

## CoinKYT LLC Privacy Policy

*Effective November 17, 2022*

This Privacy Policy is an offer of an agreement concluded by and between the **User** and the **Limited Liability Company "CoinKYT", INN (TIN) 9724089320/OGRN 1227700406042**, represented by General Director Elena Igorevna Votyakova acting in accordance with the Charter.

By using the website <http://CoinKyt.com> and/or mobile application/s for iOS or Android, any person accepts the terms of this Privacy Policy.

The use of the Website means following the link <http://CoinKyt.com>, including other domains and sub-domains, with the purpose of reading or viewing the materials of the Website or for downloading information, as well as completion of the registration procedure by filling out the appropriate form on the Website and sending it for processing by pressing the "REGISTER" button.

The use of Applications is understood as downloading and installing mobile application/s containing a trademark, commercial name and/or Company's name in one form or another to User's mobile devices.

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### 1. Defined Terms

⌘ **Company** – a party to this offer of an agreement, Limited Liability Company "CoinKYT", INN (TIN) 9724089320/OGRN 1227700406042

⌘ **User** – a party to this offer of an agreement. This may be any person who has the legal capacity to accept the terms of this Policy, according to the legislation of the Russian Federation, and who is the subject of Personal Data processing.

⌘ **Website** - <http://CoinKyt.com>, including other domains and sub-domains that belong to Limited Liability Company "CoinKYT", INN (TIN) 9724089320/OGRN 1227700406042.

⌘ **Applications** – mobile application/s for IOS or Android that belong to Limited Liability Company "CoinKYT", INN (TIN) 9724089320/OGRN 1227700406042.

⌘ **Personal data** — any information referring directly or indirectly to a particular or identified individual (personal data subject). Such information may include: full name; year, month, date and place of birth; address; information about marital, social, and financial status; information about education, occupation, and income; as well as other information that can be used collectively to identify the subject of personal data.

⌘ **Personal data processing** – any action (operation) or a combination of actions (operations) performed both automatically and manually with personal data, including collection, recording, arrangement, accumulation, storage, specification (updating, changing), extraction, use, distribution (including transfer), anonymizing, blocking and destruction of personal data

Other terms are used in this Privacy Policy in accordance with the meanings defined by the current legislation of the Russian Federation, unless otherwise expressly stated in the Policy.

## 2. General Provisions

2.1. This Privacy Policy defines the stance and intentions of the Company regarding processing and protection of Personal Data, in order to respect and protect the rights and freedoms of every person and, in particular, the right to privacy, personal and family secrets, protection of honor and reputation.

2.2. The User, through the use of the Website and Applications, provides the Company with Personal Data, while the Company ensures the use of the User's Personal Data in accordance with the legislation of the Russian Federation and on the terms defined by this Privacy Policy.

2.3. The purpose of personal data processing is:

⌘ analysis and monitoring of cryptocurrency transactions in the blockchain, providing solutions for compliance with anti-money laundering and risk management to exchanges, banks and financial institutions in accordance with the "KYC" (Know Your Customer) procedure;

⌘ communication with the User within the framework of the provision of services and the use of the Company's services;

⌘ conducting statistical research;

⌘ record keeping and compliance with regulatory obligations, for internal business purposes, such as maintaining documentation, fulfilling legal and tax obligations;

⌘ processing of the User's orders, transactions, cryptocurrency trades;

⌘ improving the quality of the Application and Website.

## 3. Categories of Personal Data

3.1. The Company received the User's Personal Data listed below in the following cases:

⌘ Name, address, e-mail address, company name, actions performed on the Website and in Applications, other contact details while using the Website.

⌘ Email address, name and surname, nickname, phone number and other contact details provided by the User when registering in e-mail client when processing letters and requests sent to the Company's email to [@coinkyt.com](mailto:@coinkyt.com) domain.

⌘ Information collected by the Company when using the Website and Applications.

