

Privacy Policy

1. General provisions

1.1. Together with our Terms of use (also referred as: “Terms”) this Privacy Policy governs Equito’s collection, processing and use of your Personal Information/data by using Equito’s:

- Website at <https://equito.co> (also referred as: “Website”),
- Any other Services accessible through the Website

This policy sets out the basis on which any Personal data we collect from You, or that You provide to Equito, will be processed and used by Equito.

1.2. Personal information/data refers to any information that can be associated with a specific person (also referred as: “You” or “User”) and can be used to identify that person, directly or indirectly, in particular by reference to an identifier such as a name, address, e-mail address, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person and other required information User provides (in this policy collectively referred as: “Personal data” or “personal information”).

1.3. Equito is committed to protecting and respecting your privacy and your right to fair and just processing of your Personal data. This Privacy policy is intended to help you better understand how we collect, use, process and store your Personal data and describes your choices regarding certain types of processing. We are aware of the importance of how Personal data are handled and we assure you that we observe all applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 (hereinafter: GDPR).

1.4. Unless otherwise indicated, terms used in this Regulation shall have the same meaning as under GDPR.

1.5. Equito is the data controller responsible for your Personal data. This privacy policy is issued on behalf of the Equito so when we mention Equito, “we”, “us” or “our” in this privacy policy, we are referring to the company Equito and its related group of undertakings, responsible for processing your data.

1.6. We have a data protection and privacy officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests, please use the contact details set out below.

1.7. Equito’s contact details:

Full name of legal entity: Cryptix d.o.o.

Equito, registration number:

Email address: info@equito.co

Postal address: Ameriška ulica 8, 1000 Ljubljana, Slovenia

Complaints

You have the right to make a complaint at any time to the Office of the Information Commissioner. We would, however, appreciate the chance to deal with your concerns before you approach the data protection office, so please contact us in the first instance.

Equito will:

- Always keep your data safe and private.
- Never sell your data.
- Allow you to manage and review your marketing communication preferences at any time.

Equito does not collect or process your genetic, physiological, mental, racial or ethnic origin, cultural or social identity Personal data, political opinions, religious or philosophical beliefs, trade union memberships, data concerning health or data concerning a natural person's sex life or sexual orientation.

2. Cookie policy

2.1. When Users access the Website or use Services, Equito may place small data files called cookies on User's computers or other devices. This helps us to provide you with a good experience when you use the Apps, Platform or browse our Website and also allows us to improve the App and our Website. Equito uses these technologies to recognize you as User of the Website, Platform and/or other Services in order to customize the Website and advertising content, measure communication and marketing effectiveness and collect information about User's devices to mitigate risk, help prevent fraud and promote trust and safety.

2.2. We may use cookies, pixel tags, web beacons, and other tracking technologies to collect information about you when you interact with our Services, including information about your browsing behaviour on the Webpage.

2.3. Most web browsers are set to accept cookies by default. You are free to decline most of our cookies if your browser or browser add-on permits but choosing to remove or disable our cookies may interfere with your use and functionality of the Services. Additionally, we may use certain persistent cookies that are not affected by your browser settings but will use such cookies solely for identity verification and fraud prevention purposes. For more information about cookies and how to block, delete or disable them, please refer to your browser instructions, or contact us at info@equito.co.

3. Information we collect about you

3.1. Equito may collect, use, store and transfer different kinds of Personal data about you which we have grouped together as follows:

Submitted Personal information:

This is Personal information you may give us about you by filling in forms on Website or corresponding with us by mail, phone, email or otherwise. This includes Personal information You provide by:

- filling in forms on the Website or subscribing to our Newsletter (such as Equito news and updates that provide information regarding the latest information, promotions, and industry

news), download a document from Website, register for a webinar or enter an Equito's contest, survey or other marketing activity. The latter shall be further described in terms and conditions of the relevant activity, and/or

- (actively) corresponding with us (for example, by e-mail, via the chat functions on the Website and/or through our customer service or otherwise actively correspond with Equito) and/or participating in discussion boards or other social media functions on the Website,
- Submitted Personal information in particular includes:
 1. Identity data: first name, maiden name, last name, title, date of birth username, password and other registration information and/or similar identifiers,
 2. Contact data: address, e-mail address, phone number,

3. Marketing

4.1. Equito is striving to provide clear information of Personal data usage for our marketing purposes and simple access to individual's communication preferences management or opt-out from receiving any marketing communications from us whenever you want.

4.2. We provide you clear choices on your Personal data uses for marketing and advertising purposes. You can always access your personal communication preferences management page via our e-mail (info@equito.co).

5. Promotional offers from us

5.1. We may use your Personal data (such as your Submitted Information and Automated Personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

5.2. You will receive marketing communications from us if you have signed up to and/or utilize the Equito Services and, in each case, you have not opted out of receiving marketing notifications.

