

PRIVACY AND USER DATA PROTECTION POLICY

SUMMARY

As a company promoting privacy awareness and compliance, we at Pecunio have created a Privacy Policy that aims to help you understand what data we collect, what we use it for and how you can exercise your rights. Reading a Privacy Policy is important so we hope you will give it time and attention.

Pecunio follows the following principles in order to protect your privacy:

- we do not collect more information than is necessary;
- we do not use your data for purposes other than those specified;
- we do not keep your data if it is no longer needed;
- we do not spread your data to third parties.

INTRODUCTION

Pecunio Blockchain Technologies FZE ("Pecunio"), a company limited by shares duly incorporated in the United Arab Emirates (UAE) with company license number 4822 and with its registered office at Business Center Al Shmookh Building, UAQ Free Trade Zone, Umm Al Quwain, UAE, owns and operates pecun.io, a website where users can buy and sell digital assets. This Privacy Policy describes the information we collect from you via the Platform and what happens to that information. This Privacy Policy applies to all sites under the pecun.io domain and the Pecunio brand. If we make any material changes to our privacy practices, we will post a revised Privacy Policy on this page or we may contact you. If you have any questions, please contact us by contact form. IF YOU DO NOT ACCEPT AND AGREE WITH OUR PRIVACY POLICY, THEN YOU MUST NOT ACCESS OR USE THE PLATFORM. IF YOU USE THE PLATFORM FOLLOWING A CHANGE TO THE TERMS OF THIS PRIVACY POLICY, YOU ARE PROVIDING YOUR ACCEPTANCE OF OUR PRIVACY POLICY AS REVISED. Capitalized terms used herein without definition shall have the meanings ascribed to them in our terms of service.

1. INFORMATION COLLECTION

You can visit our website without giving away your personal information. Pecunio uses Google Analytics and Cookies in order to improve our service, user experience and analyse how the website is used. Aside from the approximate location (IP address), the information collected by Google Analytics is mostly anonymous traffic data including browser information, device information, language. We do not collect additional information, such as your age, gender, interests, bank details or clickstream. The collected information is used to provide an overview of how people are accessing and using the Pecunio website. It is not used for any additional purpose, such as to profile those who access our website.

- We may collect information including but not limited to the following about you and your use of our website, platform and service (together, our „Platform“) in order to create a better, more personalized experience for you or for internal research purposes: Your name, email address, address, date of birth, telephone number, a password selected by you, and pictures and data that may be selected or entered by you through the Platform. Furthermore, we may collect your payment and financial information which will be stored by our third party payment processors.
- Whenever you voluntarily disclose personal information on publicly-viewable screens or pages, that information will be publicly available and can be collected and used by others. For example, if you post your email address, you may receive unsolicited messages. We cannot control who reads your posting or what other users may do with the information you voluntarily post, so we encourage you to exercise discretion and caution with respect to posting your personal information.
- We automatically track certain information about our members including but not limited to internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, click patterns, etc.), your mobile device's unique ID number, your mobile device's geographic location while the app is running, your computer's IP address, technical information about your computer or mobile device (such as type of device, web browser or operating system), your preferences and settings (time zone, language, privacy preferences, product preferences, etc.), the URL of the last web page you visited before coming to one of our sites, the buttons, controls and ads you clicked on (if any), how long you used the Platform and which services and features you used, the online or offline status of the Platform.

- Please be careful about posting sensitive details about yourself including any Wallet Keys. While you may voluntarily provide this information to us when you create your profile, there is no requirement to do so. Where you do upload and choose to tell us sensitive information about yourself, you are explicitly consenting to our processing your information and making this public to other users.
- We collect information including but not limited to postings you make on the public areas of our website, messages you send to us, and correspondence we receive from other members or third parties about your activities or postings on our website.

Upon your request, we will deactivate your account and remove your personal information from publicly available sections of the Platform. To make this request, contact us by contact form. Upon our receipt of your request, we will deactivate your account and remove your personal information as soon as reasonably possible from publicly available sections of the Platform in accordance with our deactivation policy and applicable law. Nonetheless, we will retain in our files information you may have requested us to remove if, in our sole discretion, retention of the information is necessary to resolve disputes, troubleshoot problems or to enforce the Terms of Service Agreement. Furthermore, your information may never be completely removed from our databases due to regulatory requirements (for example, we will not remove your information from our back up storage). If you wish for any information to be permanently removed please contact us.

2. COLLECTION AND USE OF INFORMATION

You can visit our website without giving away your personal information. Pecunio uses Google Analytics and Cookies in order to improve our service, user experience and analyse how the website is used. Aside from the approximate location (IP address), the information collected by Google Analytics is mostly anonymous traffic data including browser information, device information, language. We do not collect additional information, such as your age, gender, interests, bank details or clickstream. The collected information is used to provide an overview of how people are accessing and using the Pecunio website. It is not used for any additional purpose, such as to profile those who access our website.