The Company may collect technical information when a User visits Websites or uses the Company's mobile applications and services. This includes data such as the IP address, type of mobile device, operating system of the device and the type of browser, unique device identification, addresses of referring websites, customer journey map through the Company's websites and mobile applications, etc. The Company may also use technologies such as cookies, web beacons and mobile device identifiers to collect information about the use of the Company's websites and mobile services. Cookies enable the Company to provide Users with relevant information as they use the Company's websites and mobile services (for example, when opening and loading certain webpages). Web beacons show whether a certain page has been visited, whether an email has been opened, or whether advertising banners on the Company's Website and other sites have been effective.

The company uses this information to ensure operability of its websites and mobile applications, to improve the quality of services rendered, to correct errors and improve user experience in general. The Company does not seek to identify specific users of the Company's websites, mobile applications, and services.

⌘ Information on processing orders, transactions, cryptocurrency trades.

The Company also collects User data for processing orders, transactions, and cryptocurrency trades, as well as pricing and other information related to the User's order and transaction history.

In order to ensure access to transactions, cryptocurrency trades, and other deals involving digital assets, the Company is entitled to request that the User performs verification procedure that may include collection and processing, by means listed in section 3 of this Policy, of the User's Personal Data, including biometric data such as a photo, scanned copy of passport, a photo of the User with their passport, ID, a copy of a driving license. The Company may also request confirmation of the email address or phone number using SMS one-time password, a copy of the User's residence permit, a copy of the paid utility bill and other documents that make it possible to verify the authenticity of the Personal Data provided by the User.

The verification procedure may have several KYC access levels, depending on the value of trades/transactions made by the User.

The above-mentioned Personal Data is processed by the Company solely for the purpose of identifying the User and providing a safe space for transactions within the framework of the FATF programme on combating money laundering, financing of terrorism and financing of proliferation of weapons of mass destruction. Users' Personal Data is not disclosed to third parties, with the exception of the Company's affiliates, or at the request of state law enforcement agencies in accordance with the legislation of the Russian Federation and international treaties of the Russian Federation.

⌘ Information about the User's social networks, including the name in the social network (nickname), phone number, email address, sex, age, photo and other information provided in the User's personal account when registering in the social network.

The Company may have official accounts in various social networks.

Depending on the User's social network privacy settings, the Company may receive information from the social network provider. For instance, when the User follows the Company's activities on social media platforms, the Company can obtain personal data related to the User's profile on these platforms.

- 3.2. In order to provide certain services or while using certain software, the Company may collect other types of personal data and use such data for purposes other than the ones mentioned above that do not violate the purposes of processing Personal Data specified in Clause 2.3 of this Privacy Policy. The Company shall notify the User on the collection of Personal Data during registration for receiving a service or during software downloading.

#### 4. Procedure and Conditions for Processing Personal Data

4.1. The Company shall process the above categories of Personal Data using the following methods:

— Collection, recording, systematization, accumulation, storage, update, alteration, extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data with or without the use of automation tools.

4.2. The Company is entitled to receive User's Personal Data from other legal entities, partner companies, and affiliated companies that are part of the CoinKYT LLC group of companies, and process it using the above methods for the purposes that do not violate the purposes of processing Personal Data specified in Clause 2.3 of this Privacy Policy.

4.3. The Company has the right to transfer Personal Data without the User's consent if it is necessary for the implementation of a court ruling or ruling of another body or official, subject to implementation in accordance with the legislation of the Russian Federation on enforcement proceedings, at a reasoned request of a law enforcement agency or another state authority within its competence, as well as in other cases provided for by federal laws.

4.4. The Company shall process personal data only if at least one of the following conditions below is met within the specified time period:

	<b>Legal basis for personal data processing</b>	<b>Personal data processing period</b>
1	Consent of the subject of personal data to the processing of their personal data	Within the time period for which the consent to the processing of personal data is valid. By default, the period for which the User gives their consent to the processing of their Personal Data by using the Company's Website, Apps, and services is 5 years from the processing start date
2	Processing of personal data subject to publication or mandatory disclosure in accordance with the federal law	Within the time period specified in the relevant laws
3	Execution of a judicial act or an act of another body or official subject to execution in accordance with the legislation on enforcement proceedings of the Russian Federation	Within the time period required for the execution of the act
4	Participation of the subject of personal data in constitutional, civil, administrative, criminal, or arbitration proceedings	Within the period of the subject's participation in the proceedings, including the appeal period, except for cases when a longer personal data processing period is established by the current legislation of the Russian Federation
5	Execution of an agreement to which the subject of personal data is a party, beneficiary, or guarantor, or conclusion of an agreement on the initiative of the subject of personal data, or an agreement to which the subject of personal data is a beneficiary	Within the duration of the agreement except for cases when a longer personal data processing period is established by the current legislation of the Russian Federation

	or guarantor	
6	Exercise of rights and legal interests of the operator of third parties provided this does not violate the rights and freedoms of the subject of personal data	<p>Within the period required for the exercise of the relevant rights and legal interests</p> <p>The specific period is determined by the Company subject to the provisions of this Policy, the Company's internal documents and local regulations, the principles of personal data processing, and the requirements of the current legislation of the Russian Federation, including those that concern the termination of personal data processing when specific, predetermined, and legitimate goals of this processing are achieved</p>

4.5. The Company has the right to entrust personal data processing to third parties (processors) on the basis of agreements concluded with them. These parties include service providers who assist the Company in its activities: hosting service providers, customer contact centers, etc.

The processors undertake to comply with the principles and rules of personal data processing provided for by Federal Law No. 152-FZ on Personal Data (including Article 18.1 and Paragraph 5 of Article 18) and other laws and regulations. For each processor, the agreement shall specify:

- The list of processed Personal Data.
- The purpose of personal data processing.
- The list of actions (operations) with Personal Data to be performed by the processor.
- The processor's obligations to maintain confidentiality and ensure the security of Personal Data during processing, as well as the list of measures taken by the processor to ensure the protection of processed Personal Data, including the requirement to notify the Company of incidents with personal data.
- The obligation to provide the Company, at its request and within the validity period of the personal data processing agreement, with documents and other information confirming the adoption of measures and compliance with the requirements established by Federal Law No. 152-FZ.

The processor shall not be required to obtain the consent of the subject of Personal Data to the processing of their Personal Data. If the Personal Data subject's consent is required for the processing of Personal Data, it shall be obtained directly by the Company.

4.6. In cases established by the legislation of the Russian Federation, the Company is entitled to transfer Personal Data to third parties with or without entrusting them with the processing of Personal Data.

4.7. Unless otherwise stipulated by the legislation of the Russian Federation, the Company shall terminate the processing of Personal Data (for any of the above purposes) and destroy such data in the following cases:

- Company liquidation.
- Company reorganization that entails the termination of its activities.
- Expiration of legal grounds for the processing of Personal Data and/or achievement of the personal data processing goals.
- Withdrawal of the personal data subject's consent to the processing of their Personal Data

The procedure for the destruction of Personal Data on the media, including external/removable electronic media, paper media, and personal data information systems, shall be determined by the Company in its internal documents and local regulations.

## **5. Personal Data Subject's Rights**

5.1. The person/User whose Personal Data is processed by the Company shall have the following rights:

- The right to withdraw their consent to the processing of their Personal Data<sup>1</sup>.
- The right to receive information regarding the processing of Personal Data.
- The right to demand the correction, blocking, or destruction of their Personal Data if it

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<sup>1</sup> In accordance with Paragraph 2 of Article 9 and Paragraphs 4 and 5 of Article 21 of the Federal Law on Personal Data, the Company is entitled to continue the processing of personal data if other legal grounds apply.

is incomplete, outdated, inaccurate, illegally obtained, or not necessary for the stated purpose of processing, or to demand the termination of personal data processing if the purpose of processing is achieved by the Company.

Unless a different procedure for interaction between the Company and the User is specified in the relevant document (for example, an agreement or a written consent to the processing of personal data), in order to exercise the above rights, the subject of personal data shall send the Company a request in the form of an electronic document signed with an electronic signature at [support@coinky.com](mailto:support@coinky.com).

