

## **Privacy Policy**

**CoiniGo**, powered by **MetaWorld Capital sp. z.o.o**

Effective Date: 1<sup>st</sup> December 2024

Last Updated: 1<sup>st</sup> December 2024

Version: 1.0

### **1. General**

1.1 This Privacy Policy governs and explains collection, processing, disclosing and safeguarding and usage of your Personal Information that you provide us when accessing or using our website (hereinafter – the “Website”) and any products or services offered by the us (hereinafter – “Services”).

1.2 We process personal data in accordance with the **General Data Protection Regulation (EU) 2016/679** ("GDPR"), the **ePrivacy Directive**, and, where applicable, **Regulation (EU) 2023/1114 on Markets in Crypto-Assets (MiCA)**.

1.3 “Personal Information” refers to information that identifies an individual, such as name, address, e-mail address, financial information, and banking details. We are committed to protecting and respecting your privacy. The purpose of this Privacy Policy is to describe:

- The types of Personal Information we collect and how it may be used;
- How and why, we may disclose your Personal Information to third parties;
- The transfer of your Personal Information;
- Your right to access, correct, update, and delete your Personal Information;
- The security measures we use to protect and prevent the loss, misuse, or alteration of Personal Information;
- Our retention of your Personal Information;
- This Privacy Policy also covers some basics of our use of cookies, however, for more details please see also our Cookie Policy.

1.4 We control the ways of collecting your Personal Information and determine goals for which We use Personal Information. We are a “data controller” within the meaning of the General Data

1.5 Protection Regulation (EU) 2016/679 (hereinafter referred to as “GDPR”) and other applicable European laws pertaining to data protection.

### **2. Types of Data We Collect**

2.1 The Company may collect the following categories of personal data:

**A. Identification and Contact Data**

- Full name
- Email address
- Phone number
- Wallet address (where identifiable)
- Billing address (if applicable)
- Government-issued identification (e.g., passport, national ID, driver's license) for KYC/AML purposes

**B. Technical and Usage Data**

- IP address
- Device identifiers
- Browser type and version
- Operating system
- Date and time of access
- Usage patterns, logs, and transactions

**C. Financial and Transactional Data**

- Cryptocurrency wallet addresses
- Transaction hashes
- Payment amounts
- Currency type
- Associated metadata (e.g., payment reference)

**3. How We Collect Your Data**

3.1 The Company collects the data from the following sources:

- Directly from you (e.g., when you register, submit KYC documents, or contact support)
- Automatically through your use of our services
- From third-party identity verification and compliance providers
- From business clients integrating our payment gateway

**4. Legal Bases for Processing**

4.1 We process your personal data based on the following legal grounds:

<b>Purpose</b>	<b>Legal Basis</b>
Provide and operate the service	Art. 6(1)(b) GDPR – Contract performance
Verify identity / AML / KYC	Art. 6(1)(c) GDPR – Legal obligation
Prevent fraud and abuse	Art. 6(1)(f) GDPR – Legitimate interests
Improve services and analytics	Art. 6(1)(a)/(f) GDPR – Consent / Legitimate interests
Marketing (with consent)	Art. 6(1)(a) GDPR – Consent
Compliance with MiCA obligations	Art. 6(1)(c) GDPR – Legal obligation

## 5. Data Sharing and Use

### 5.1 The Company may use your Personal Information to:

- Process your transactions. We will process your Personal Information only for the purpose(s) for which it has been provided to us;
- Fulfill our legal or regulatory requirements;
- Blockchain analytics providers (e.g., for AML screening)
- Regulatory authorities, law enforcement, and courts (where required)
- Cloud and IT service providers under appropriate contractual safeguards
- Our professional advisors (e.g., auditors, legal counsel)
- Verify your identity in accordance with the applicable legislation and our Anti Money Laundering policy, as well as address other law enforcement needs. We also may share your information with other financial institutions and with tax authorities if such actions are required from us due to any applicable legislation;
- Detect, investigate and prevent fraudulent transactions or unauthorized or illegal activities;
- Protect of our rights and property;
- Personalize your Services experience;
- Analyze Website usage and improve our Website and Website offerings. Analyzing and tracking data to determine the usefulness or popularity of certain content and to better understand the online activity of our Website users;
- Help us respond to your customer service requests and support needs, answer your inquiry or respond to a communication from you;
- Contact you about Services. The email address you provide may be used to communicate information and updates related to your use of the Services. We may also occasionally communicate technical notices, support or administrative notifications, company news, updates, promotions, and related information relating to similar products and Services provided by us;

- Administer a contest, promotion, survey or other features as will be more explained on the Website;
- Link, connect or combine Personal Information we collect from or about you with other Personal Information;
- Carry out any other purpose or reason for which the Information was collected. We do not perform behavioral tracking of a customer's activities on our Website or across different Websites, nor do we allow third-party data collection through our services.

