



PRIVACY POLICY

Updated: December 01, 2022

AGAMABIT SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (LLC)
Hoża 86/210, 00-682 Warsaw, Poland

1. INTRODUCTION

- 1.1. AGAMABIT SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (LLC) (“AGAMABIT”, “we”, “us”, “our”) provides its clients (“Client”, “you”, “your”) with fast, reliable and protected cryptocurrency exchange services (“Services”). By applying for an account with AGAMABIT on the website <http://agamabit.com> (“Website”), you consent to the collection, processing and receipt of your personal data, information about an identified or identifiable individual (“Personal data”), according to this Privacy Policy. Our contact details are provided for any feedback or privacy enquiries if needed.
- 1.2. In this Privacy Policy we define measures, obligations, roles, rights, purposes, data storage and recommendations regarding data protection.
- 1.3. AGAMABIT develops and maintains high standards of inner security measures and technologies to provide you with secure processing and storage of the data we collect from you; and keep your data safe against unauthorized or unlawful processing and against accidental loss, destruction or damage, we implement all necessary protection measures and are following fully the high data protection standards contained in the Regulation.

2. LEGAL

- 2.1. The provisions of this Privacy Policy are subject to the General Data Protection Regulation (Regulation (EU) 2016/679) and the Law on the Implementation of the General Data Protection Regulation 2018 (hereafter – Regulation).
- 2.2. The lawful basis for the data processing is the legitimate interest of the data subject, the consent to data collection and processing, contract execution, or execution of legal obligations under applicable legislation.

3. DATA CATEGORIES AND PURPOSES

- 3.1. AGAMABIT collects and processes following categories of data:
 - Client information: account registration info (Name, DOB, Citizenship), contact info (phone number, e-mail, identity verification documents (passport or ID card, utility bill), financial information (income source, tax residency) etc.;
 - Cryptocurrency exchange / payments, payouts: sums, IBAN, BTC address, PIN, name of subject, e-mail and cookie specifications, DocuSign, onfido, etc.;
 - Chat channels: information and help regarding buy or sell procedure via available and supported channels;
 - Notice system: e-mail notice/invoice (info with data required by the law), newsletter (e-mail – with consent), information on clients data rights and obligations (IP address);
 - Cookies (functional): IP address, frequency of access, device fingerprint;
- 3.2. These are the purposes for collection and processing of the abovementioned data:



- Fulfillment of AGAMABIT contractual obligations and legal obligations under Regulation.
- Provision of Services, including execution of requested transactions and related maintenance of the services you registered for and manage the account you hold;
- Provision of the information about your activities within the account;
- Information about any changes and updates to the Services you are provided with;
- Assessment and mitigation of risks related to anti-money laundering and terrorism financing regulations as well as transaction related risks;
- comply with applicable legislation;
- Maintenance of actions in relation to legal claims;
- Provision of additional or supportive services, as well as performance of client surveys and statistical analysis;
- Performance of marketing activities;
- Improvement of the performance and functionality of our Services.

The above list may be extended depending on the development of the offered Services.

4. DATA DISCLOSURE

- 4.1. Any Personal data shall be disclosed only as described and for purposes stated in this Privacy Policy, and/or as permitted or required by law. Personal data may be disclosed to our subsidiaries, affiliated companies and subcontractors, our trusted third party providers and also to members of management bodies, employees, representatives, authorised persons of AGAMABIT for any of the following purposes:
 - hosting and operating our Website;
 - providing you with our Services (including providing a personalized display of our Website);
 - storing and processing such information on our behalf;
 - for marketing purposes according to this Privacy Policy;
 - performing research, technical diagnostics or analytics;
- 4.2. Personal data can also be disclosed, if we believe that disclosure of such information is helpful or reasonably necessary for: compliance with any applicable law, regulation, legal process or governmental request; for enforcement of our policies or other legal rights; for investigation, detection, prevention, or to take action against illegal activities, suspected fraud or security issues; for establishment or exercise of our rights.
- 4.3. Your telephone calls, emails, web chat or other communications can be monitored or recorded for regulatory, security, quality assurance or training purposes. When visiting our offices, video surveillance, access control systems and/or other monitoring systems may be in operation for security reasons and for health and safety and office management purposes.