The request shall necessarily contain a description of the requirements of the subject of personal data, as well as the following information:

- Full name of the subject of personal data.
- The number of the main identity document of the subject of personal data or their representative, its date of issue and issuing body **OR** any other data that can be used to uniquely identify the subject of personal data.
- Information confirming the personal data subject's relationship with the Company **OR** information otherwise confirming the fact of personal data processing by the Company.
- Signature of the subject of personal data or their representative.

The subject of personal data is also entitled to appeal to the authorized body for the protection of the rights of personal data subjects (Federal Service for Supervision in the Sphere of Telecom, Information Technologies and Mass Communications) and to the court against the actions (inaction) and decisions of the Company that violate the personal data subject's rights when processing their personal data in the manner established by the legislation of the Russian Federation.

## **6. Company Guarantees**

6.1. When processing Personal Data, the Company shall:

- Take necessary and sufficient measures to ensure compliance with the requirements of the legislation of the Russian Federation and the Company's internal documents and local regulations on personal data.
- Take legal, organizational, and technical measures to protect personal data against unauthorized or accidental access, destruction, alteration, blocking, copying, provision, distribution, and other illegal actions in relation thereto.
- Appoint a person responsible for organizing the processing of personal data in the Company.
- Develop internal documents that define the Company's policy regarding the processing of personal data, local acts on the processing of personal data, as well as local acts establishing the procedures aimed at preventing and detecting violations of the legislation of the Russian Federation and eliminating the consequences of such violations.
- Familiarize the employees of the Company, its branches, offices, and departments directly involved in the processing of personal data with the provisions of the legislation of the Russian Federation and the Company's internal documents and local regulations on personal data, including the requirements for the protection of personal data, and train these employees.
- Conduct regular mandatory trainings for its employees on personal data protection.
- Exercise internal control and (or) audit of compliance of personal data processing with the requirements of the legislation of the Russian Federation and regulations adopted in accordance with it, other requirements for the protection of personal data, this Policy, and the Company's

internal documents and local regulations on personal data.

- Publish this Policy or otherwise provide unrestricted access thereto.
- Terminate the processing of personal data and destroy it in cases stipulated by the legislation of the Russian Federation. In case the User withdraws their Personal Data, the Company is entitled to suspend and/or terminate the provision of services, block and/or delete the User's accounts.
- Perform other actions stipulated by the legislation of the Russian Federation on personal data.

## **7. Responsibility**

7.1. The Company shall not be liable for actions of third parties in relation to the User's Personal Data if it was lawfully obtained. For more information, see the privacy policy of the relevant website.

7.2. The Company shall bear responsibility for the leakage of Personal Data in accordance with the legislation of the Russian Federation if it occurred through the fault of the Company.

7.3. The Company shall not be liable for actions of third parties in relation to the User's Personal Data outside of the jurisdiction of the Russian Federation. For more information, see the privacy policy of the relevant website.

7.4. The Company shall not be liable for the provision of deliberately false, inaccurate, or distorted Personal Data by the User and any legal consequences thereof.

## **8. Final Provisions**

8.1. This Policy shall be strictly enforced by managers and employees of all departments, branches, and offices of the Company.

8.2. This Policy shall apply to all personal data processed by the Company with or without the use of automation tools.

8.3. This Policy shall be accessible to any subject of personal data, including via the Internet.

8.4. The Company periodically updates this Policy and is entitled to change its terms at any time at its own discretion. The Company recommends regularly checking the Policy for possible changes.

8.5. Unless otherwise specified in the Policy, all changes made thereto shall come into force from the date specified in the upper-left corner of the 1st page of the Policy posted on the Internet at <http://CoinKyt.com>, or in the relevant sections of the Applications. The most current version of the Policy shall supersede and replace all prior versions.

8.6. In all matters not covered by this Policy, the Company shall be guided by the current legislation of the Russian Federation.

## **9. Cookie Policy**

9.1. The company respects the privacy of Users and strives to provide proper information regarding how you can manage your cookie files. This Cookie Policy is an integral part of CoinKyt Privacy Policy. It explains what are cookie files and similar technologies, what cookie types are set in User's devices when they visit the Website, and how the Company uses them.

