compelling legal grounds, or where 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 communicated to you, if applicable, at the time of your request.

- Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and you disagree with such processing. You also have the right to object where we are processing your Personal Data for direct marketing purposes. Nevertheless, we may continue such processing if we can demonstrate that we have compelling legitimate grounds to do so that override your rights and lawful interests.
- 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:
 - if you dispute the Data's accuracy;
 - where your Data is processed without legal grounds but you do not want us to erase it;
 - where you need us to retain the Data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our processing of your Data but we need time to demonstrate our legitimate grounds to override your objection (if applicable).
- Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, 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.
- Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Contact Us

You can exercise any of these rights at any time by contacting us at info@mineglobal.ee

Legal Rights Disclaimer

We reserve a right to decline your request to exercise any of the rights under this Section if we are not legally bound to grant such requests under the legislation or the case law of the country of your residence.

Personal Data Protection Measures

We do our best to guarantee the safety and confidentiality of your Personal Data. We use physical, administrative and technical measures to prevent theft, leakage, unauthorized access to your Personal Data. Your Personal Data:

- is stored on publicly inaccessible servers;
- is encrypted (password protected);
financial information is transmitted only via SSL protocols;
- is available only to employees with appropriate access and is not accessible to the rest of our personnel;
- is constantly exposed to IT audits and vulnerability checks.

Safety during Transmission over Internet

Nevertheless, despite the caution and means of protection, you should know that we cannot be responsible for the safety of your Personal Data when transmitting / receiving over the Internet or wireless means.

Your Responsibilities Regarding Safety of Your Personal Data

You are responsible for the security of Personal Data through the creation of a strong password, its safety and inaccessibility to third parties. If you suspect a security breach of your data, you must inform us immediately.