

Cookie Policy

Effective date: 2025-12-01

1. Purpose and scope

1.1

This Cookie Policy explains how **HelvetiaChain GmbH**, trading as **Swissfox** (“Swissfox”, “we”, “us”, “our”), uses cookies and similar technologies on all websites, web applications, mobile applications, application programming interfaces, trading interfaces and related online services that we operate and control (together, the “Swissfox Services”).

1.2

This Cookie Policy describes:

- what cookies and similar technologies are;
- which categories of cookies and similar technologies we use;
- for which purposes we use them;
- the legal basis on which we process personal data obtained through them;
- with whom we share personal data obtained through them, including partners required to provide services to our users;
- how you can manage and withdraw your consent and configure your cookie settings; and
- your rights in relation to the use of cookies and similar technologies.

1.3

This Cookie Policy forms part of, and should be read in conjunction with, our **Privacy Notice** and our **Terms of Service**. In the event of a conflict between this Cookie Policy and the Privacy Notice in relation to cookies and similar technologies, this Cookie Policy shall prevail.

2. Controller and contact details

2.1

The controller responsible for the processing of personal data in connection with the use of cookies and similar technologies on the Swissfox Services is:

Helvetia Chain GmbH

UID: CHE-381.351.396

Gartenstrasse 6, 6300 Zug, Switzerland

2.2

HelvetiaChain GmbH operates the Swissfox cryptocurrency exchange platform and acts as a financial intermediary subject to Swiss obligations, including those under the Anti Money Laundering Act, and is supervised by a recognised self-regulatory organisation for financial intermediaries. ([VQF](#))

2.3

For any questions, requests or complaints regarding this Cookie Policy or our use of cookies and similar technologies, you may contact us at:

- Email: support@swissfox.com
- Postal address: Helvetia Chain, Gartenstrasse 6, 6300 Zug, Switzerland

3. Applicable Law

3.1 Our use of cookies and similar technologies is subject in particular to:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation - GDPR);
- Greek Law 4624/2019, which implements the GDPR within the Hellenic Republic and establishes measures for the protection of personal data;
- Greek Law 3471/2006 (Protection of personal data and privacy in the electronic communications sector), specifically Article 4 § 5, which incorporates the EU “ePrivacy” Directive regarding the storage of or access to information (cookies) on user terminal equipment;
- The relevant decisions, guidelines, and directives issued by the Hellenic Data Protection Authority (HDPA).

3.2 We design our cookie practices with a “compliance by design” approach so that users benefit from a level of transparency and control consistent with the requirements of the GDPR and the strict standards set by the Greek legal framework, wherever reasonably feasible.

4. Definitions

For the purposes of this Cookie Policy, the following definitions apply.

4.1

“Cookie” means a small text file that is placed on your device (for example, computer, smartphone or tablet) when you visit or use the Swissfox Services. Cookies are widely used in order to make websites and applications work, or to work more efficiently, as well as to provide information to the owners of the site or application.

4.2

“First party cookie” means a cookie that is placed by us or on our behalf and which can only be read by our domain.

4.3

“Third party cookie” means a cookie that is placed by a domain other than our domain, for example by an analytics provider, advertising network, social media platform, fraud prevention service or other partner.

4.4

“Session cookie” means a cookie that remains on your device only for the duration of a single browsing session and is deleted when you close your browser.

4.5

“**Persistent cookie**” means a cookie that remains on your device for the period defined in the cookie or until you delete it manually through your browser or device settings.

4.6

“**Similar technologies**” means technologies that store or access information on your device or track your activity in a similar way to cookies, such as:

- tracking pixels or web beacons;
- local storage and session storage;
- software development kits within mobile applications;
- device fingerprinting and similar technologies.

For simplicity, this Cookie Policy refers to cookies and similar technologies together as “cookies” unless a distinction is explicitly made.

4.7

“**Personal data**” means any information relating to an identified or identifiable natural person, as defined by applicable data protection law.

5. Categories of cookies and purposes

We use the following categories of cookies on the Swissfox Services.

5.1 Strictly necessary cookies

5.1.1

These cookies are essential to enable the core functionality of the Swissfox Services and to enable you to move around our websites and applications and use their features. Without these cookies, we would not be able to provide certain services that you request.

