

# SÖGUR MONETARY TECHNOLOGIES LIMITED

## PRIVACY POLICY

Last revised: September 2020

### 1. Introduction

Thank you for accessing Sogur.com (the "**Site**"). This Site is operated by Sögur Monetary Technologies Limited ("**we**", "**us**", "**our**", or the "**Company**"), which is a company limited by guarantee organized under the laws of England and Wales.

This Privacy Policy ("**Privacy Policy**") sets out the basis on which any Personal Information we collect from you ("**you**", "**your**", or "**customer**"), or that you provide to us, will be processed by us, either through the use of the Site or use of any of the services, functions, or features offered from time to time on the Site ("**Services**").

By "**Personal Information**", we mean any information which, either alone or in combination with other data, enables you to be directly or indirectly identified, for example your name, email address, username, contact details or any unique identifier such as an IP address, device ID or other online identifier.

Please read the following carefully to understand what data we collect, how that data is used and the ways it can be shared by us.

### 2. What information do we collect?

We collect the following information:

- A. **Information you give us.** This is Personal Information about you that you give us by:
- i. registering for a Sögur account;
  - ii. volunteering your email address through designated features on our Site; or
  - iii. corresponding with us by phone, e-mail or otherwise.

The Personal Information most often collected and maintained in a customer file includes customer identification and transaction history.

#### **This information includes your email address and password.**

In addition, you may be asked to provide us with additional information, whether for account verification, for authentication or identification purposes, or for other financial or regulatory purposes, including to prevent fraud or money laundering.

#### **This information may include:**

- i. **Contact information:** this includes your full name, your residential address, your mobile phone number, your business phone number (optional) and other contact information.
- ii. **Additional information:** this includes your citizenship, nationality, gender, date of birth, resident status, marital status, tax residence country and tax ID.
- iii. **Occupation and Financial information:** this includes your occupation and job title, status of employments, the name of your employer, your employment period, your main and additional business activities, other businesses you own, your gross income, your previous roles, your expected activity, your total assets under management, the source of your wealth, whether you are beneficial owner or investment manager, your account purpose, your expected yearly volume of activity, and whether you are a Politically Exposed Person ("**PEP**") or associated with a PEP, as well as other financial information.
- iv. **Proof of identity:** this includes a copy of your government-issued IDs, such as your passport, a proof of your residential address and a "selfie" image. This information will only be used for

account verification, authentication or identification purposes, or for other financial or regulatory purposes, including the prevention of fraud or money laundering.

Please note that certain features of our Site or Service would not be accessible if you elect not to provide us this information, as this information is necessary for the performance of our contractual obligations, for our legitimate interest or in order to meet regulatory requirements.

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with us.

- B. **Information we collect about you.** Each time you use the Services, we automatically collect the following information, which may be considered to be Personal Information when combined with other information about you:
  - i. technical information, including the Internet protocol (IP) address used to connect your computer or other device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
  - ii. information about your visit, including the dates and times you use the Site length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), methods used to browse away from the page, and any phone number used to call the contact phone number provided on our Site.
- C. **Third party sources.** We may receive from third parties certain information related to you, for the purpose of carrying out our Service, for authentication and fraud prevention purposes, as well as to meet certain regulatory requirements (such as Know Your Customer and AntiMoney Laundering regulations).

### **3. Purposes for which we collect your Personal Information.**

If you wish to transact on and use the Site or use the Services, we will collect information about you for the purposes set out below:

- A. Establish and maintain a responsible commercial relationship with you, including to identify and authenticate your access to certain features of the Site and Services;
- B. Understand your needs and your eligibility for products and services, including our Site and Services;
- C. Inform you about trading and financing features, including providing you with information about developments and new products, changes and enhancements to the Site and new features of the Services;
- D. Develop, enhance, and market products and services and provide products and services to you;
- E. Process billing and collection of any fees;
- F. Conduct surveys and get feedback from you;
- G. Deliver products and services to you;
- H. Provide you with news and other matters of general interest to you as a our customer;
- I. Detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the Site or Services, including by identifying risks associated with your activity on our Site or Services;
- J. Investigate violations of our policies and enforce them, including our Terms of Use;
- K. Investigate and resolve disputes in connection with your use of the Services;
- L. Meet legal and regulatory requirements (such as Know Your Customer and AntiMoney Laundering regulatory requirements), or requests by other governmental authorities, courts and law enforcement agencies, or comply with a subpoena or similar legal process or respond to a government request.
- M. Analyze trends, administer the Site, track customers movements, and gather broad demographic information for aggregate use. For systems administration and detecting usage patterns and troubleshooting purposes, our web servers also automatically log standard

access information including browser type, access times/open mail, URL requested, and referral URL.

Please note that we reserves the right to block access for any customer accessing the Site via a proxy service intending to conceal original identity. This includes access via the Tor anonymity network.

#### **4. Legal bases on which we process your Personal Information**

We will process your Personal Information on the following grounds:

- A. Where it is necessary for us to perform contract with you or in your interests; and/or
- B. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Legitimate interest means the interest of our organization in conducting and managing our business to enable us to better serve you and provide you with a secure experience on the Site. We ensure that we balance any potential impact on you and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to do so by law).
- C. Where we have your consent to do so.

#### **5. Minors**

The Site and Services are not designed for or directed to persons under the age of 18 (“Legally of Age”). If you are not Legally of Age, you should not use the Services nor provide any Personal Information to us.

We reserve the right to access and verify any Personal Information collected from you. In the event that we become aware that a user who is not Legally of Age has shared any information, we may discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us at through the contact details below.

#### **6. Marketing**

We may use your Personal Information, such as your name, home address, email address, telephone number etc., ourselves or by using our third-party subcontractors for the purpose of providing you with promotional materials, concerning the Services.

We may also share and disclose Personal Information with our marketing affiliates for the purpose of providing you different marketing offers, which we, or our Marketing Affiliates, believe are relevant for you. Our marketing affiliates may use this Personal Information for different marketing techniques, such as direct email, post, SMS and telephone marketing purposes.

You may at any time decline receiving further marketing offers from us or from our business partners and marketing affiliates by contacting us through the contact details available below, or by following any opt-out or "unsubscribe" link available on our commercial communications. Please note that even if you unsubscribe from our marketing mailing list, we may continue to send you service-related updates and notifications.

#### **7. Third Party Tracking Technologies**

When you visit or access our Services (for example when you visit our Site), we use (and authorize third parties to use) web beacons, cookies, pixels, scripts, tags and other technologies ("**Tracking Technologies**").

The Tracking Technologies allow us to automatically collect information about you and your online behavior, as well as your device (for example your computer or mobile device), for different purposes, such as in order to enhance your navigation on our Services, improve our Services' performance and customize your experience with our Services. We also use this information to collect statistics about the usage of our Services, perform analytics, deliver content which is tailored to your interests and administer services to our Users, advertisers, publishers, customers and partners. To learn more, please visit our **Cookie Policy**.

## **8. Security and Confidentiality**

We are committed to protecting your privacy. Internally, only people with a business need to know Personal Information, or whose duties reasonably require access to it, are granted access to customers' Personal Information. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality.

The Site's systems and data are periodically reviewed to ensure that you are getting a quality service and that leading security features are in place. We have put in place procedures to deal with any actual or suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **9. Data Sharing**

We share your Personal Information as set out below:

- A. With any member of our group, which means our contractors, affiliates, employees, representatives, subsidiaries, our ultimate holding company and its subsidiaries.
- B. With our service providers, to the extent necessary to supply the Services to you.
- C. With selected third parties, including analytics and search engine providers that assist us in the improvement and optimization of the Services.
- D. With potential purchasers or investors in the Company, or in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, reorganization, bankruptcy, consolidation or asset sale of an asset or transfer in the operation thereof) in relation to the Company (in such event, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy).
- E. If we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation, or in order to enforce or apply our Terms of Service and other agreements; or to protect the rights, property, or safety of the Company, our clients, or others.
- F. With financial bodies, regulators and law enforcement agencies, as well as with courts, tribunals and administrative bodies, as required by law or regulation, or to comply with a subpoena or similar legal process or respond to a government request.
- G. With fraud detection and identity authentication vendors, in order to detect and prevent fraudulent and illegal activity;
- H. We reserves the right to share current and historical bids, asks, and market prices; opening and closing range prices; high-low prices; trade prices; estimated and actual trade volumes; settlement prices; and other aggregate data and information related to the Digital Tokens traded on the Site.

