

Effective Date: January 06, 2024

CryptoWits Sp. z o.o Privacy Policy (“Policy”) describes the way we treat personally identifiable information that we collect when you are on a site, web portal or web pages operated or owned by <https://crypto-quantum.com/> (“Website”) or affiliated with CryptoWits Sp. z o.o (“<https://crypto-quantum.com/> Website(s)”). By using our services or opening an account with us, you are deemed to have agreed to the terms of this Policy.

We adhere to certain practices regarding your personally identifiable information, that is, data which can be used to identify or made identifiable an individual.

To be fully compliant with personal data protection rules we adhere to the following principles in order to protect your privacy:

We respect the right of individuals to access their personal data.

We will provide you with choices and means to limit the use and disclosure of your personal data.

We will not rent or sell your personal data to third parties.

Any personal data that you provide to us will be secured with industry standard safety protocols and technology.

We are committed to follow certain principles of personal data received from the EU in reliance on GDPR effective as of May 25, 2018.

We will collect your personal data only for the purposes set forth herein.

We provide you with the means to contact us regarding inquiries or complaints of yours.

CryptoWits Sp. z o.o aims to ensure that this Policy is always publicly, transparently and easily applicable at CryptoWits Sp. z.o.o.’s websites.

IF YOU DO NOT AGREE TO THIS POLICY, PLEASE DO NOT ACCESS OR USE OUR WEBSITE.

1. Collecting Your Personal Information

If you apply for an account with us you will be required to provide us with personal data in order to perform our services.

We collect from you the following personal data that you share with us upon registration:

- first name
- last name
- e-mail address

For the purpose of further verification of your account (if applicable), you must present to CryptoWits Sp. z o.o an identity document or send a scan or photo thereof in the .jpg or .png format by means of the form on the Website. The scan/photo of the identity document must meet the following terms: data on the document must be clearly visible, all edges of the document must be visible, no data can be covered. The file cannot contain any signs of digital remake (e.g. painting over of an element using a graphic program). Placement of a watermark is admissible. In case of doubts, CryptoWits Sp. z o.o can ask you to

send the photo of their identity document made so that both the face and their identity document can be seen simultaneously.

2. Processing Your Personal Information

Personal data is processed pursuant to the provisions of the Regulation of the European Parliament and of the Council (UE) 2016/679 of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/CE (J. o.L. UE 2016, it. L119) and the Act of 10th May 2018 on the Protection of Personal Data

The basis for the processing of data are either your consent or provisions of law that authorize to process personal data, including in particular any relevant laws and regulations on counteracting money-laundering and terrorism financing.

The provision of data is voluntary, however indispensable for rendering our services. The processing of your personal data collected when you register is based firstly on your consent as you read and accept the Policy before you create an account and give any personal information. You can withdraw your consent at any time, going on your personal account.

In order for us to provide our services we will need to undertake as the collection, recording, organization, storage, adaptation / alteration, retrieval, consultation, use, disclosure / dissemination, along with its erasure or destruction of your personal data, either among our affiliates or other authorized third parties. Our Website does not collect any sensitive personal data about you (i.e. gender, racial origin, financial position).

CryptoWits Sp. z o.o is concerned with protecting your privacy and have rigid procedures & systems for data protection by design and default in place to protect the information against unlawful or unauthorized access, accidental loss or destruction, damage, unlawful or unauthorized use and disclosure. We will also take all reasonable precautions to ensure that our staff and employees who have access to personal data about you have received adequate training.

CryptoWits Sp. z o.o provides sufficient guarantees to implement appropriate technical and organizational measures in such manner that processing will meet the requirements of GDPR and ensure the protection of the rights of data subject. Indeed, the following specific measures are put in place:

In providing our service to you we may be required to transmit your personal data to third parties located outside the EU countries which could not have the same standards of protection for personal data. By registering your personal data with us, you agree to such transfer and use of your personal data. We will at all times ensure that third parties to whom your data is transferred have committed that they will comply with our data protection standards by putting in place a contract to ensure your information is adequately protected. Our collection, storage and use of your personal data will at all times continue to be governed by this Policy.

The Website or other CryptoWits Sp. z o.o Website(s) may contain hyperlinks to websites operated by parties other than CryptoWits Sp. z o.o Such hyperlinks are provided for your reference only. CryptoWits Sp. z o.o does not control these websites and is not accountable for their contents or how they collect and handle your data.

The processing of your personal data for the purposes described is based on your explicit consent or on the necessity to process your personal data for the purposes of legitimate interests, as provided by Article 9, 2., (a) and (f) of the GDPR. Once you have established an account with us, we may use your personal data for the following purposes:

- verifying that you are the account holder if you contact us;
- informing you of any changes affecting your use of your account with us;
- contacting you for marketing of additional products or services we offer;
- contacting you for crime and fraud investigations, detection and prevention;

When collecting data, only the personal data absolutely required for that purpose may be requested. This means that no data other than what is necessary can be requested, or stored.

Basically, we consider that your personal data should be retained only while necessary. In particular, personal data should be deleted once the legitimate purpose for which it was collected has been fulfilled. However, we may retain personal data even after an account has been closed or is no longer engaged in business with CryptoWits Sp. z o.o if retention is reasonably necessary to comply with our legal obligations or meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Policy or our contractual obligations.

