

Privacy Policy

Last update: September 17, 2020

Our Commitment to You

Loyalfinance OU, a company incorporated under the laws of Estonia, company number 14485917, with a registered office at Harju maakond, Tallinn, Kesklinna linnaosa, Tina tn 9, 10126, Estonia, with [license](#) of financial services, providing services of exchanging a virtual currency against a fiat currency number FVR001161 and providing virtual currency wallet services license number FRK001048 (“Company”) is dedicated to providing users with the highest level of transparency and control over the use of their data. In order for us to provide you with our services we are required to collect and process certain personal information about you and your activity.

By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of this Information. We encourage you to review the following information carefully.

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Grounds for data collection

Processing of your “Personal Data” (meaning any information which may potentially allow your identification with reasonable means) is necessary for the performance of our contractual obligations towards you and providing you with our services and the operation of our website (hereinafter the “Services” and “Website”), to protect our legitimate interests and for compliance with legal and regulatory obligations to which we are subject.

When you use our Service, you consent to the collection, storage, use, disclosure and other uses of your Personal Data as described in this Privacy Policy.

How do we receive data about you?

We receive your Personal Data from various sources:

1. Registration data – When you voluntarily provide us your personal details in order to create an account or register to our Services (for example, your name and email address);
2. When you communicate with us – For example when you send us an email, we collect the Personal Data you provided us with.
3. Technical data – When operating our services, we use various technological tracking tools to collect data regarding your use of the Website. Along with our partners, we may use tracking technologies such as cookies, JavaScript, beacons and Local Storage, which are used to store content data and preferences. You can learn more about the tracking tools we use by reading the Tracking Technologies section below.
4. Third party data – We may receive your data from third party providers who help us with the provision and maintenance of our Services, such as social networks (for example your name and user name, when you register or log-in to our Service), traffic analytics vendors, fraud prevention agencies and others.

What type of data we collect?

Personal Data

In the course of using the Service, we may ask you to provide us with certain Personal Data to provide and improve the Service, to contact or identify you, to enable you to access certain parts of the Website, and as otherwise indicated in this Policy. We collect the following

Personal Data about you:

- Registration data – your name, address, your email address, your age range and payment details.
- When using our Services – our webserver will collect your IP-address and UID.

Non-Personal Data

We also collect data about the use of our Service and the characteristics and activities of users, in order to operate it and improve it. We may collect the following non-Personal Data:

- Technical data – this category includes data such as website visits, the browser you are using and its display settings, your operating system, device type, session start/stop time, time zone, network connection type (e.g., Wi-Fi, cellular), cookie data and your general location (city and country).
- Data from third parties – this category includes data we receive from our business partners. This may include pseudonymous advertiser identifiers that some Advertisers or other third party ad platforms choose to share with us. This data is also used to enhance data points about a particular unique browser or device.

If we combine Personal Data with non-Personal Data, the combined data will be treated as Personal Data. Further Personal Data will only be stored and processed if you voluntarily provide it to us, e.g. through a contact form.

Tracking Technologies

When you visit or access our Services we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies. Those allow us to automatically collect data about

you, your device and your online behavior, in order to enhance your navigation in our Services, improve our Website's performance, perform analytics and customize your experience on it. In addition, we may merge data we have with data collected through these tracking technologies with data we may obtain from other sources and, as a result, such data may become Personal Data.

We also use a tool called "Google Analytics" to collect data about your use of the Services. Google Analytics collects data such as how often Users access the Services, what pages they visit when they do so, etc. We use the data we get from Google Analytics only to improve our Services. Google Analytics collects the IP address assigned to you on the date you visit, rather than your name or other identifying data. We do not combine the data collected through the use of Google Analytics with personally identifiable data. Google's ability to use and share data collected by Google Analytics about your visits to our Services is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

Managing your cookie settings and opting out of 3rd party cookies

There are various ways in which you can manage and control your cookie settings. Please remember that, by deleting or blocking cookies, some of the features of the Services may not work properly or as effectively.

- Turning off cookies via your web browser

Most web browsers will provide you with some general data about cookies, enable you to see what cookies are stored on your device, allow you to delete them all or on an individual basis, and enable you to block or allow cookies for all websites or individually selected websites. You can also normally turn off third party cookies separately. Please note that the settings offered by a browser or device often only apply to that particular browser or device.

- Data about cookies is usually found in the "Help" section of the web browser. Below is list of some most commonly used web browsers:

- Microsoft Edge (Internet Explorer)
- Google Chrome
- Opera
- Opera Mobile
- Mozilla Firefox
- Safari (Desktop)
- Safari (Mobile)
- Android Browser

For other browsers, please consult the documentation that your browser manufacturer provides.

- Turning off third party cookies

You can turn off certain third party targeting/advertising cookies by visiting the following link: [Network Advertising Initiative](#).

- Other helpful resources

To learn more about advertisers' use of cookies the following links may be helpful:

- [European Interactive Digital Advertising Alliance \(EU\)](#)
- [Internet Advertising Bureau \(US\)](#)
- [Internet Advertising Bureau \(EU\)](#)

How do we use the data we collect?