This Policy regulates, among other things, the collection, processing, and use of cookies, web beacons, tracking pixels, and other tracking technologies when visiting the Website, the Website's mobile version or mobile application, as well as pages associated with them in order to help



customize the Website and improve user experience on our Website.

The Company reserves the right to amend this Policy at our discretion, while the User undertakes to track changes on the Website. We therefore recommend regularly revisiting this Policy for updates. In accordance with applicable law, we will ask you to update your consent to the use of cookies from time to time.

At this point, the User's consent to use cookie files applies to <http://CoinKyt.com/> domain (subject to update).

9.2. What are cookie files. In alignment with common practices on almost all professional websites, this Website uses cookie files or cookies that are tiny files set to User's computer in order to improve the performance of webpages. This document explains what information they collect, how we use it and why we need to store it. The User can avoid having this information collected or stored, but this may lead to downgraded performance or breakdown of certain website functionality elements.

9.3. How the Company uses cookie files. The Company uses cookie files for different purposes. Unfortunately, in most cases there are no standard industry-wide options to disable cookie files without completely disabling certain functions that they add to the Website.

9.4. Disabling cookies. Users can turn off cookies by changing settings in the browser that they are using (check your browser manual for instructions). Note that disabling cookies will affect the functionality of this and other websites that you visit.

9.5. Cookies that we set:

9.5.1. Cookie files related to User's account. When a User creates an account on the Website, the Company will use cookies to manage the registration process and for general administration. These cookie files are usually deleted once you log out of the system, but in some cases, they can be preserved to remember your website login settings

9.5.2. Cookie files related to system login. The Company uses cookies when you log into our system so that we could remember your login parameters. This way Users avoid having to log in every time they open a new webpage on the Website.

9.5.3. Cookie files related to sending newsletters via email. The Website offers newsletter or email subscription services, and cookies help us understand that the User has already registered and show relevant notifications to subscribed and not subscribed visitors.

9.5.4. Connected cookie files. When a User sends data using a form such as the ones with contacts or comments, cookie files can be configured to remember such User data for later conversation.

9.5.5. Website customization cookies. In order to customize the webpages according to the User's preferences and ensure great experience, the Company saves and analyzes information regarding navigation between pages through cookie files. The Company stores cookies in order to show Users relevant information whenever they interact with the website's pages.

9.6. Third-party cookies:

9.6.1. In certain particular cases, the Company also uses cookie files provided by trusted third parties and platforms. The following articles contain detailed information about third-party cookies that Users may come across on the Website.

9.6.2. The Website uses trusted platform Google Analytics, one of the most common and reliable solutions for web analytics. This platform helps understand how Users interact with the Website and how we can improve User experience. In this case, cookie files can track the amount of time Users spend on the Website and what pages they visit. Visit the official Google Analytics webpage to learn more about Google Analytics cookies.

9.6.3. The Company occasionally tests new features and makes small changes to the Website.

While testing new features, the already saved cookie files can be used regardless of changes to websites. This way the Company can add new functions that optimize and create new cookies.

9.6.4. The Company sells information products and services, and therefore it is important to receive statistical data regarding how many visitors to the Website actually make purchases.

9.6.5. The Company uses advertising to offset the costs of this Website's maintenance and provide financing for further development. The behavioral advertising cookies used by this Website are designed to ensure that we show Users the most relevant ads when possible by anonymously tracking their interests and showing similar products and services that may interest them.

9.6.6. Cookie files help the Company track and analyze the number of clients who are redirected to the Website through ad traffic from our partners that place our ads on their websites. Based on clicks and transitions, the Company can offer bonuses to affiliated accounts from our partners.

9.6.7. The Company also uses social network buttons and/or plugins on the Website that allow Users to connect to their social network in various ways. In order to make them clickable, social network websites set cookie files through the Website. Such social network cookies are used and operate in accordance with their respective privacy policies.

## **10. Contact Details**

10.1. Should you have any questions or doubts regarding the Privacy Policy related to our Website or Applications, please contact our customer support service at [support@coinkyt.com](mailto:support@coinkyt.com)

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