We take commercially reasonable efforts to secure your personal data and protect it from unauthorized access, use or disclosure. If you provided us with electronic data, we will secure your personal data on our servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All electronic personal information is transmitted to other Websites through the use of Secure Socket Layer (SSL) encrypted protection. We will retain your personal information for a reasonable period or as long as required by law

We do not knowingly request to collect personal information from any person under the age of 18. If a user submitting personal information is suspected of being younger than 18 years of age, we will require to close his or her account and will not allow to continue buying or selling digital currencies. We will also take steps to delete the information as soon as possible.

3. Your Rights

As your data controllers, we want to uphold an honest and transparent Policy about your freedoms and rights as a user. This Policy outlines the purposes of the processing for which the personal data are intended as well as the legal basis for the processing.

You shall have the right to make a request to us in order to enforce your rights to:

- Access personal data;
- Rectify personal data, when inaccurate or incomplete;
- Cancel processing of personal data;
- Object “with legitimate reasons“ the process of his personal data; and/or;
- Revoke consent for the use, storage, treatment, process and/or, disclosure of personal data.

The enforcement and upholding of your privacy rights should be requested to us in writing and must include, at a minimum, the following information:

- your complete name, address and/or e-mail address in order for us to notify you the response to your privacy request;
- attached documents establishing your identity;
- a clear and concise description of the personal data with regard to which you seek to enforce any of your privacy rights. If you request rectification, please indicate amendments to be made and attach documentation to back up your request.

In order to enforce of your privacy rights, please contact us by email compliance@enivma.com. Upon receipt of your privacy request, and after due review of its merit, we may then edit, deactivate and/or delete your personal data from our Website or services. Please take into account that we may not be able to delete all of your data from some our databases and that, if so is the case, we will then mark such data as permanently inaccessible. In case of amendment of personal data, you are obliged to perform actions aiming at updating personal data on the account.

We can deny removal of personal data in a justified case (if you have completed transactions), and in particular if you:

- have violated terms of use of the Website, or;
- have violated the effective provisions of law, and the maintenance of personal data is indispensable for explanation of such circumstances and determination of the scope of your liability. In each case of denial of personal data removal, we shall inform you on the reasons of such denial along with the legal grounds thereof.

In case of doubts regarding the method of processing personal data, you can receive explanation from us and have the right to file an inquiry, a reservation or a complaint to the supervisory body.

The basis for processing data are in particular the effective regulations and provisions of law and the consent if it was given by you.

On the basis of the processed personal data decisions shall not be made automatically as well as data shall not be used for profiling.

We may share non-personally identifiable information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain CryptoWits Sp. z o.o products and those of our partners. Such results consist solely of non-personally identifiable information. Non-personally identifiable information may be stored indefinitely

You can access some of the information that we collect about you. For example, by logging into your account, you can access information regarding recent transactions; certain personal data we maintain about you; your communication preferences; and other settings.

With respect to your communications preferences, you can unsubscribe from any materials by following the instructions included in the communication letter you receive, or you can log into your account and update your email subscription options. If your email address has changed and you would like to continue to receive materials, you will need to access your account, update your email address information in your account, and sign up again.

You also have choices with respect to cookies, as described in Section 4 of the Policy. By modifying your browser preferences, you may be able to choose to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject all cookies some parts of our Websites may not work properly in your case.

4. Cookies

A cookie is a text file that is used for an origin website to send state information to a user's browser and for the browser to return the state information to the origin site. The state information can be used for authentication, identification of a user session, user's preferences, shopping cart contents, or anything else that can be accomplished through storing text data on the user's computer. We only use session cookies which are essential for the operation of the service you request. These cookies do not contain any personal information and are deleted when you close your browser. Our or our third party's data processors websites use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics also uses cookies. The information generated by these cookies about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our website. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Information on some of your actions is subject to log into the server layer. This data is only used to administer the Website and to ensure the most efficient hosting services, also for evidential purposes in connection with committed crimes or due to circumstances connected with seeking claims in civil proceedings.

Browsed resources are being identified by URLs. Moreover, the following data may be stored:

- date of request;
- time of reply;
- name of your station identification carried out by HTTP, HTTPS protocols,
- information on errors that occurred during the HTTP, HTTPS transactions,
- URL of the page previously visited (referrer link) when the transition to the Website took place by reference,
- information about your browser,
- IP address information.

Some of the above data is not associated with particular users using the Website. We do not associate this data with your personal data and do not use it for your identification as it is only used for the purpose of server administration.

5. Disclaimer

Please note that even though CryptoWits Sp. z o.o uses industry-leading measures to protect data, we cannot ensure or warrant the security of any information you transmit to CryptoWits Sp. z o.o or guarantee that your information on CryptoWits Sp. z o.o may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical or managerial safeguards. No method of transmission over the Internet or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. CryptoWits Sp. z o.o uses an internal protocol for security measures to ensure that outside personnel cannot access our databases. We also apply access restrictions and educate staff members on how to properly handle personal data.

In case a personal data breach occurs that could result in a high risk to the rights and freedoms of natural persons, we will notify you immediately in a notification describing the nature of the data breach, the likely consequences of the personal data breach and the measures taken to address it.