5.1.2

Strictly necessary cookies are used for purposes that may include:

- enabling basic site and application functionality, including page navigation and access to secure areas;
- authenticating you and maintaining your session once you have logged in;
- enforcing security measures, including prevention of fraudulent logins and abuse, rate limiting and load balancing;
- processing your cookie choices and recording your consent preferences;
- routing requests for availability, performance and resilience of the Swissfox Services.

5.1.3

Strictly necessary cookies are generally session cookies, but may in some cases be persistent where this is required for security or regulatory reasons.

5.1.4

Because these cookies are technically necessary for the functioning of the Swissfox Services,

they are placed on your device without requiring your prior consent. You may block or delete them by changing your browser settings, but this may affect the functioning of the Swissfox Services.

5.2 Preference and functionality cookies

5.2.1

Preference and functionality cookies allow the Swissfox Services to remember choices you make (for example, language, region, display preferences, default trading views) and provide enhanced, more personalised features.

5.2.2

These cookies may also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise.

5.2.3

Where required by applicable law, these cookies are placed only with your consent. If you refuse these cookies, some or all of these services may not function properly.

5.3 Performance and analytics cookies

5.3.1

Performance and analytics cookies collect information about how visitors use the Swissfox Services, for example which pages they visit most often, how users move around the site or application, and whether they receive error messages from web pages.

5.3.2

We use these cookies in order to:

- understand how the Swissfox Services are used and how users interact with features and content;
- measure and improve the performance and design of our interfaces;
- perform market segment analysis and improve user journeys;
- develop new products, services and functionalities.

5.3.3

The information collected by performance and analytics cookies is often aggregated. However, it may involve the processing of personal data such as:

- internet protocol address or other online identifiers;
- device identifiers;
- approximate location (for example, country or region);
- timestamps and usage metadata.

5.3.4

Where legally required, we place performance and analytics cookies only on the basis of your consent. If you withdraw your consent or object to these cookies, this will not impact your ability to use the Swissfox Services, but it may limit our ability to measure and improve performance.

5.4 Advertising and targeting cookies

5.4.1

Advertising and targeting cookies are used to deliver advertisements that are more relevant to you and your interests and to measure the effectiveness of our marketing campaigns.

5.4.2

These cookies may be set by us or by third party partners, for example:

- advertising networks;
- social media platforms;
- affiliate or referral partners.

5.4.3

Advertising and targeting cookies may:

- record your visit to our websites or applications and the pages you have visited;
- track your activity across different domains, devices and sessions;
- build or enrich user or audience segments;
- enable us to serve advertisements to you on third party sites or within third party applications;
- limit the number of times you see an advertisement;
- help measure the performance of marketing campaigns.

5.4.4

We place advertising and targeting cookies only on the basis of your explicit consent, where required by law. If you do not consent, we will not set such cookies and you will receive only non-personalised or contextual advertising where permitted by law.

5.5 Social media cookies

5.5.1

The Swissfox Services may incorporate social media features, such as buttons that allow you to share content on social media platforms or to connect your account with a social media identity provider.

5.5.2

These features may set social media cookies for purposes that include:

- enabling the feature to function;
- linking your activity on the Swissfox Services with the relevant social media platform;
- contributing to profiling or analytics performed by that platform.

5.5.3

These cookies are controlled by the relevant social media provider. We encourage you to consult their privacy and cookie notices for further information on their processing and your rights.

5.6 Security, fraud prevention and compliance cookies

5.6.1

We use certain cookies and similar technologies to strengthen the security posture of the Swissfox Services and to support our regulatory and compliance obligations, including financial crime prevention and market abuse monitoring.

5.6.2

These technologies may be used to:

- distinguish genuine user activity from automated or malicious activity;
- identify unusual or suspicious patterns of access;
- enforce platform rules and trading limits;
- support our obligations relating to anti money laundering, countering the financing of terrorism and sanctions monitoring, in conjunction with other data sources.

5.6.3

Depending on their intrusiveness, these cookies may be treated as strictly necessary or may require consent. Where consent is required by applicable law, we will obtain it through our cookie banner and settings interface.

6. Cookies used on the Swissfox Services

6.1

The specific cookies that are set when you use the Swissfox Services will depend on the part of the service that you access, your jurisdiction, your device and browser, and the choices you make in the cookie banner and settings.

