

PRIVACY POLICY

Waypoint Ventures OÜ t/a Exchange Point, an Estonian company with registration number 14421900. Waypoint Ventures OÜ holds License Number FVT000275 for providing services of exchanging a virtual currency against a fiat currency and for providing a virtual currency wallet service. Waypoint Ventures OÜ has its registered address: Harju Maakond, Tallinn, Kesklinna Linnaosa, Parda tn 8-46, 101513, Estonia. (the “Company“, “we“, “us” and “our“) respects your privacy.

This policy explains our privacy practices for this website (the “Website“). It describes the ways your personal information is collected, stored and used. This policy does not govern the privacy practices related to our products and services other than the Website itself.

INFORMATION WE COLLECT

While completing our online registration form, we will require you to provide us with personal information, such as your name and contact details.

You must provide complete, accurate and correct details and you hereby confirm the details you provided are correct. You are not required by law to provide the Company with your personal details. However, if you provide false, incorrect, or out dated information, or only partial information, it may impair our ability to contact you.

When you provide the Company with personal details of another person, you represent and warrant that you received the other person’s explicit written consent to provide these details to the Company and use them according to this Policy.

The Company may collect information pertaining to your activity on the Website, including information or content that you have read, your session durations, the web pages you watched, services that were of interest to you, the location of the computer and the Internet Protocol (IP) address through which you had access to the Website and more.

Additionally, the Company may collect or use the assistance of third parties to collect and analyze anonymous, statistic or aggregative information related to your use of the Website.

PCI COMPLIANCE

At all times for the duration of the Term, Exchange Point will comply with the Payment Card Industry Data Security Standard (“PCI DSS“) and the payment card brands’ rules and regulations, including without limitation (i) providing data security reports as may be required by the credit card issuer; (ii)

paying any fines and penalties in the event Exchange Point fails to comply with requirements; and (iii) fully cooperating with, and providing access to, the credit card issuer or credit card brand to conduct a security review of Exchange Point' policies and procedures. Exchange Point will at its own expense undergo a PCI DSS compliance audit on no less than an annual basis and provide the results of such audit to You.

USE OF COLLECTED INFORMATION

We will store the information you provide and the information we collect about your activity on the Website in our database (the "Database").

We will use the information in accordance with this Policy and any applicable law, including for the following purposes:

- 1) To provide the services on the Website and to enable you to use them;
- 2) To develop and improve our products and services as a whole, and to improve and expand the services and content offered on the Website, to create new services and content which correspond to the requirements and expectations of the users of the Website and our customers and to modify or cancel existing services and content. The information used by the Company for this purpose will be mainly statistical information, and will not identify you personally;
- 3) To contact you occasionally, either by the Company or by anyone on our behalf, including by sending email messages, SMS messages and information related to our services and products;
- 4) To conduct research and surveys and other similar activities related to products and service development;
- 5) To analyze and provide statistical information to third parties. This information will not identify you personally;
- 6) For the orderly and proper operation and development of the Website;
- 7) To any other purpose specified in this Policy or in the Website's Terms of Use.

TRANSFER OF INFORMATION TO THIRD PARTIES

We may share personal information outlined in this policy, with others, in any of the following instances:

- 1) With our service providers in order to operate, maintain and enhance the Website and facilitate our email communications with you;

- 2) If you abuse your rights to use the Website, or violated any applicable law, your information may be shared with authorities or other third parties, if we believe it is necessary or justified;
- 3) With attorneys, courts and relevant third parties, in any case of a dispute, or legal proceeding of any kind involving you with respect to the Website;
- 4) If the operation of the Website is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition), provided that those entities agree to be bound by the provisions of this policy, with reasonably necessary changes taken into consideration;
- 5) We may share personal information with our corporate group entities (companies that we control, control us, or are under common control with us, whether directly or indirectly), but their use of such information must comply with the policy.
- 6) In any case other than above, your personal information will be shared with others only if you provide your explicit prior consent.
- 7) Merchant will not sell, purchase, provide, exchange or in any other manner disclose Account or Transaction data, or personal information of or about a Cardholder to anyone, except, it's Acquirer, Visa/Mastercard Corporations or in response to valid government demands.

ACCESSING, UPDATING OR DELETING YOUR PERSONAL INFORMATION AND OBTAINING A COPY OF IT

We respect your privacy rights and therefore you may contact us at any time and request:

1) to access, delete, change or update any Personal Information relating to you (for example, if you believe that your personal information is incorrect, you may ask to have it corrected or deleted);

or

2) that we will cease any further use of your personal information (for example, you may ask that we will stop using or sharing your personal information with third parties) or that we shall remove your personal information (subject to any other legal obligation that may require us to keep the information).

Please note that unless you instruct us otherwise we retain the information we collect for as long as needed to provide the services and to comply with our legal obligations, resolve disputes and enforce our agreements.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

If you wish to raise a complaint on how we have handled your personal information, please contact us directly at support@exchangept.io

If you are not satisfied with our response or believe we are collecting or processing your Personal Information not in accordance with the laws, you can complain to the applicable data protection authority.

COOKIE AND OTHER TRACKERS

We use various types of cookies and other types of web trackers, which help us to administer and operate the Website.

These trackers are used mainly to collect statistical information about your use of the Website;

We use cookies for Website analytics purposes, as explained above.

If you wish to block cookies, you may do so through your browser's settings. You can delete cookies that are already on your computer and you can set your browser to prevent them from being placed going forward. Please refer to the browser's help menu for further information.

Please also bear in mind that disabling cookies may adversely affect your user experience on the website.

We do not respond to browsers' "Do Not Track" requests.

You may have a right to submit a complaint to the relevant supervisory data protection authority, pursuant to the law.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, damaged or accessed in an unauthorised or unlawful way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. Depending on the nature of the risks presented by the proposed processing of your personal data, we will have in place the following appropriate security measures:

1. organisational measures (including but not limited to staff training and policy development);
2. technical measures (including but not limited to physical protection of data,

pseudonymization and encryption); and

3. securing ongoing availability, integrity and accessibility (including but not limited to ensuring appropriate back-ups of personal data are held).

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

CHANGES TO THIS POLICY

From time to time, the Company may change the terms of this policy. You agree to be bound by all changes made in the terms of this policy.

Continuing to use the Website will indicate your acceptance of the amended terms. If you do not agree with any of the amended terms, you must avoid any further use of the Website.

CONTACT US

You may contact us with any questions or comments, at: support@exchangept.io

PRIVACY INFORMATION

You may contact us with any privacy or GDPR information, at: support@exchangept.io