

PRIVACY POLICY

Last update: 21.04.2021

This Privacy Policy (the «**Policy**») defines how GLTInvestment OÜ (address: Harju maakond, Tallinn, Kesklinna linnaosa, Roseni tn 13, 10111; registry code 16146912) (hereinafter referred to as the «**Company**», «**we**») collects, uses and distributes information about you obtained through the online interfaces used by the Company on the site located at trust-in-btc.com (the «**Site**»). Before you start using the Site, please read the Policy carefully. Using any functions, services and Site features, including just browsing, you declare that you have read, understood and agreed to abide by Policy conditions, including any mentioned therein special conditions and rules without any exceptions and reservations. This Privacy Policy and the Cookie Policy form part of the User Agreement. Please read this Policy carefully and accept it by placing next to the box «*I have read and accepted the terms of the Privacy Policy*».

By using the Site, the User automatically confirms their consent to this Policy in the applicable part. If the User does not agree with this Policy, we strongly recommend you stop using the Site.

Any reference to «You», «Your» etc. shall be interpreted as a reference to the User of the Site, the subject of this Policy, the Cookie Policy and the User Agreement.

This Policy is an integral part of the User Agreement, all terms and definitions used in this Policy that were not distinctly construed here shall be interpreted in the meaning specified in the User Agreement. If the User Agreement does not define this term either, this term is to be understood in accordance with the applicable law or generally accepted meaning.

If you have any questions regarding the provisions of this Policy, please contact us at support@trust-in-btc.com

1. TERMS FOR ACCESS TO THE SITE

By providing services through the Site and its services, the Company, acting reasonably and in good faith, presumes that the User:

- i. has all necessary rights permitting him/her to register and use this Site and related services;
- ii. provide accurate information about himself/herself to the extent necessary to use the Site.

2. PURPOSES OF PERSONAL DATA PROCESSING

The Company processes information about Users, including their Personal Data, in order to fulfill the Company's obligations to Users regarding the use of the Site.

For the purposes of the Site use **Personal Data** shall mean any information related directly or indirectly to a specific or identifiable individual (Personal Data subject), and **processing** shall mean any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of Personal Data.

3. TYPES OF PERSONAL DATA COLLECTED AND PURPOSE OF USE

3.1. TECHNICAL DATA

The Company automatically collects the following Personal Data when you use the Site:

- i. Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone settings, browser plug-in types and versions, operating system and platform;
- ii. Information about your visit to websites, including the full URL of unified resource pointers (URLs) on, through, and from websites (including the date and time); Products you viewed or searched for; page response time, loading errors, the length of time you visit or use certain pages, page interaction information (such as scrolling, clicking, and hovering), and methods used to navigate from the page.

This information is required to improve the operation of the Site, to fulfill our administrative purposes and to protect our business interests.

3.2. REGISTRATION DATA

In order to use the Site to manage your Tokens, a referral program, etc. You shall complete the Registration procedure. When you go to the Registration process, you will be asked to enter your registration details: email, password, and your secret word.

The purpose of processing such data is to identify the User. The entered e-mail/password pair is necessary and sufficient information for the User's access to the Site, and the secret word is necessary for some actions (changing or restoring the login and password, withdrawing digital assets). The User is not allowed to transfer its login and password to third parties and fully responsible for their safety, independently choosing the method of their storage. The User can allow the storage of login and password (using cookies) for further automatic authorization on the Site on the hardware and software used by the User.

3.3. TRANSACTION DATA

We receive information on transactions with our Tokens. This information includes payment details, such as your wallet number, Tx Hash/TxID.

4. PRINCIPLES OF DATA PROCESSING

The processing of Personal data is based on the principles of the GDPR:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimization
4. Accuracy
5. Storage limitations
6. Integrity and confidentiality
7. Accountability

5. DATA STORAGE

When collecting Personal Data of Users and Visitors, the Company provides recording, systematization, accumulation, storage, clarification (updating, modification), extraction of your Personal Data using databases located in the European Union (France).

The Personal Data that the Company processes would not be stored for longer than it is required for the relevant purposes. The Company will store your Personal Data for the whole period of your contractual relationship with the Company (period of existence of your Personal Account on the Site) and, to the extent permitted, after the termination of this relationship for as long as it takes to fulfill the purposes set out in this Policy.

Personal Data are stored in a form that allows identification of the subject of Personal Data for no longer than the purposes of Personal data processing require, unless the period for storing Personal Data is established by applicable law. The processed Personal Data are subject to destruction or depersonalization upon achievement of the processing goals or if it is no longer necessary to achieve these goals, unless otherwise provided by applicable law. In particular, the Company may store special information after fulfilling its obligations under agreements (after the Personal Account has been deleted), if it is required to comply with legal requirements, resolve disputes, prevent fraud or abuse, and to ensure compliance with the provisions of this Privacy Policy. Personal Data of Users and Visitors are stored for 12 months to analyze the behavioral activity on the Site of Users in an impersonalized form.