## 5.2 Cross-Border Transfers:

If your personal data is transferred outside the European Economic Area (EEA), we ensure appropriate safeguards are in place (e.g., Standard Contractual Clauses (SCCs) or adequacy of decisions under Art. 45 GDPR).

## 6. Data Retention

6.1 Our Company retains your personal data only for as long as necessary to fulfill the purposes outlined in this policy, including for legal, regulatory, accounting, or reporting requirements. Generally:

- KYC/AML data: retained for **5–10 years** after the end of the business relationship
- Transaction data: retained for **7–10 years**
- Technical logs: retained for **6–12 months**, unless legally required otherwise

## 7. Your Data Protection Rights

7.1 Under the GDPR, you have the following rights:

- **Right to access** – Obtain a copy of your personal data
- **Right to rectification** – Request corrections to inaccurate data
- **Right to erasure** – Request deletion of your data (in certain cases)
- **Right to restrict processing** – Limit how we use your data
- **Right to data portability** – Receive your data in a structured, machine-readable format
- **Right to object** – Object to processing based on legitimate interests or for direct marketing
- **Right to withdraw consent** – If processing is based on consent

7.2 You may exercise these rights by contacting us at [datasupport@coinigo.com](mailto:datasupport@coinigo.com). You also have the right to lodge a complaint with your local Data Protection Authority (DPA).

## **8. Security Measures**

8.1 Our Company implements appropriate technical and organizational measures and uses a variety of security measures to ensure the confidentiality of your Personal Information, and to protect your Personal Information from loss, theft, unauthorized access, misuse, alteration or destruction.

8.2 These security measures include but are not limited to:

- Password protected directories and databases.
- Secure Sockets Layered (SSL) technology to ensure that your information is fully encrypted and sent across the Internet securely.
- Limited access to hosting servers using 2FA and traffic encryption.
- End-to-end encryption for sensitive data
- Multi-factor authentication (MFA)
- Regular audits and penetration testing
- Role-based access controls
- Data minimization and pseudonymization

8.3 All financially sensitive and/or credit information is transmitted via SSL technology and encrypted in our database. Only authorized personnel are permitted access to your Personal Information, and these personnel are required to treat the information as highly confidential. The security measures will be reviewed regularly in light of new and relevant legal and technical developments.

## **9. Cookies and Tracking Technologies**

9.1 We use cookies and similar technologies for essential functionality, analytics, and (with your consent) for marketing. Please see our Cookie Policy for details and your cookie preferences.

## **10. Automated Decision-Making and Profiling**

10.1 In certain cases, we may use automated systems (e.g., for transaction risk assessment or KYC verification). These processes may involve profiling but do not produce legal effects or significantly affect you without human intervention, unless explicitly permitted by law.

## **11. Third-Party Services**

11.1 Our Company's services may include integrations with third-party services. This policy does not cover their privacy practices. We encourage you to review their policies before interacting with such services.

11.2 Occasionally, the Website may provide references or links to other websites ("External websites"). We do not control these External websites, third party sites, or any of the content contained therein. You agree that we are in no way responsible or liable for External websites referenced or linked from our Website, including, but not limited to, website content, policies, failures, promotions, products, services or actions and/or any damages, losses, failures or problems caused by, related to, or arising from those sites.

11.3 External websites have separate and independent privacy policies. We encourage you to review the policies, rules, terms, and regulations of each site that you visit. We seek to protect the integrity of our site and welcome any feedback about External website information provided on our Website.

## **12. Changes to This Privacy Policy**

12.1 This Privacy Policy may be revised, modified, updated and/or supplemented at any time, without prior notice, at our sole discretion. We will notify you through email or through our platform. We encourage you to periodically review this policy.

## **13. Contact Us**

13.1 If you have questions or concerns about this Privacy Policy or our data practices, contact us at: [datasupport@coinigo.com](mailto:datasupport@coinigo.com)