



## **Privacy and Data Retention Policy**

This Privacy and Data Retention Policy (the Policy) explains the way in which Finance Bank LTD. (hereinafter referred to as "Proxoin") collect, use, share, and protect Personal Information of Users ("you") obtained through Proxoin.com ("Websites"), any related applications (including but not limited to the mobile one) and exchange tools integrated into third party services ("Services"). The terms "we," "us," and "our" refer to the entities indicated below.

"Personal Information" is an information that identifies or can be used to identify, contact, or locate the person to whom such information pertains.

We are fully committed to respecting privacy and to protecting any information that our clients provide. Your privacy and security are both our highest priorities and we make every effort to ensure that all the information provided by you is protected.

We follow and comply with best practices and regulation in the sphere of privacy including but not limited to General Data Protection Regulation (GDPR).

### **1. Who We Are**

The Personal Information is collected, controlled and processed by the following entities:

Finance Bank LTD. SRFRB, Tifariti, 2390835, SADR, contact e-mail: [compliance@proxoin.com](mailto:compliance@proxoin.com)

### **2. Personal Information Which We May Collect**

While providing our Services, we may collect Personal Information, namely:

An information necessary for registration. In order to access the full functionality of the Service, you need to register. When you go through the registration process, you shall provide an e-mail address and create a password. You may also choose to log in via supported third-party service provider (for example, Twitter, Facebook and Google+). You can also choose to add a Google Authenticator account to be used for 2FA verification for improved security;



Transaction Information. For all personal user accounts, we collect transaction information including transaction history.

An information, which we may collect through automated means. Through your use of our Services, including exchange tools, we also monitor and collect tracking information related to usage such as access date & time, device identification, operating system, browser type and IP address. This information may be directly obtained by Us or through third party services.

Sometimes you decide or we require (for example in case of KYC procedure) to share with us some other Personal Information, we may collect it as well.

We do not collect any information that may identify You without your permission. However, We use Google Analytics on Our Technology Platform. If You want to know more about Google Analytics and its “do not track” policy, please visit [google analytics](#)

### **3. Children**

We do not intend to solicit or collect Personal Information from anyone under the age of 16 or under the legal age of your country, if it is higher. If you are under 16 or are not of a legal age of your country, do not enter any personal information on our Website and Services platform.

### **4. Our Use of Your Information**

We and our representatives store and use Personal Information only for providing and improving the Website and the Services. In particular, we use user's Personal Information for the following purposes:

To maintain our Website and the Services. We use Personal Information to ensure that our services function properly;

To improve our Website and Services. Personal Information helps our systems ensure that our interface is accessible for Users across all platforms;



To comply with our legal obligations. In many jurisdictions we are obliged to collect certain information about our users to be authorized to act (Know Your Client and Anti-Money Laundering regulations). We obliged to obtain Personal Information in order to be able to aid during criminal investigations;

To protect your assets We may use information to identify you and the assets belonging to you in order to secure access to your accounts and to prevent the fraud. Information about your transaction allows us to monitor suspicious activity and protect you from fraud and scam activity;

To send periodic e-mails We may use the information we collect from you when you register or use certain other site features. This might be for security reasons, to ask your opinion about the website, or it may be to keep you updated on any changes to the services provided on the Website and our Services. We may also send periodic emails with news and Services updates, or use this information to follow up with you following live chat or email;

To resolve disputes and enforce our agreements to the extent necessary and sufficient for protecting your interests or interests of other users.

## **5. Data Retention**

We will retain your information only for as long as is necessary for the purposes set out in this policy. We will retain your information just to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

The User may request to remove the personal data. Should that be a case, user requests could be fulfilled by the erasure of personal data to the extent permissible by the applicable law and regulations. In certain cases we are obliged to store your information to be legally compliant.

## **6. Cookie Policy**



Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from the Website and stored on your computer's hard drive.

