

PRIVACY POLICY

1. General Provisions

1.1 The present Privacy Policy determines the order of collection, processing, usage, protection, storage and distribution of information about natural persons, who use the Website functions (hereinafter – "Users").

1.2 The present Privacy Policy is valid in respect of all information, including personal data, which company Agora Management Limited and/or its affiliated persons, including those entering into the same group with company Agora Management Limited, can receive from Users during the use of functions and services of the Site, and also during execution by Agora Management Limited and its affiliated persons of any agreements and contracts, concluded with Users in connection with use of the Site and its services by Users.

1.3 The purpose of this Privacy Policy is to ensure appropriate protection of information about Users, including from unauthorized access and disclosure.

1.4 In order to fully comply with the legislation and international law norms, the Website Operator considers its main tasks to be to observe the principles of lawfulness, justice and confidentiality when processing the Users' personal information, including personal data, as well as to ensure their processing security. The Website Operator makes it its primary goal and task to take the maximum possible measures and actions to protect the Users' personal data, including from the unauthorized access and disclosure.

1.5 This Privacy Policy specifies how information about the Users is collected, used and disclosed by the Website Operator, as well as how the User's personal data is processed, in the cases of

- visiting and using the Site's services (regardless of where the User visits or uses them from);
- registering an Account and opening a digital wallet; and
- applying for or using any related services offered by the Site Operator in connection with the use of the Site, including the exchange of virtual financial assets and digital wallet services.

1.6 Use of the Website functions means unconditional consent of the User to the present Privacy Policy and conditions of processing of his data and other information specified therein. If the User does not agree with the provisions of this Policy, the User has no right to use the Site.

1.7 If User does not agree with these terms, User must refrain from using the functions of the Site. If there are any changes to this Privacy Policy that User does not agree with, User must stop using the Site.

1.8 Beginning to use any features, services and functions of the Site, including viewing the Site pages, regardless of the fact of registration on the Site, means the User's consent to this Privacy Policy, including all special conditions and rules mentioned in it, without any reservations.

2. Purposes of collecting and storing information about Users

2.1 The Operator collects and stores information about the User in order to perform its obligations concerning token trading and to provide a range of technical and information services for access to the Site's services.

2.2 The Website Operator uses the collected data for providing services to Users and improving the quality and range of services according to Users' needs, including personalization of functions and content, providing individual recommendations and specially selected content. The Website Operator uses personal

information of Users to track how Users interact with the services of the Website.

2.3 Information about data analysis and statistical information is presented in an impersonal form.

2.4 The operator of the Site assumes that the User provides reliable and sufficient information in his digital wallet and keeps this information up to date.

2.5 The operator of the Site always processes the personal information of Users for certain purposes and only that Personal information which is relevant for achievement of such purposes.

2.6 The operator of the Site collects and stores personal information about the User for the following purposes:

2.6.1 Identifying the User on the Site;

2.6.2 Providing the User with access to the Site's services;

2.6.3 Communication with the User, including the provision of technical support to the User,

2.6.4 sending notices, requests and other information to the User's e-mail address related to the use of the Site, as well as processing requests and applications from the User;

2.6.5 improving the quality of the provision of the Site's services, the ease of its use, and the development of new services;

2.6.6 Carrying out statistical and other researches on the basis of impersonal data.

2.7 The operator of the Site takes all necessary measures to protect the User's personal data from unauthorized access, change, disclosure or destruction. The operator provides access to personal data of the User only to those employees, contractors of Algora Management Limited, which need this information to ensure the functioning of the Site and providing services to the User.

3. Principles and content of personal data processing

3.1 Processing of personal data shall be based on the following principles:

- Processing of personal data shall be performed on a lawful and fair basis;
- Processing of personal data shall be limited to specific, predetermined and legitimate purposes;
- Processing of personal data incompatible with the purposes of personal data collection shall not be permitted;
- personal data bases containing personal data, the processing of which is carried out for purposes incompatible with each other, shall not be merged;
- Only personal data that meets the purposes of its processing shall be processed;
- The content and scope of processed personal data corresponds to the stated processing purposes, processed personal data is not excessive in relation to the stated processing purposes;
- Processing of personal data shall ensure accuracy of personal data, its sufficiency and, if necessary, relevance in relation to the stated purposes of its processing;
- storage of personal data shall be in a form, which allows to identify the subject of personal data no longer than required by the purposes of personal data processing, unless the period of storage of personal data is stipulated by law, contract
- Processed personal data is subject to destruction or depersonalization upon achievement of processing purposes or in case of loss of necessity in achievement of these purposes, if other is not stipulated by the law.