5. PROTECTION OF PERSONAL DATA

- 5.1. We use all measures defined within integrated data protection framework. In order to protect your data we are keeping the Personal data up to date, storing and destroying it securely, we are collecting and retaining only the necessary data, we ensure that appropriate technical and organizational measures are in place to protect your data. We require any third party to comply with similar security requirements, in accordance with this Privacy Policy. Our personnel is



educated about all connected matters to data protection. All devices that we use for all purposes are protected with standard security measures.

6. TRANSFER OF DATA

- 6.1. Please note that some data recipients may be located outside the EEA (European Economic Area). In such cases we will transfer your data only to the countries that are approved by the European Commission as a country with adequate data protection level, or we will enter into an agreement, that will ensure you an adequate level of data protection.

7. INCIDENTS

- 7.1. The Client will be notified without undue delay and in compliance with respective Regulation about any breach of our security leading to the accidental or unlawful destruction, loss, alteration or unauthorized disclosure of, or access to (excluding unsuccessful attempts or activities) Personal data of Clients on systems managed or otherwise controlled by us.
- 7.2. The data incidents notification from AGAMABIT may not be and will not be construed as an acknowledgment of any fault or liability with respect to data incident by us.

8. CLIENT'S DATA PROTECTION RIGHTS

- 8.1. You can exercise your rights in relation to your Personal data in accordance to the relevant data protection legislation. In total, you have right to: access, correction, delete, limitation of data processing, transfer, objection on processing, objection on profiling, consent withdraw and complaint to the data protection authority. If you have any questions in relation to our use of your Personal data, contact us.
- 8.2. Your exercise of these rights is subject to certain exemptions to safeguard the public interest, e.g., the prevention or detection of crime, and our interests, e.g., the maintenance of legal privilege. If you exercise any of these rights, we will check your entitlement and respond in most cases within a month.

9. CLIENT'S SECURITY COMMITMENTS

- 9.1. You agree, that you have to keep your security details safe and ensure that there is no unauthorized use of those according to our Terms and Conditions, and that it is your responsibility to make appropriate use of our Services to ensure a level of security appropriate to the risk in respect of your Personal data and securing your authorization credentials, system and devices which you use to access our Services.

10. STORAGE OF PERSONAL INFORMATION

- 10.1. Your Personal data shall be stored no longer than it is reasonably required for the purposes for which Personal data is processed. Our legal obligation is to maintain records of Personal data for ten years after the relationship with the client is terminated. We reserve the right to erase specific information before the expiry of the set period if this is not prohibited by the applicable legal acts.

11. COOKIES



- 11.1. We use at our Website cookies and other technologies in our related Services. Cookies do not contain any information that personally identifies you, but Personal data that we store about you may be linked, by us, to the information stored in and obtained from cookies.
- 11.2. The setting of cookies can be adjusted in the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of the Website and

many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the Website. We recommend that you do not disable cookies.

12. CHANGES

- 12.1. Please note that this Privacy Policy may be amended from time to time. Any changes to the Privacy Policy will be effective as of the moment of its appearance at the Website. The date the Privacy Policy was last modified will be stated on the policy. If we will be required by law to give you advance notice of any changes in our Privacy Policy, then we will do so. Your continued use of our Services shall mean your consent to the changes in the Privacy Policy and your wish to be bound by the updated terms of the Privacy Policy.

13. CONTACT DETAILS

- 13.1. All comments, queries and requests relating to our use of your information are welcomed. You may submit your questions, requests and complaints to our data privacy department by email to support@agamabit.com or by post to AGAMABIT SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (LLC), Hoża 86/210, 00-682 Warsaw, Poland.