

PRIVACY POLICY GENERAL

This Privacy Policy, together with our Terms of Use, governs LongCoin's collection, processing and use of your Personal Data.

As used in this Privacy Policy, "we", "us" or "our" refers to "LongCoin" or "longcoin.tech", a Fintech startup, which is a data controller under this Privacy Policy and may use your Personal Data.

"DP Law" means data protection law applicable to LongCoin, including the EU General Data Protection Regulation 2016/679, its successors or implementing texts. Personal Data" has the meaning set forth in DP Law. This notice covers our use of your personal data arising from use of the LongCoin's website (www.longcoin.tech) as well as registering / subscribing / buying / using our products and services. If you have any questions or need any further clarity please get in touch. Contact details are set out below in the Contact Us section.

In this Privacy Policy capitalised terms have the meaning set out in the Definitions section below.

LongCoin are committed to protecting and respecting your privacy. The purpose of this Privacy Policy is to describe:

- The types of Personal Data we collect and how it may be used;
- Our use of cookies and similar technology;
- How and why we may disclose your Personal Data to third parties;
- The transfer of your Personal Data within and outside of the European Economic Area ("EEA");
- Your statutory rights concerning your Personal Data;
- The security measures we use to protect and prevent the loss, misuse, or alteration of Personal Data; and
- LongCoin's retention of your Personal Data.

COLLECTION AND USE OF PERSONAL INFORMATION

A. PERSONAL INFORMATION WE COLLECT

We collect the Personal Data you provide directly to us or which we generate when you use LongCoin services or our website. This may include:

- Contact information, such as name, home address, and email address;

- Account information, such as username, password, account settings and preferences;
- Financial information, such as crypto wallets addresses and it's transactions
- Identity verification information, such as images of your government issued ID, passport, national ID card, or driving licence. Note: US residents are prohibited to use our services
- Residence verification information, such as utility bill details or similar information;
- Information regarding the way in which you use our services, such as when you used our services and the specific services used; and
- Information relating to communications with us, whether through the LongCoin website or via e-mail, over the phone or via any other medium.

We also automatically collect certain computer, device and browsing information when you access the LongCoin website or use LongCoin Services. This information is aggregated to provide statistical data about our users' browsing actions and patterns, and does not personally identify individuals. This information may include:

- Computer or mobile device information, including IP address, operating system, network system, browser type and settings;
- Website usage information.

Finally, we may collect Personal Data from third party partners and public sources, which include:

- Reputational information;
- Financial information;
- Business activities of corporate customers.

We need to collect certain types of information for compliance with legal requirements relating to our anti-fraud/anti-money laundering/counter financing of terrorism/know your customer obligations. If this information is not provided we may not be able to provide a service for you. Your personal data may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claims. We will not delete personal data if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved. We do not perform behavioral tracking of a customer's activities on our LongCoin website or across

different websites, nor do we allow third-party data collection through our LongCoin Service save as expressly set out in this Privacy Policy.

B. USE OF COOKIES AND SIMILAR TECHNOLOGY

The LongCoin website is using cookies. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Cookies are typically stored on your computer's hard drive. Information collected from cookies is used by us to evaluate the effectiveness of our Site, analyze trends, and administer the Platform. The information collected from cookies allows us to determine such things as which parts of our website are most visited and difficulties our visitors may experience in accessing our website. With this knowledge, we can improve the quality of your experience on the Platform by recognizing and delivering more of the most desired features and information, as well as by resolving access difficulties. We also use cookies and/or a technology known as web bugs or clear gifs, which are typically stored in emails to help us confirm your receipt of, and response to, our emails and to provide you with a more personalized experience when using our Site.

If you want to avoid using cookies altogether, you can disable cookies in your browser. However, disabling cookies might make it impossible for you to use certain features or our website or Services.

C. HOW WE USE YOUR PERSONAL INFORMATION

We collect and use your information for a variety of reasons. We need some information to enter into and perform our contract – for example your contact details. Some information processing is required by law due to our anti-fraud screening obligations or in the public interest such as making sure we verify our customers' identities.

Some information is processed because you've given your consent to that, which can be withdrawn in your account preferences and settings. Other information we collect and use because we have legitimate business interests to so, having taken into account your rights, interests and freedoms.

We may use your Personal Information to:

- Process your LongCoin transactions
- Verify your identity in accordance with applicable know-your-customer, money laundering and other legislation or regulations
- Analyse LongCoin website usage, and improve our website and website offerings. Related processing operations are necessary for purposes of our legitimate interests (that is, improving and promoting our services);
- Help us respond to your customer service requests and support needs. Related processing operations are necessary for the performance of a contract with you, and for purposes of our legitimate interests (that is, improving our services and offering you the best experience);
- Contact you about LongCoin Services. The email address you provide may be used to communicate information and updates related to your use of the LongCoin Services.
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D. MARKETING

We may also occasionally communicate company news, updates, promotions and related information relating to similar products and services provided by LongCoin. We may also administer a contest, promotion, survey or other site features as will be more explained on the website. We shall only do this where you have given us your consent or otherwise where we are permitted to do so under DP Law in pursuit of our legitimate interests (that is, promoting our services).