- Provision of service – for the provision and improvement of our Services, including for support and to respond to your queries.
- Service announcements – we will use your Personal Data to communicate with you and to keep you informed of our latest updates to our Services and offer you service offers.
- Marketing and advertising purposes – We may use your Personal Data in the following ways: we may send you promotional material concerning our Services, or our partners' services, which we believe might interest you; we may also display certain adverts on our site, which we believe will be relevant for you. Furthermore, by subscribing to our newsletter you will receive tips and announcements straight to your email account. We make our best efforts to make sure you see only relevant ads and receive relevant communications from us, including but not limited to, by building an automated profile based on your Personal Data. You may however choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the "unsubscribe" link in the emails that you receive from us. Please note that even if you unsubscribe from our newsletter, we may continue to send you service-related updates and notifications, or reply to your queries and feedback you provide us. You may also object to the use of your Personal Data for advertising purposes by disabling your cookies, as described in the tracking technologies section above.
- Opt-out of receiving marketing materials – If you do not want us to use or share your Personal Data for marketing purposes, you may opt-out in accordance with this "Opt-out" section. Please note that even if you opt-out, we may still use and share your Personal Data with third parties for non-marketing purposes (for example to fulfill your requests, communicate with you and respond to your inquiries, etc.). In such cases, the companies with whom we share your Personal Data are authorized to use your Personal Data only as necessary to provide these non-marketing services.
- Analytics, surveys and research – from time to time, we may conduct surveys or test features, and analyze the data we have to develop, evaluate and improve these features, all in order to improve our Services and think of new and exciting features for our users.
- Protecting our interests – we may use your Personal Data when we believe it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect the rights and property of the Company, its users and/or partners.
- Enforcing of policies – we may use your Personal Data in order to enforce our policies, including but limited to our .
- Compliance with legal and regulatory requirements – we may use your Personal Data to investigate violations, and as required by law, regulation or other governmental authority, or

to comply with a subpoena or similar legal process.

With whom do we share your Personal Data?

- Internal concerned parties – we share your data with companies in our group, as well as our employees, in order to provide you with our services.
- Business partners – we share your data with business partners, such as storage and analytics providers, or credit verification companies, who help us provide you with our service. These third parties may have access to your Personal Data so that they may perform these tasks on our behalf, but they are obligated to comply with this Privacy Policy and may not use your Personal Data for any other purpose.
- Compliance with laws and law enforcement entities – we cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any data about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect our or a third party's property and rights, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable. We also may be required to disclose an individual's Personal Data in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.
- Merger and acquisitions – we may share your data if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your data in accordance with the terms of this Privacy Policy.
- Company may process personal data for the purpose of performance of due diligence measures set forth in the laws on prevention of money laundering and similar laws even if the law itself does not require performance of such measure, but market practice does (i.e., if financial institutions decline to transact with Company if such measures are not taken). The basis of processing of personal data is article 6(1)(f) of the General Data Protection Regulation.

Transfer of data outside the EEA

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

How we protect your data

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Data. Your data is stored on secure servers and isn't publicly available. We limit access of your data only to those employees or partners on a "need to know" basis, in order to enable the carrying out of the agreement between us.

While we seek to protect your data to ensure that it is kept confidential, we cannot absolutely guarantee its security. You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account. You will be solely responsible for keeping your password confidential and for all use of your password

and your account, including any unauthorized use. You should also be aware that there is always some risk involved in transmitting data over the internet. While we strive to protect your Personal Data, we cannot ensure or warrant the security and privacy of your Personal Data or other content you transmit using the service, and you do so at your own risk.

Retention

We will retain your Personal Data for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of data that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused data at the earliest reasonable time. Under applicable regulations, we will keep records containing client personal data, trading data, account opening documents, communications and anything else as required by applicable laws and regulations.

EU User Rights

You may request to:

- a. Receive confirmation as to whether or not Personal Data concerning you is being processed, and access your stored Personal Data, together with supplementary data.
- b. Receive a copy of Personal Data you directly volunteer to us in a structured, commonly used and machine-readable format.
- c. Request rectification of your Personal Data that is in our control.
- d. Request erasure of your Personal Data.
- e. Object to the processing of Personal Data by us.
- f. Request to restrict processing of your Personal Data by us.
- g. Lodge a complaint with a supervisory authority.

However, please note that these rights pertain to EU residents only, are not absolute, and may be subject to our own legitimate interests and regulatory requirements. Users outside the EU are welcome to contact us for any questions or requests at the details below.

How to contact us?

If you wish to exercise any of the aforementioned rights, or receive more information, please contact us using the details provided below:

Loyalfinance OU

Harju maakond, Tallinn, Kesklinna linnaosa,

Tina tn 9, 10126, Estonia.

Email: support@bitofheaven.io

Our Policy toward Children

We understand the importance of protecting children's privacy, especially in an online environment. The Site and Services are not designed for or directed at children under the age of 16 years old ("Minors"). We do not knowingly collect Personal Data from Minors. If a parent or guardian becomes aware that his or her child has provided us with Personal Data, he or she should contact us using the details provided above.

Updates to this Policy

This Privacy Policy is subject to changes from time to time, in our sole discretion. The most current version will always be posted on our website (as reflected in the “Last Update” heading). You are advised to check for updates regularly. By continuing to access or use our Services after any revisions become effective, you agree to be bound by the updated Privacy Policy. If you do not agree with any of the amended terms, you must avoid any further use of the Website.