When you make a transaction on our platform, we collect the personal data you give us, such as inter alia name, address, email address, date of birth, etc. This is done as part of the transactional process, we need this to comply with strict AML/KYC regulations.

While you can use our website without giving out your personal information, once you contact us via the Pecunio website, Pecunio collects information about you. The information you fill in (personal information such as your name, email address, organisation) will be processed and stored so that it is possible for us to contact and respond to your request, and/or allow you access to our services.

Your information will be visible to other users of the platform to facilitate communication between users. We will never sell your information without your permission; however you agree that we may use your information in the following ways:

- We use the information we collect about you to create a better, more personalized experience for you based on your individual usage habits, improve our marketing and promotional efforts, analyze site usage and disclose aggregated statistics, improve our content and service offerings, aid in our monetization efforts, and customize our Platform's content, layout and services. This may include migrating your information to other platforms owned by us. We also use the information we collect about you to resolve disputes, troubleshoot problems, and enforce our Terms of Service Agreement.
- We may use your correspondence with us, information posted by you for publication on our Platform for promotional, sales or any use that we consider appropriate, whether submitted via email, postings on our Platform.
- We may share your information with third party partners or third parties hired by us to perform functions and provide services to us subject to confidentiality obligations consistent with this Privacy Policy and on the condition that the third parties use your information only on our behalf and pursuant to our instructions.
- We may disclose any information in response to a legal request such as a subpoena, court order, or government demand, to investigate or report illegal activity, or to enforce our rights or defend claims. We may also transfer your information to another company in connection with a partnership or a corporate restructuring, such as a sale or merger.

3. CHILDREN'S PRIVACY

Pecunio does not allow persons under 18 to register for any service, and we do not knowingly collect any personally identifiable information from persons under the age of 18. If you are aware of someone under the age of 18 using our Platform please contact us immediately by contact form.

4. STORAGE

Your information will be sent, stored, and processed in the UAE and Europe. By using the Platform, you agree that your personal information may be transferred to the UAE or elsewhere and you agree to the information collection, use, and sharing practices described in this Privacy Policy.

5. SECURITY

Pecunio cares to ensure the security of personal data. When Pecunio collects information about you, we also make sure that your information is protected from unauthorized access, loss, manipulation, falsification, destruction or unauthorized disclosure. This is done through appropriate technical measures.

We have established both physical and electronic procedures to safeguard and secure the information we collect. For this reason we use SSL certificates to secure our website. However, the internet is an open system, and we can make no guarantees as to the security or privacy of your information submitted to the Platform. For this reason, we recommend that you use anti-virus software, routine credit checks, firewalls and other precautions to protect yourself from security and privacy threats.

Data Incidents

"Data Incident" means a breach of Pecunio's security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Client Personal Data on systems managed by or otherwise controlled by Pecunio. "Data Incidents" will not include unsuccessful attempts or activities that do not compromise the security of Client Data, including unsuccessful log-in attempts, pings, port scans, denial of service attacks, and other network attacks on firewalls or networked systems.

Incident Notification

If Pecunio becomes aware of a Data Incident, Pecunio will:

- (a) notify Client of the Data Incident promptly and without undue delay; and
- (b) promptly take reasonable steps to minimize harm and secure Client Data.

Details of Data Incident

Notifications made pursuant to this section will describe, to the extent possible, details of the Data Incident, including steps taken to mitigate the potential risks and steps Pecunio recommends Client takes to address the Data Incident.

Delivery of Notification

Notification(s) of any Data Incident(s) will be delivered to the Administrator Email Address or, at Pecunio's discretion, by direct communication (for example by phone call or an in-person meeting). Client is solely responsible for ensuring that the Administrator Email Address is current, valid and actively monitored.

No Assessment of Client Data by Pecunio

Pecunio will not assess the contents of Client Data in order to identify information subject to any specific legal requirements. Client is solely responsible for complying with incident notification laws applicable to Client and fulfilling any third party notification obligations related to any Data Incident(s).

No Acknowledgment of Fault by Pecunio

Pecunio's notification of or response to a Data Incident under this Section will not be construed as an acknowledgement by Pecunio of any fault or liability with respect to the Data Incident.

Access to Information

You have the right to request access to the information we have on you. You can do this by contacting us at office@pecun.io. We will make sure to provide you with a copy of the data we process about you. In order to comply with your request, we may ask you to verify your identity. We will fulfil your request by sending your copy electronically, unless the request expressly specifies a different method. For any subsequent access request, we may charge you with an administrative fee.

Information Correction & Deletion

If you believe that the information we have about you is incorrect, you are welcome to contact us so we can update it and keep your data accurate. Any data that is no longer needed for the purposes specified in Information Collection and Use will be deleted. If at any point you wish for Pecunio to delete information about you, you can simply contact us.