We use cookies to recognise your browser or device, learn more about your interests, and provide you with essential features and services and for additional purposes, including:

Recognising you when you sign-in to use our services;

Keeping track of your specified wallet addresses for improving user experience;

Keeping track of transaction initiating process;

Preventing fraudulent activity;

Improving security;

Reporting. This allows us to measure and analyse the performance of our services.

You can manage browser cookies through your browser settings. The "Help" feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, how to disable cookies, and when cookies will expire. If you disable all cookies on your browser, neither we nor third parties will transfer cookies to your browser. If you do this, however, you may have to manually adjust some preferences every time you visit a Website and some features and services may not work.

## **7. Security Measures**

Proxoin aim to protect your information as much as we aim to protect our own information and network. We will not permit any third parties to contact you directly on an unsolicited basis in relation to their own products or services. We do not sell, trade, or rent your



personal identification information to others. You should never disclose your account password to unauthorized parties.

We use certain security measures to help keep your personal information safe, but we cannot guarantee that these measures will stop any users try to get around the privacy or security settings on the Website and Services platform through unforeseen and/or illegal activity. That is why we make no warranty, express, implied or otherwise, that we will prevent such access.

## **8. How We Can Disclose Your Information**

We may enter into a contract with third parties that need to know personal information to help us provide our Services. In order to provide us contractual services these third party service providers are required to follow this Policy and are limited to only using the information as instructed.

You agree that we may share and transfer your information to the third party who is a contracting party with us. Sharing information is possible only in the ways that are described in this Policy.

Notwithstanding anything to the contrary in this Policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; to protect the safety of any person; to address fraud, security or technical issues; or to protect our or our users' rights or property.

## **9. Your Rights to Your Information**

In accordance with effective regulations You have a significant number of rights related to your Personal Information, such as e.g.:

The right to access and amend the personal information we hold about you. You have a right to request a copy of the personal information we hold about you. Also you have the right to correct or update your Personal Information at any time.

The right to delete the Personal Information. You may request to remove the personal data If you do not want to use our Services or want your data to be erased, you can request us to



remove your account permanently. Should that be a case, your requests could be fulfilled by the erasure of personal data to the extent permissible by the applicable law and regulations. In certain cases we are obliged to store your information to be legally compliant.

The right to restrict processing. You have the right to ask us to restrict the processing of your Personal Information. When processing is restricted, we can still store your information, but will not use it further.

The right to object to the processing of your data. You have a right to object to our use of your Personal Information for our own purpose at any time. In other words you can withdraw your consent to processing your Personal Information by us. In case you want to exercise this right, you may contact us. This right also includes the right to object to processing your Personal Information for marketing and advertising purposes. You can do it by clicking on the special button (an unsubscribe button) or by contact us and opting out from receiving all e-mails.

The right to data portability. You have the right to receive Personal Information you provide to us, in a "commonly used machine-readable format". This allows you to obtain and reuse your information for your own purposes across different services.

The right to lodge a complaint with a Supervisory Authority.

In case you want to exercise your rights, please contact us.

There are exceptions to these rights, however. For example, access to Personal Information may be denied in some circumstances if making the information available would reveal Personal Information about another person or if we are legally prevented from disclosing such information. In addition, where some of the data is necessary to maintain our Website and Services or where that is a legal requirement, we may retain such data for the period it is needed or required even if you withdraw your consent or cancel your account. Such information will not be considered as subject to erasure.



## **10. Law and Harm**

Notwithstanding anything to the contrary in this Policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; to protect the safety of any person; to address fraud, security or technical issues; or to protect our or our users' rights or property. However, nothing in this Policy is intended to limit any legal defences or objections that you may have to a government's request for disclosure of your information.

## **11. Changes to Policy**

This Policy may be amended at our full discretion without prior notice. We encourage you to review it periodically in order to be aware of the changes we may have made. Reading it carefully and checking for any modifications is your responsibility. By using the Services, you accept and agree to the Policy and the Terms of Use.

## **12. Contact Us**

If you have any questions about this Policy, please contact us via [compliance@proxoin.com](mailto:compliance@proxoin.com)