The storage period for the required data can be extended for tax compliance purposes. In particular, information on purchase of Plans and other services (where these services are available for purchase) can be stored by the Company for 5 years or until the tax audit is completed, depending on what happens later. Other Personal Data will be deleted 12 months after the deletion of the Personal Account is approved.

We will stop processing your data if you object to such processing of your data or if you have withdrawn your consent to processing that was previously received by the Company.

6. RIGHTS OF PERSONAL DATA SUBJECTS

The subjects of Personal Data processed by the Company shall have all rights and opportunities to exercise them in accordance with the GDPR, in particular:

1. The right to be informed

Art. 12-14 GDPR

You have the right to be informed about the collection and use of Your Personal Data, in particular, about purposes for processing of these data, retention periods for that Personal Data, and who it will be shared with. This information must be provided at the time we collect Personal Data from You. If we obtain Personal Data from other sources, we will inform You about this within a reasonable period of obtaining the data and no later than one month, unless You already have the information or if it would involve a disproportionate effort to provide it to You.

2. Right of access

Art. 15 GDPR

You have the right to obtain from the Company confirmation as to whether or not Personal Data concerning You are being processed, and, where that is the case, access to the Personal Data and the following information: the purposes of the processing; the categories of Personal Data concerned; the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organizations; where possible, the envisaged period for which the Personal data will be stored, or, if not possible, the criteria used to determine that period; the existence of the right to request from the controller rectification or erasure of Personal Data or restriction of processing of Personal Data concerning the data subject or to object to such processing; the right to lodge a complaint with a supervisory authority; the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

3. Right to rectification

Art. 16 GDPR

You have the right to have inaccurate Personal Data rectified or completed if it is incomplete under request for rectification made verbally or in writing.

4. Right to erasure ('right to be forgotten')

Art. 17 GDPR

The GDPR introduces a right for individuals to have Personal Data erased. You can make a request for erasure by contacting our Data Protection Officer, who has one month to respond to a request. Please take a note, the right is not absolute and only applies in certain circumstances, provided in Art. 17 GDPR.

5. Right to restriction of processing

Art. 18 GDPR

You have the right to request the restriction or suppression of your Personal Data. Where processing has been restricted, such Personal Data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. Please take a note, the right is not absolute and only applies in certain circumstances, provided in Art. 18 GDPR.

6. Right to data portability

Art. 20 GDPR

The right to data portability allows you to obtain and reuse your Personal Data for your own purposes across different services. It allows you to move, copy or transfer Personal Data easily from one IT environment to another in a safe and secure way, without affecting its usability. Please take a note, you have the right to have the Personal data transmitted directly from one controller to another, where technically feasible.

7. Right to object

Art. 21 GDPR

You have the right to object, on grounds relating to your particular situation, at any time to processing of Personal Data concerning you. We will no longer process Your personal data unless we have legitimate grounds for the processing.

You may revoke your consent to the processing of Personal Data at any time. Please be advised that the revocation will only take effect in the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

7. CONFIDENTIALITY AND SECURITY OF PERSONAL DATA

We take the privacy and security of your Personal Data very seriously. We have implemented technical and organizational security measures to ensure that data protection from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access and any other unlawful or unauthorized forms of processing is an integral part of all Personal Data processing in accordance with applicable law.

We do not disclose this information to third parties except with your consent, in accordance with the provisions of this Policy, or if we believe that such disclosure is necessary (for a legitimate purpose: for example, if you or other persons are threatened) under applicable law.

The Site may contain links to websites maintained by third parties whose information and privacy practices differ from ours (for example, during the integration with Exchange). We are not responsible nor liable for the information or privacy practices used by such third parties. We recommend you read the privacy policies of all third-party websites before using such websites or providing any Personal Data or any other information on or through such websites.

8. CHANGING THE POLICY

This Policy may be revised, changed, updated and / or supplemented at any time, without the need for prior notification to the User, at the Company's discretion. If we make such changes, we will post a notification on the main page of the Site. The date of amendment of this Policy will be displayed on the first page of the Policy. We strongly recommend that Users check the page regularly for changes. Each User agrees that it is his/her own responsibility to review from time to time the current version of the Policy.

By using the Site, the User automatically confirms their consent to this Policy in the applicable part. If the User does not agree with this Policy, we strongly recommend you stop using the Site.

After posting the updated version of the Policy on the Site, further use of the Site is considered as acceptance of the terms of the updated Policy.

GLTInvestment OÜ

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