

Vaulty - Privacy Policy
July-2022

# **Privacy Policy**

Last updated 05 - 07 - 2022

We respect and protect the confidentiality and privacy of our website visitors and our customers. This Privacy Policy (the "Policy") outlines our processes of collection and use of personal information that we collect through our website at www.vaulty.pro (the "Website") to provide you with our services.

By submitting personal information, you consent to the collection and use of your personal information, including any disclosures, processing, and transfers to third parties in accordance with this Policy. Any consent you provide is entirely voluntary. If you do not accept this Policy, you should not submit any personal information to us through this website or in connection with our services.

We may update this Policy at any time by publishing an updated version on our website including the effective date of the amended version. The new modified or amended Policy will be in force from the revision date.

# **Collection of personal information**

Personal information, also known as personally identifiable information (PII) and personal data, refers to information that can be used to identify, locate, or contact an individual, alone or when combined with other personal or identifying information. Examples of personal information include full name, date of birth, contact details, address, payment details, etc.

# (a) Direct collection of personal information

We collect personal information when you create an account, request a service, correspond with us, or engage in certain other activities on our Website. This information may include:

- (i) Identity information: full name
- (ii) Contact details: email address, phone number
- (iii) Identity document: e.g., national ID, passport
- (iV) Payment information: e.g., card details to make payments

## (b) Data collected from third parties or publicly available sources

We may receive and collect personal data about you from various third parties and public sources, such as online data searches, AML and KYC databases and service providers, public court databases, sanctions list, etc.

## (c) Automatically collected information

We automatically log certain information about visitor access to a website, which may include a visitor's internet protocol address, internet service provider, browser type, geolocation, cookie information, pages and content viewed, operating system, as well as date and time stamps. This information is used for general business analysis to understand website usage trends and performance.

## **Cookies**

We use cookies which are small data files stored on a visitor's computer or internet-enabled device that serve a number of purposes such as enhancing your on-line experience when visiting our website by remembering elections made, login details, other inputs. If you do not accept our cookies, you may not be able to fully experience some of our Website's functionality. After you finish browsing the website, it is possible for you to delete cookies from your system if you choose to do so. Further information about managing cookies can be found in your browser's help file or through sites such as www.allaboutcookies.org or www.cookiecentral.com. Please refer to our Cookie Policy for more information.

### **Sensitive Personal data**

We do not collect sensitive information such as political opinions, religious or philosophical beliefs, racial or ethnic origin, genetic data, biometric data, health data or data related a sexual orientation. Please do not send, upload, or provide us any sensitive data and contact us if you believe that we might have such information.

# **Data retention period**

Vaulty retains personal information for only so long as necessary for the intended purpose for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting obligations or to resolve disputes. Personal Information you provide during the account creation process will be retained for fifteen (15) months.

# Legal basis for processing personal information

Vaulty collects only the personal information necessary to provide you services or fulfill your requests. We may use this information in the following ways:

1. To comply with legal and regulatory requirements

We are required by the laws and regulations to collect and store certain personal information for providing services. This includes identification and verification of customers in order to comply with anti-money laundering laws across jurisdictions.

## 2. To provide our services

We process your personal information when you contact us to resolve any questions, disputes, or to troubleshoot problems. We use your data to detect, prevent, and mitigate fraud and abuse of our services.

3. To communicate our clients about our services and marketing activities We may send you information about your account, our services, inform you of relevant security issues or updates, or provide other transaction-related information.

We may send you marketing communications to inform you about our events and promotions.

(4) Other business purposes

We may use your information for additional business purposes. Any such use will be disclosed to you before we collect the information.

We process all data based on the following legal basis:

- (a) Performance of a contract: for the performance of our contractual obligations towards our clients.
- (b) Legal obligations: to maintain legal and regulatory compliance, detect and prevent any fraud activities.
- (c) Legitimate interests: for the purposes of safeguarding our legitimate interests so long as it doesn't outweigh your interests and fundamental rights.
- (e) Your consent: when you access our website and use our services, you consent to the collection, use, processing of your personal information in accordance with this Policy.

# Sharing and transfer of personal information

We do not sell our customers' personal information to third parties.

You may set your preferences or opt-out from receiving such emails.

We share your personal information with third parties only if such access is necessary for our legitimate professional and business needs, to provide you our services and carry out your requests. We share your information only with third parties who have a legitimate purpose for accessing it.

Third Party Service Providers: We may share your data with our trusted third-party service providers on a contractual basis to carry out certain tasks on our behalf: operate, maintain, and/or support our IT systems and IT infrastructure, our websites, manage our payments, manage our token accounting services, perform statistical analysis, provide customer support and perform other important services for us.

**Legal requirement:** We may be required to disclose your personal data by law, by a regulator or during legal proceedings, such as a court order, subpoena, and requests from government agencies. Note that we will not share your information unless the request is genuine and signed in writing.

**Company transfer/bankruptcy:** Company transfer could be in the form of a merger, acquisition, or consolidation between Vaulty and a third-party entity.

## Your rights

Depending on applicable law where you reside, you may have certain rights related to your personal information:

- (a) Access and correction: you have the right to request access to your personal data. This information will be provided without undue delay subject to a potential fee associated with gathering of the information as permitted by law. You are entitled to ask us to correct any inaccuracies in the personal information.
- **(b) Portability:** In certain circumstances, you may request to receive your personal information in a structured, commonly used, and machine-readable format, and to transfer your personal information directly to another data controller.
- **(c) Rectification of incomplete or inaccurate personal information:** If any of your personal information is incorrect, you may request to rectify such inaccuracies.
- (d)Object to processing: you have the right to object to us processing your personal information if we are not entitled to use it anymore.
- (e)Erasure: you have rights to have your information deleted, subject to applicable law.

You can make a request or exercise these rights by contacting us at info@Vaulty.pro and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards.

#### Transfer of data outside the EEA

During our business operations we may transfer your personal data to our partners, subsidiaries, affiliates, or service providers outside the EEA. When we transfer personal data to third countries, we endeavor to ensure that the transfer is lawful and adequate safeguards are implemented.

## **Third-party links**

Our Website may contain links to other websites, plug-ins and applications owned and operated by third parties. These third-party sites have separate and independent privacy policies. We do not control these third-party websites and have no responsibility or liability for their content and activities. When using third-party links on our Website, you should review the privacy policies of those websites to be informed regarding the personal information that they collect from you.

#### **Minors**

The website and our services are available to users that are 18 years of age and above. Vaulty does not intentionally collect information from anyone under the age of 18 through its website and services. If we become aware that a user who does not meet our age requirement submits

personal information to us, we will have their user account terminated without liability.

## **Data security and integrity**

Vaulty has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Despite our best efforts we cannot guarantee absolute security against all threats. Any access to your personal data is restricted on a need-to-know basis for our employees, contractors and agents who are subject to strict contractual confidentiality obligations.

#### Contact us

Questions, comments, or complaints about this Privacy Policy or data collection and processing practices can be emailed to info@Vaulty.pro

For, Terms Of Use - https://Vaulty.pro/assets/content/Vaulty\_terms\_of\_use.pdf

For, Terms Of Exchange -

https://Vaulty.pro/assets/content/Vaulty\_terms\_of\_exchange\_operations.pdf

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