6. Third-party marketing

6.1. We will not share your Personal data with any company outside the Equito that is not our contracted data processor, who is obliged to process Personal data on behalf of Equito at least in such a manner that processing will meet the requirements under GDPR.

7. Opting out

7.1. You can stop receiving marketing messages at any time by adjusting your preferences in communication preferences management page, accessible in e-mail or by sending your choice to info@equito.co

8. Disclosure of your personal data

8.1. Data processing partners

1. We will disclose the Personal data we collect from you to certain third parties (processors) who use Personal data in delivering their Services to us. Such partners shall use Personal data securely and confidentially and under strict contractual controls in accordance with data protection laws and enforced by Equito.

2. We send Personal data to the following sets of data processors in order to perform the Equito Services and/or to provide you customized marketing communication with your consent:
 - MANGOPAY, a public limited liability company incorporated in Luxembourg, with a capital of 12.700.000 euros and registered offices at 2 Avenue Amélie, L-1125 Luxembourg, listed under number B173459 on the Luxembourg Trade and Company Register, approved as an electronic money institution by the Financial Sector Regulator (CSSF): For providing payment services;
 - CM-Equity AG, a financial services company and securities trading company within the meaning of §1 para. 3d sentence 2 German Banking Act (Kreditwesengesetz – “KWG”) and article 4 para. 1 number 2 of the Directive (EU) Nr. 575/2013 and headquartered at Kaufingerstrasse 20, 80331 Munich, Germany: For providing investment services;
 - Cloud storage providers: This is in order to safely and securely store your data with Equito;
 - Advertisers and analytics providers, e.g. Google Analytics: For advertising networks, we utilize anonymized Personal data in order to serve relevant adverts to target segments. However, Equito will never disclose identifiable information to advertisers.
 - Marketing automation and CRM provider: This data processor enables us to collect and manage your Personal data at one place (at least in such a manner that processing will meet the requirements under GDPR) and to ensure you the rights to access, manage, export or delete your Personal data according to GDPR.
 - Companies within the Cryptix group of undertakings (Cryptix Holding AG and its subsidiaries): In order to provide a unified service across all of our Services, we may disclose your Personal information to any member of the Cryptix group of undertakings, which means any of our subsidiaries or related entities. Companies in the Cryptix will be acting as joint controllers or processors in order to provide the Equito Services.

9. Your legal rights

9.1. You have rights under data protection laws in relation to your Personal data. Please see below to find out more about these rights:

9.2. Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal data we hold about you. If you require this, then please reach out to our support team (info@equito.co).

9.3. Request correction of the Personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you require this, then please reach out to our support team via the in-App chat function.

9.4. Request erasure of your personal data. This enables you to ask us to delete or remove Personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. As a person subject to due diligence in

accordance with Anti-money laundering and counter terrorist financing regulation, Equito is under certain obligations to retain certain data for a minimum of 10 years (see above). Please note that these retention requirements supersede any right to erasure requests under applicable data protection laws.

9.5. Object to processing of your Personal data. This is in situations where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights. As a person subject to due diligence in accordance with Anti-money laundering and counter terrorist financing regulation, Equito is under certain obligations to process and retain certain data for compliance purposes. Please note that these requirements supersede any right to objection requests under applicable data protection laws. If you object to the processing of certain data, then we may not be able to provide the Equito Services and it is likely we will have to terminate your account.

9.6. Request restriction of processing of your Personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful, but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Please note that any requests in relation to the restriction of the processing of your data means that we may not be able to perform the contract we have or are trying to enter into with you (including the Equito Services). In this case, we may have to cancel your use of the Equito Services but we will notify you if this is the case at the time.

9.7. Request the transfer of your personal data to you or to a third party. We will provide to you, your Personal data in a structured, commonly used, machine-readable format, which you can then transfer to an applicable third party. If you require this then please reach out to our support team via info@equito.co.

9.8. Withdraw consent at any time where we are relying on consent to process your Personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the Equito Services to you. Regardless of Users withdrawal of consent, Equito is obligated to process and store relevant Personal data for certain period in order to comply with legislation on prevention of money laundering, money laundering, terrorist financing, fraud, or any other financial crime.

10. Miscellaneous

10.1. NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your Personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

10.2. WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal data (or to exercise any of your other rights). This is a security measure to ensure that Personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10.3. TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10.4. IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (including the Equito Services). In this case, we may have to cancel your use of the Equito Services but we will notify you if this is the case at the time.

11. **Changes to privacy policy**

11.1. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail and/or when you next start the App or log onto the Website. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App, Platform and/or the Services.

12. **Contact**

12.1. All questions relating to data and your privacy are welcomed and should be addressed to our support team or to our appointed data protection officer. If you have any questions, comments or requests regarding this privacy policy then please:

- Contact us via our support team: info@equito.co