## **10. International Transfers**

Please note that our businesses, as well as our trusted partners and service providers, are located around the world. Any information that we collect (including your Personal Information) is stored and processed in various jurisdictions around the world for the purposes detailed in this Privacy Policy. Please note that some data recipients may be located outside the European Economic Area (the "EEA"). In such cases we will transfer your Personal Information only to such countries as approved by the European Commission as providing adequate level of data protection, or where the recipient is Privacy

Shield certified, or where we enter into legal agreements ensuring an adequate level of data protection.

#### **11. Retention of Personal Information**

If you have registered with an account through our Site or Services, we will retain your Personal Information during the period your account is active. In addition, we will retain your Personal Data for additional periods, to enable us to meet its legal obligations under applicable laws or regulations, such as Know-Your-Customer and Anti-Money Laundering regulations.

In addition, we may retain your Personal Information for longer periods, provided that retaining such information is necessary for the Company's legitimate interests, such as fraud prevention and record keeping, as well as for payment, billing or tax purposes.

#### **12. Your Rights**

You have a number of rights in relation to how we process your Personal Information. These include the right to:

- A. access the Personal Information that we may hold about you;
- B. rectify any inaccurate Personal Information that we may hold about you;
- C. have your Personal Information erased in certain circumstances, for example, where it is no longer necessary for us to process your Personal Information to fulfill our processing purposes; or where you have exercised your right to object to the processing;
- D. restrict the processing of your Personal Information where, for example, the information is inaccurate or it is no longer necessary for us to process such information or where you have exercised your right to object to our processing;
- E. object to the processing of your Personal Information which may be exercised in certain circumstances, for example, where we are processing your Personal Information for direct marketing purposes, or where your own legitimate interests outweigh ours; and
- F. have your data ported to a new service provider, in certain circumstances.

Please note that we may need to request specific information from you to help us confirm your identity and ensure your right to exercise any of your rights. This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **13. Other Sites**

A. This Privacy Policy and the use of your Personal Information only applies to the information you provide and the information that is collected by us as described herein. You are cautioned that if you disclose Personal Information or personally sensitive data through use of the Internet, such as through chat rooms, communities, bulletin boards, social media or other public online forums, this information may be collected and used by other persons or companies over which we have no control. It is your responsibility to review the privacy statements, policies, terms, and conditions of any person or company to whom you choose to link or with whom you choose to contract. We are not responsible for the privacy statements, policies, terms, conditions, or other content of any site not owned or managed by us.

B. We take all reasonable endeavors to protect and safeguard Personal Information, but there are protective measures you should take, as well. Do not share your Personal Information with others unless you clearly understand the purpose of their request for it and you know with whom you are

dealing. Do not keep sensitive Personal Information in your e-mail inbox or on Webmail. If you are asked to assign passwords to connect you to your Personal Information, you should use a secure password and always use two-factor authentication (2FA), where available. You should change your password regularly.

#### **14. Changes To Our Privacy Policy**

Any changes we make to our Privacy Policy in the future will be posted on our Website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

#### **15. Contact**

Questions, comments and requests regarding this Privacy Policy should be addressed to:

- SÖGUR Monetary Technologies
- Attn: Data Protection Officer
- Madison Building, Midtown, Queensway, Gibraltar GX11 1AA, Gibraltar
- [dpo@sogur.com](mailto:dpo@sogur.com)

We will make an effort to reply within a reasonable timeframe. Please feel free to reach out to us at any time. If you are unsatisfied with our response, you can reach out to the applicable data protection supervisory authority.