

PRIVACY POLITIC

This AtlantEX OÜ's (hereinafter AtlantEX OÜ may also be referred to as 'we' or 'us') privacy policy describes the personal data processing activities of AtlantEX OÜ as the controller (hereinafter 'Privacy Policy'). This Privacy Policy contains AtlantEX OÜ's communication from us to our data subjects (hereinafter our data subjects may also be referred to as 'you') through which we inform the data subjects of the ways AtlantEX OÜ processes their personal data. Thus, this Privacy Policy contains at least the information that Articles 13, 14 and 30 of the EU's General Data Protection Regulation (679/2016) (hereinafter 'GDPR') require of us.

1. CONTROLLER

Name: AtlantEX OÜ

Business ID: 14648093

Address: Masina 22, Tallinn 10144

Person in charge of data files: Anastasia Osipova

Contact details: info@atlant-ex.eu

2. CATEGORIES OF DATA SUBJECTS

AtlantEX OÜ's Privacy Policy concerns the following categories of data subjects:

1. Persons who use or wish to use AtlantEX or act as representatives of the legal entities that use or wish to use AtlantEX;
2. Persons who are employed by AtlantEX OÜ or seek employment from AtlantEX OÜ; and
3. Persons who contact us through email or other similar means.

3. CATEGORIES OF PERSONAL DATA

The data files concerning the data subjects of Sections 2.1 – 2.2 may contain the following categories of personal data:

- contact information, such as full name, address, phone numbers and e-mail addresses;
 - nationality, age, gender, title or profession and mother tongue;
 - employment history;
 - personal identification numbers;
 - bank account data;
 - cryptocurrency ownership data;
 - information relating to our Know Your Customer and anti-money laundering policies, such as the reason for the use of our services, the political status of a person and the identification data of a person;
 - user information, such as username, password and other unique identification browsing;
 - search information and other information concerning your use of our services;
 - information regarding the customer relationship, such as billing and payment information, product-, service- and ordering information, information regarding customer feedback, contacts and cancellation;
 - data about your device, such as information about the device you use, the type of your device, your IP-address and various diagnostic data;
 - location information, such as GPS-coordinates, data of your wireless connection (SSID) and strength of your Wi-Fi signal; and
 - possible other information gathered with the data subject's consent.
- The data files concerning the data subjects of Section 2.3 may contain the following categories of personal data:
- contact information, such as full name, address, phone numbers and e-mail addresses;

- data about your device, such as information about the device you use, the type of your device, your IP-address and various diagnostic data; and
- any other information provided by the person contacting us.

4. PURPOSE OF THE PROCESSING OF PERSONAL DATA

Personal data of the data subjects of Sections 2.1 can be handled for the following purposes:

- management and development of the customer relationship;
- customer service;
- for improving our user experience;
- profiling;
- marketing;
- to enable us to comply with our legal and regulatory obligations; and
- analysis and statistics.
- Personal data of the data subjects of Section 2.2 can be handled for the following purposes:
 - management and development of the employee and jobseeker relationships;
 - management of employment contracts and other related matters.
 - customer service;
 - for improving our user experience;
 - to enable us to comply with our legal and regulatory obligations; and
 - analysis and statistics.
- Personal data of the data subjects of Section 2.3 can be handled for the following purposes:
 - management of contacts;
 - customer service;
 - for improving our user experience;
 - marketing;
 - to enable us to comply with our legal and regulatory obligations; and
 - analysis and statistics.

5. LEGAL BASIS FOR PROCESSING

The controller has the right to process the personal data of the data subjects, depending on the situation at hand, based on the:

- consent received from the data subjects;
- performance of a contract in which the data subject acts as the contact person of the organizer;
- legitimate interests pursued by the controller or by a third party; or
- legal obligation to which the controller is subject.

6. REGULAR SOURCES OF INFORMATION

Information regarding the data subjects are regularly gathered:

- from data subjects themselves via phone, internet, e-mail or in other similar fashion;
- with cookies and other similar technology.

7. PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

1. We shall retain the data of the data subjects of Section 2.1 for a period of five (5) years following the end of customer relationships.
2. We shall retain the data of our employees of Section 2.2 for a period of ten (10) years following the end of their employment in our company, because we have a legal obligation to provide our former employees with references during that period.

3. We shall not retain the data of the jobseekers of Section 2.2 if the data subjects do not explicitly give us their consent to do so. Having received such a consent, we may retain the data of the data subjects for a period of six (6) months following explicit consent.
4. We shall retain the data of the data subjects of Section 2.3 for a period of one (1) year following the contact.
5. However, we may retain the data of the data subjects of Sections 2.1 – 2.3 for longer than is described above, where is necessary for the purpose of criminal investigation, pending judicial proceedings or securing the rights of parties subject to the reporting obligation or persons employed by them. The data subject concerned has no right of access to the data gathered.

8. CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The recipients of personal data may consist of the following categories:

- Parties who offer cloud services for data storage;
- Parties who offer accounting and auditing services; and
- Parties who help AtlantEX OÜ to fulfill its legal obligations.
- Banking partners and other parties involved in money transfers and transactions

9. DATA SUBJECTS' RIGHTS

The data subject has a right to use all of the below mentioned rights.

The contacts concerning the rights shall be submitted to the person in charge of the data file stated in Section 1. The rights of the data subject can be put into action only when the data subject has been satisfactorily identified.

Right to inspect

Having presented the adequate and necessary information, the data subject has the right to know what, if any, data the controller has stored of her/him into this register. While providing the requested information to the data subject, the controller must also inform the data subject of the register's regular sources of information, to what are the personal data used for and where is it regularly disclosed to

Right to rectify and erasure

The data subject has a right to request the controller to rectify the inaccurate and incomplete personal data concerning the data subject.

The data subject can request the controller to erase the personal data concerning the data subject, if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based on;
- the personal data have been unlawfully processed; or
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Let it be known that the data subjects' rights to rectify and erase data does not concern the data which the controller must retain due to its legal obligations.

If the controller does not accept the data subject's request to rectify or erase the personal data, it must give a decision on the matter to the data subject in a written form. The decision must include the reasons for which the

request was not granted. The data subject may refer the matter to the relevant authorities (the Data Protection Ombudsman in Estonia).

The controller must inform the party to whom the controller has disclosed the personal data to or has received the personal data from of the rectification or erasure of personal data. However, there is no such obligation where the fulfilment of the obligation would be practically impossible or otherwise unreasonable.

Right to restriction of processing

The data subject can request the controller to restrict the processing of the personal data concerning the data subject where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or
- the data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.
- If the controller has based the restriction of the processing of personal data on the abovementioned criteria, the controller shall give a notification for the data subject before removing the restriction.

Right to object

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning her/him for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Right to data portability

The data subject shall have the right to receive the personal data concerning her/him, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent or a contract.

Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. However, the data subject shall not have the aforementioned right if the decision is:

- necessary for entering into, or performance of, a contract between the data subject and us;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on the data subject's explicit consent.

Right to withdraw consent

Where the legal basis for the processing of personal data is the consent of the data subject, the data subject shall have the right to withdraw her/his consent.

10. RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

The data subject shall have the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to him or her infringes the GDPR. The complaint can be lodged in the Member State of her/his habitual residence, place of work or place of the alleged infringement.

11. COOKIES

Our service uses cookies which are used in order to make it more user-friendly and anonymously track your use of the Service. This is a standard policy regarding most websites.

Cookies are small text files that a website stores on your device when you browse that website. Cookies store data of your website use. Cookies are not used for identifying a person. You can control and/or remove cookies freely at the individual browser level. Instructions can be found for example in here: aboutcookies.org

In order to improve our service, we gather, measure and analyze data concerning your use of the service including (but not limited to) activity, page views, unique visitors and bounce rate.

Cookies Policy

When you visit this site, your device will automatically receive one or more cookies which are sent from our site to your browser. We also use tracking pixels and other similar tracking technologies to improve your user experience and to show you advertisements that are of potential interest. We will refer to these generally as 'cookies' from now on.

What are cookies?

A cookie is a small text file. Cookies are divided into session-based and permanent cookies. Session-based cookies are deleted when you end the browsing session. Permanent cookies stay on your device for a predefined amount of time, after which they are deleted. These cookies can renew each time when you visit a site that uses cookies.

Types of cookies

Cookies are divided in first-party and third-party cookies. First-party cookies belong to the web or mobile service that you are visiting. Third-party cookies belong to a third party, such as a web analytics program.

Why do we use cookies?

We use cookies to collect information on, for example, how you use the site, what kind of products and services interest you, or if you have visited our site before. We use this information to create even better user experience than before and to track the use of our services. The information is also used for developing our products and services, and to better target our marketing. Therefore our site is able to remember your settings and preferences in regards of the service use, and is able to offer content that we believe is interesting to you. With the information we collect with cookies we are not able, nor will we strive to recognize you.

12. PROFILING

We can make customer profiling with a crosscheck method. The data for crosscheck will be gathered from our own databases. We can for example profile customers based on their country codes. Profiling may have effects on the data subject's right to use our services. The data is being processed by our company employees.

13. SECURITY OF PROCESSING

We implement at least the following technical and organizational measures to ensure appropriate level of safety to the processing of personal data:

- the entry to our servers and other related databases is strictly limited;
- our servers are reduplicated and we keep backup copies of our data, which means that it is easy for us to ensure ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- we have the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.

14. DATA PROTECTION PRINCIPLES

AtlantEX OÜ uses all reasonable efforts to maintain physical, electronic, and administrative safeguards to protect personal information from unauthorized or inappropriate access, AtlantEX OÜ tech Capital Oy note that the Internet is not always a secure medium. AtlantEX OÜ restricts access to information about data subjects only to the personnel of AtlantEX OÜ that need to know the information e.g. for responding to inquiries or requests made by the data subjects.