Privacy Policy

SMOOTH TECH SP. Z O.O. and its affiliates (referred to as the "Company," "we," "us," or "our") are dedicated to safeguarding your privacy. This Privacy Policy, along with our Terms and Conditions, outlines how we collect, process, and use your Personal Information. Our practices comply with the General Data Protection Regulation ((EU) 2016/679) ("GDPR"), which governs the collection, use, and disclosure of this information.

By using our website, chainswapper.com (the "Site"), you agree to be legally bound by this Privacy Policy. Please read it carefully to understand our practices regarding your Personal Information and how we handle it. If you disagree with any part of this Privacy Policy, please refrain from using the Site.

Definition of Personal Information: We define "Personal Information" as any information that identifies you personally.

Purpose of This Privacy Policy

This Privacy Policy aims to inform you about:

- 1. The types of Personal Information we may collect and how it is used.
- 2. Our practices regarding IP Addresses and cookies.
- 3. Any potential disclosure of Personal Information to third parties.
- 4. Your rights to correct, update, or delete your Personal Information.
- 5. The security measures in place to protect your Personal Information.

Gathering and Use of Personal Information

We may collect your Personal Information when you use the Site, open an account, or perform transactions. The types of Personal Information we may collect include:

- 1. Name
- 2. Photographic identification
- 3. Address
- 4. Phone number
- 5. Email address
- 6. Banking details, including account numbers
- 7. Personal information such as passport and income details
- 8. Date of birth
- 9. Trade information
- 10. Other personal details, including interaction history with us

We use your Personal Information for:

- 1. Opening and managing your account on the Site.
- 2. Processing transactions on the Site.
- 3. Responding to your inquiries.
- 4. Analyzing Site usage.
- 5. Meeting regulatory requirements.
- 6. Providing information about products and promotions, if you have agreed to receive such communications.
- 7. Conducting market research, such as surveying Member needs and opinions.
- 8. Verifying and authenticating Site users' identities.
- 9. Preventing or detecting fraud and other criminal activities.
- 10. Creating anonymous statistics from Personal Information.
- 11. Tailoring marketing communications to ensure relevance.

Individual Users:

- Full name, date of birth
- Contact details, mailing address, email address, phone number
- Proof of identity (e.g., passport, driver's license)
- Residence verification (e.g., utility bill)
- Additional information for Anti-Money Laundering (AML) analysis

Corporate Users:

- Full legal entity name
- Legal documents (e.g., certificate of incorporation, articles of association)
- Verification information for related persons
- Bank details
- Additional information for AML analysis

We will process your Personal Information solely for the purposes for which it was provided.

IP Addresses

We may collect information about your computer, including your IP address, operating system, and browser type, for system administration.

Cookies

We use cookies, which are unique identifiers assigned to your computer and stored on your hard drive. Cookies help us evaluate Site effectiveness, analyze trends, and administer the Site. They also enable us to identify popular Site areas and resolve access issues. Additionally, we use cookies and web bugs or clear gifs to confirm email receipt and response, and to enhance your personalized experience on our Site.

We use third-party service providers to better understand Site usage. These providers place cookies on your computer and analyze data such as navigation patterns and transaction details. The information collected may be combined with data we collect about you. Our service providers are contractually obligated to use this information only to assist us.

By using our Site, you consent to our use of cookies as described.

Disclosure of Personal Information

We may use your Personal Information for the purposes stated at the time of collection or as otherwise outlined in this Privacy Policy. We may share your Personal Information with affiliates, agents, representatives, trusted service providers, and contractors for these purposes. In the event of a merger, acquisition, or corporate reorganization, your Personal Information may be shared with relevant entities.

We may also disclose Personal Information to law enforcement or regulatory agencies as required by law. Any third party receiving your Personal Information is required to protect it and use it only for the services they provide. We ensure that such third parties are aware of and comply with our Privacy Policy and applicable data protection laws.

Correction, Updating, and Deletion of Personal Information

Under GDPR, you have the following rights regarding your Personal Information:

- 1. **Correction**: Request correction if your Personal Information is inaccurate or incomplete.
- Erasure: Request deletion of your Personal Information, subject to legal restrictions.
- 3. **Restriction**: Request suspension of processing your Personal Information.
- 4. **Objection**: Object to the processing of your Personal Information, particularly for marketing purposes.
- 5. **Transfer**: Request transfer of your Personal Information to a new service provider or another party.
- 6. **Other Rights**: Any additional rights granted by GDPR.

These rights may be limited in certain circumstances based on applicable legislation. To exercise these rights, contact us at support@chainswapper.com

Security

We have implemented security measures to protect your Personal Information from loss, misuse, alteration, or destruction. Access to Personal Information is restricted to authorized personnel only, who are required to keep it confidential. Our security measures are reviewed periodically in accordance with legal and technical developments.

Retention of Personal Information

We will retain your Personal Information only as long as necessary to fulfill the purposes described in this Privacy Policy and to meet legal and regulatory requirements. We will keep Accounts and Personal Information for at least five years after they are closed.

Links

Our Site may contain links to third-party sites and resources. This Privacy Policy applies solely to our Site. We do not control or assume responsibility for third-party sites and their content. We encourage you to review the privacy policies of any third-party sites you visit.

Changes

We may revise, update, or supplement our Site policies, content, and features at any time without prior notice. Any changes to this Privacy Policy will be communicated via notice on our Site, and the updated policy will be posted. It is your responsibility to review the Privacy Policy regularly for updates.

Contact Us

For any questions, comments, or concerns regarding this Privacy Policy or our practices, please contact us at:

• **Email**: <u>support@chainswapper.com</u>

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