6. THIRD PARTY WEBSITES

The Platform may contain links to other websites that we believe may be of interest or use to you. We provide these links solely as a convenience to you. Links may be also posted by other users of the Platform. When accessing a third party website through our Platform, you acknowledge that you are aware that these third party websites are not screened for privacy or security issues by us. Please note that our Privacy Policy and information collection, use and sharing procedures do not apply to other websites. We take no responsibility for and incur no liability for other websites' collection, use or sharing of information. Please review the privacy policies provided by each website linked to the Platform to familiarize yourself with the procedures of such websites. Please be aware that this Privacy Policy, and any other policies in place, in addition to any amendments, do not create rights enforceable by third parties.

7. LAW ENFORCEMENT

You agree that we may disclose your information to authorities if compelled to by a court order. Additionally, you agree that we may disclose your information if we reasonably believe that you have violated the UAE laws, or international laws or the terms of our Terms of Service or Privacy Policy, or KYC/AML policy or if we believe that a third party is at risk of bodily harm. In the event that we receive a subpoena affecting your privacy, we may elect to notify you to give you an opportunity to file a motion to quash the subpoena, or we may attempt to quash it ourselves, but we are not obligated to do either. We may also proactively report you and release your information without receiving any request to third parties where we believe that it is proper to do so for legal reasons, where your actions violate any law of the UAE or any other country having jurisdiction over us, the Platform, or our Terms of Service. You release us from any damages that may arise from or relate to the release of your information to a request from law enforcement agencies or private litigants. We may release your information under the conditions listed in this paragraph whether it is to individuals or entities and to any state or national authorities, as required.

8. COMMERCIAL AND NON-COMMERCIAL COMMUNICATIONS

If you decide to provide us with your contact information, you agree that we may send you communications and emails ("Double opt-in"). However, you may unsubscribe from certain communications by notifying Pecunio that you no longer wish to receive such communications. Once notified, we will endeavour to remove you from our database immediately. If you wish to opt out of certain communications, please contact us by contact form.

9. THIRD PARTY ACCESS TO YOUR INFORMATION

Through our Privacy Policy you agree to disclose your information to us, we do use third party individuals and organizations to assist us, including contractors, web hosts, and others to help provide our services through the Platform. For example, we use Service Providers to assist in securing your personal information. Throughout the course of our provision of our services to you through our Platform, we may delegate our authority to collect, access, use, and disseminate your information. It is therefore necessary that you grant the third parties we may use in the course of our business the same rights that you afford us under this Privacy Policy. For this reason, you hereby agree that for every authorization which you grant to us in this Privacy Policy, you also grant to any third party that we may hire, contract, or otherwise retain the services for the purpose of providing service to you or for operating, maintaining, repairing, or otherwise improving or preserving our Platform or its underlying files or systems. As we do not control these third parties, you agree not to hold us liable for the actions of any of these third parties, even if we would normally be held vicariously liable for their actions, and that you must take legal action against them directly should they commit any tort or other actionable wrong against you.

10. COOKIES AND TRACKING

Cookies are little bits of code that help identify you when you use our Platform. We may use cookies and other tracking mechanisms through our Platform to identify you and remember your preferences. If you have any questions regarding the tracking mechanisms we use please contact us by contact form. We currently do not subscribe to any do-not-track listings.

11. AMENDMENTS

We may amend this Privacy Policy from time to time. When we amend this Privacy Policy, we will modify the date listed on this Agreement or we may contact you. You must agree to the amendments as a condition of your continued use of our Platform. If you do not agree, you must immediately cease using our Platform and notify us of your refusal to agree by contact us by contact form.

12. ACCESSING, EDITING, AND REMOVING YOUR INFORMATION

After creating an account you will be able to access and edit your information through the login dashboard. Please be aware that although you will be able to access and edit your information, you will not be able to opt out of our data collection practices. Additionally, if you wish to opt out of our data collection practices or would like us to remove any of your information, please contact us by contact form.

13. TO SUM UP

In accordance with applicable laws and regulations, we only collect a limited amount of information about you that is necessary for improving our service. We do not use profiling, we do not sell or in any other way spread your data to third parties, we do not use your data for purposes other than what we specified. We also make sure that your data is stored securely. We delete all information deemed no longer necessary. We constantly review our Privacy Policy in order to make it better and protect you more.

14. YOU CAN

contact us at any time to:

- Request access to information that Pecunio has about you
- Correct any information that Pecunio has about you
- Delete information that Pecunio has about you

If you have any additional questions about Pecunio's collection and storage of data, please contact us at: PECHUNIO BLOCKCHAIN TECHNOLOGIES FZE (duly incorporated and licensed in the UAE, License #4822, Business Center Al Shmookh Building, UAQ Free Trade Zone, Umm Al Quwain, UAE; office@pecun.io