3.2 The Site Operator assumes that the User provides true and sufficient information in their account and keeps that information up to date.

3.3 The operator of the Site doesn't check reliability of the received (collected) information on the Users.

3.4 The present Privacy Policy is applicable only to the specified Website. The Operator does not control and is not responsible for the websites of the third parties, to which the User can go by the links available by using the Site. Other personal information may be collected or requested from the User on the third parties' websites, as well as other actions may be performed.

4. What data the Operator collects

4.1 The Site Operator collects information that the User provides directly to the Operator. The types of information the Operator can collect include the User's name, e-mail address, phone number, certain information about virtual financial assets and in addition any additional information the User chooses to provide. Only the personal information necessary for the performance and execution of the tasks and services of the Site Operator or provided by the User on a voluntary basis is collected.

4.2 The Operator can collect the following categories of personal information about the Users during the User's use of the Site services:

4.2.1 Personal information provided by the User when registering (creating a digital wallet), such as name (nickname), phone number, email address;

4.2.2 Electronic data (HTTP headers, IP-address, cookies, web beacons/pixel tags, browser ID data, hardware and software information);

4.2.3 date and time of access to the Site's services;

4.2.4 Information about Users' activity while using the Site's services;

4.2.5 Other information about Users required for processing in accordance with the terms and conditions governing the use of the Site's services.

4.3 In all cases, the Website Operator collects the following information when accessing our Website:

4.3.1 technical / log data includes IP address, User's login information (username and password), information about the User's internet service provider, device type, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, information about the User's use of the Services, including the browser access time and dates, pages viewed and the page the User visited before accessing our Services and other technology on devices the User has used

4.3.2 device data includes information about the computer or mobile device that User uses to access the Services, including hardware model, operating system and version, unique device identifiers, and mobile network information

4.3.3 usage data includes information about how the User uses the Platform.

4.3.4 The Site Operator also collects, uses and transmits aggregated data, such as statistical or demographic data, for any purpose. Aggregated data will be derived from the User's personal data, but is not considered personal data by law, as this data does not directly or indirectly reveal the User's identity.

4.4 The Operator also uses cookies and web beacons (including pixel tags) to collect Personal Information and to link such Personal Information to the User's device and web browser.

4.5 The Site may contain links to third-party sites, plug-ins and applications. Clicking on these links or enabling these connections may allow third parties to collect or transmit data about Users. The Site Operator has no control over these third-party websites and is not responsible for their privacy notices, statements, or policies.

5. Terms of processing information about the User

5.1 The Operator will use the User's personal data only for the purpose for which they were collected unless the Operator reasonably considers it necessary to use them for another reason, and this reason is compatible with the original purpose, or the Operator is obliged to process the data in accordance with the current legislation.

5.2 The data about the User is collected on the Site during his registration and authorization, as well as later on when the User, on his own initiative, enters additional information about himself with the help of the Site services.

5.3 User data is stored only on electronic media and processed through automated systems, except when non-automated data processing is required in connection with the performance of the requirements of the legislation of the User's country.

5.4 User Data will not be released to third parties unless expressly permitted by applicable laws of the country and this Privacy Policy. If specified by the User and/or with the User's consent, it is possible to transfer the User's data to third parties, with the obligatory condition that such parties take obligations to ensure the confidentiality of the information received.

5.5 User data is deleted if:

- the User's own deletion of data from his digital wallet;
- User's own deletion of his digital wallet;
- Deletion by the Operator of the information posted by the User, as well as the User's

account in cases specified in the User Agreement.

5.6 In case of independent deletion of the User's account by the User the Operator keeps the User's data

on its electronic media for the period established by the current legislation of your country.

6. Measures Used to Protect Users' Information

6.1 Although no online or electronic system guarantees security, the Website Operator takes reasonable measures to protect information about Users from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. In all services of the Site the reliable means of protection, providing safety of the Users' data, are realized. While maintaining services the Operator receives information, which allows detecting and automatically eliminating various security problems.

6.2 The Site Operator uses standard encryption for communication between the servers and the User's browser. We have taken appropriate technical and organizational security measures to prevent partial or complete loss of data, accidental or intentional manipulation, use or unauthorized access, modification, disclosure or destruction by third parties.