We may share personal data with third parties to help us with our marketing and promotional projects, or sending marketing communications.

If you want to opt out of receiving promotional and marketing emails, text messages, post and other forms of communications from us [or our promotional partners] in relation to which you might receive in accordance with this section, you can best opt out by contact our support.

If you do opt out of receiving promotional and marketing messages, we can still contact you regarding our business relationship with you, such as account status and activity updates, survey requests in respect of products and services we have provided to you after you reserve from us, reservation confirmations or respond to your inquiries or complaints, and similar communications.

DISCLOSING AND TRANSFERRING PERSONAL DATA

We may disclose your Personal Data to third parties and legal and regulatory authorities, and transfer your Personal Data outside the EEA, as described below.

A. DISCLOSURES TO THIRD PARTIES

There are certain circumstances where we may transfer your personal data to employees, contractors and to other parties.

- We may share information about you with other members of our group of companies so we can provide the best service across our group. They are bound to keep your information in accordance with this Privacy Policy;
- We may also share your information with certain contractors or service providers. They may process your personal data for us, for example, if we use a marketing agency. Other recipients/service providers include advertising agencies, IT specialists, database providers, backup and disaster recovery specialists, email providers or outsourced call centres. Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function;
- We may also share your information with certain other third parties. We will do this either when we receive your consent or because we need them to see your information to provide products or services to you. These include credit reference agencies, anti-fraud databases, screening agencies and other partners we do business with.

Your personal data may be transferred to other third party organisations in certain scenarios:

- If we're discussing selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
- If we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you;

- If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;
- If we are defending a legal claim your information may be transferred as required in connection with defending such claim.

Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

Your information will not be sold, exchanged, or shared with any third parties without your consent, except to provide LongCoin Services or as required by law.

LongCoin's third party service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. We ensure that such third parties will be bound by terms complying with DP Law.

B. DISCLOSURES TO LEGAL AUTHORITIES

We may share your Personal Data with law enforcement, data protection authorities, government officials, and other authorities when:

- Compelled by court order, or other legal procedure.
- Disclosure is necessary to report suspected illegal activity.
- Disclosure is necessary to investigate violations of this Privacy Policy or our Terms of Use.

YOUR STATUTORY RIGHTS

You have certain rights concerning your Personal Data under DP Law as mentioned below, and can exercise them by contacting us at support@longcoin.tech

Access: you are entitled to ask us if we are processing your information and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it to check that we are lawfully processing it. We process a large quantity of information, and can thus request, in accordance with DP Law, that before the information is delivered, you specify the information or processing activities to which your request relates.

Correction: you are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected.

Erasure: you are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims.

Restriction: you are entitled to ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

Transfer: you may request the transfer of certain of your personal data to another party.

Objection: where we are processing your personal data based on a legitimate interests (or those of a third party) you may challenge this. However we may be entitled to continue processing your information based on the our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal data for direct marketing purposes.

SECURITY OF PERSONAL DATA

We use a variety of security measures to ensure the confidentiality of your Personal Data, and to protect your Personal Data from loss, theft, unauthorised access, misuse, alteration or destruction. These security measures include, but are not limited to:

- Password protected directories and databases;
- Secure Sockets Layered (SSL) technology to ensure that your information is fully encrypted and sent across the Internet securely;
- PCI Scanning to actively protect our servers from hackers and other vulnerabilities.

All financially sensitive and/or credit information is transmitted via SSL technology and encrypted in our database. Only authorised LongCoin personnel are permitted access to your Personal Data, and these personnel are required to treat the information as highly confidential. The security measures will be reviewed regularly in light of new and relevant legal and technical developments.

We do not ask for financial or payment information, such as your credit card number, passcode, account number or pin number, in an e-mail, text or any other communication that we send to you. Please always check that any website on which you are asked for financial or payment information in relation to our reservations or services is operated by LongCoin. If you do receive a suspicious request, do not provide your information and report it by contacting one of our member service representatives as set in this Privacy Policy.

You are responsible for keeping your personal information safe and secure. Do not share those with anyone. If there is an unauthorised use or any other breach of security involving your information, you must notify us below as soon as possible.

RETENTION OF PERSONAL DATA

We retain Personal Data for as long as necessary to fulfil purposes described in this Privacy Policy, subject to our own legal and regulatory obligations. The criteria we may use to determine the retention period for certain categories of data includes:

- How long you have been using LongCoin Services;
- whether there are contractual or legal obligations that exist that require us to retain the data for a certain period of time;
- whether there is any ongoing legal or financial claim that relates to your relationship with us;
- whether any applicable law, statute, or regulation allows for a specific retention period; and
- what the expectation for retention was at the time the data was provided to us.

UPDATES TO THIS PRIVACY POLICY

This Privacy Policy was last revised effective August 1 2018. We may change this Privacy Policy from time to time, so it is advisable to review it frequently. Changes to this Privacy Policy will be announced on our website or through similar means for a reasonable length of time prior to and following the change taking effect.

DEFINITIONS

Personal Data. Information that identifies an individual, such as name, address, e-mail address, crypto wallets addresses. Personal Data does not include anonymised and/or aggregated data that does not identify a specific user;

Service(s). The technological platform, which allows users to be a member of our investment portfolio