6.3 The Operator has restricted access to personal data to only those employees, agents, contractors and other third parties who need it. They will process the Users' personal data only according to the instructions of the Website Operator and they will be subject to the duty of confidentiality.

6.4 The Operator does everything possible to protect the Users from the unauthorized attempts of access, change, disclosure or destruction of the stored data.

The operator of the Site takes necessary and sufficient organizational and technical measures for protection of the User's information from illegal or casual access, destruction, change, blocking, copying, distribution, and also from other illegal actions with it of the third parties.

6.5 User login(email address) and password are used to authorize access to the Site. User is responsible

for the security of this information. The user has no right to transfer the login and the password to the third parties, and also is obliged to take measures on maintenance of their confidentiality.

6.6 The operator of the Site uses the industry standard of SSL-encryption to protect the transmission of data. However, it is not a guarantee that such information cannot be obtained, disclosed or destroyed by hacking the server software or other similar security tools.

6.7 If the Website Operator becomes aware of a security breach, the Operator undertakes to notify the User electronically so that the User can take the necessary protection measures.

7. About storage and transfer of User data

7.1 The Website Operator undertakes to store personal data only for the necessary period of time to fulfill the purposes for which it was collected and then for the purposes of satisfying any legal, accounting, tax and reporting requirements.

7.2 Because the servers of Algora Management Limited are located in different regions around the world, a particular user's information may not be processed in the country in which the user resides. The level of protection of information and legal regulations in this sphere may differ from country to country. Regardless of where exactly the User data is processed, the Website Operator uses the same security measures described in this Privacy Policy.

7.3 For Russian users: The Operator records, systematizes, accumulates, stores, clarifies (updates, changes), extracts personal data of citizens of the Russian Federation using databases located in the Russian Federation.

7.4 For users from EEA or Switzerland: The Operator has taken appropriate measures to ensure that such transfer is carried out in accordance with current EU data protection rules. In particular, the Site Operator relies on the Standard Contractual Conditions approved by the European Commission in order to ensure an adequate level of protection of Users' personal information.

7.5 The Website Operator also adheres to a number of legislative norms in the area of data transfer, including the framework agreement between the USA and the EU in relation to EU-US Privacy Shield Framework, as well as the similar agreement between the USA and Switzerland Swiss-US Privacy Shield Framework.

7.6 The Website Operator will retain Users' personal information for as long as necessary to achieve the purpose for which it was collected or to comply with legal and regulatory requirements.

Appendix 1

Subject's consent to the processing of his personal data

I, _____ (full name, address of the subject of personal data, number of the main document certifying his identity, information on the date of issue of the said document and the body that issued it), hereby give my consent to the company _____, located at: _____, for processing of my personal data, which include:

- FULL NAME
- country of residence
- place of residence
- contact phone number passport data
bank card payment details
- E-mail (e-mail address)

The purpose of processing personal data: to make a deal in the form of a smart contract and fulfillment of obligations to trade tokens, as well as providing a set of technical and information services to Users to access the services of the Site, and Partner Agreement on the use of referral links for access to the Site.

This consent is given for any actions in relation to my personal data that are necessary or desirable to achieve the above purposes, including (without limitation) the collection, systematization, accumulation, storage, clarification (updating, modification), use, distribution, depersonalization, blocking, cross-border transfer of personal data, as well as to perform any other actions with my personal data as provided by applicable law.

I hereby consent to information and advertising messages about products and services developed by _____ being sent to me by telephone, facsimile, mobile radio telephone communications, as well as by e-mail.

_____ guarantees that the processing of my personal data is carried out in accordance with applicable laws.

I am informed and consent that _____ will process my personal data by both non-automated and automated means of processing.

This Consent is valid until achieving the purposes of processing my personal data as prescribed by applicable law, or for a period of 1 year from the date of its receipt. After the expiry of the specified period, the consent shall be deemed extended for each subsequent year, provided that there is no evidence that it has been withdrawn.

Consent may be withdrawn by the subject by sending:

– written request of the subject to the postal address or sending a scan of a free-form letter signed by the subject of personal data and containing explicit withdrawal of consent to the processing of personal data to the e-mail address: _____.

I confirm that by giving such Consent, I am acting of my own free will and in my own interest.

_____ (FULL NAME)

signature