6.2

We maintain a dynamic inventory of cookies and similar technologies that we rely upon, including:

- first party cookies operated by Swissfox;
- third party cookies operated on our behalf by service providers (for example, hosting, analytics, performance monitoring, customer support and security providers);
- third party cookies operated independently by partners (for example, social media, advertising networks and identity providers), in relation to which they are responsible for their own compliance.

6.3

The up-to-date list of cookies used, including their names, providers, purposes, categories and retention periods, is accessible at any time through our **Cookie Settings** interface in the footer or settings section of the Swissfox Services.

6.4

We may update our cookies and similar technologies over time in order to support new functionalities, security enhancements, changes in our regulatory environment or changes in our technology stack. Where required by law, we will obtain fresh consent for material changes that affect non-essential cookies.

7. Legal basis for processing personal data through cookies

7.1

We process personal data collected through cookies on one or more of the following legal bases:

- **Performance of a contract:** where the processing is necessary to provide you with services that you have requested, for example to maintain a secure authenticated session on the Swissfox trading platform.
- **Compliance with legal obligations:** where the processing supports our regulatory obligations, including those relating to the prevention of money laundering and financial crime, record-keeping, security and risk management.
- **Legitimate interests:** where the processing is necessary for purposes that are not overridden by your interests or fundamental rights and freedoms, such as improving the usability and security of the Swissfox Services, performing product analytics in a privacy protective manner, and ensuring the stable operation of our infrastructure.
- **Consent:** where we rely on your freely given, informed and unambiguous consent before placing or reading non-essential cookies on your device, in particular for advertising, targeting, certain analytics and social media cookies.

7.2

Where we rely on consent, you may withdraw your consent at any time as described in Section 8. Withdrawal of consent will not affect the lawfulness of processing carried out before such withdrawal.

8. Consent management and your choices

8.1 Cookie banner and granular controls

8.1.1

When you first access the Swissfox Services, and thereafter at appropriate intervals or when material changes are made, we will present a cookie banner that allows you to:

- accept all categories of cookies;
- reject all non-essential cookies; or
- manage your preferences at a more granular level by category.

8.1.2

We will not use pre-ticked boxes or implicit consent for non-essential cookies where explicit consent is required. The “reject” option will be presented in a manner that is no less prominent than the “accept” option, in line with current supervisory expectations. ([EDÖB](#))

8.2 Changing or withdrawing your consent

8.2.1

You can change your cookie preferences or withdraw your consent at any time by:

- opening the **Cookie Settings** link in the footer or settings section of the Swissfox Services; or
- adjusting the relevant toggles or sliders in our cookie management interface.

8.2.2

If you withdraw your consent for a category of cookies, we will cease to use the cookies within that category for future processing. Where feasible, we will also delete or anonymise existing cookies in that category.

8.2.3

Withdrawing consent or rejecting a particular category of cookies may impact your user experience but will not prevent you from accessing the core trading functionality of the Swissfox Services, except where a particular cookie is strictly necessary to provide a specific feature that you have requested.

9. Managing cookies through browser and device settings

9.1

Most browsers and devices allow you to manage cookies and similar technologies through their settings, including:

- blocking some or all cookies;
- receiving a notification when a cookie is being placed;
- deleting previously stored cookies.

9.2

The procedures for managing cookies vary by browser and device. You should refer to the support documentation for your browser or device for detailed instructions.

9.3

If you choose to block all cookies, you may not be able to access some or all of the Swissfox Services and some features may not function as intended.

10. Processing of personal data obtained via cookies

10.1

Depending on the category of cookie and the context, the personal data that we process may include:

- identifiers such as internet protocol address, device identifiers, login identifiers, session identifiers and cookie identifiers;
- device information such as operating system, browser type and settings, hardware model, unique device identifiers and network information;
- usage information such as pages viewed, links clicked, time spent on pages, trading interfaces accessed, features used, timestamps and other diagnostic data;
- approximate location data derived from internet protocol address or similar identifiers;

- in certain cases, information about how you interact with our communications or marketing messages.

10.2

We may combine information collected through cookies with:

- information that you provide to us directly (for example, during onboarding and know your customer processes);
- transaction data generated through your use of the Swissfox Services;
- information obtained from third party service providers and partners (for example, identity verification, payment services and fraud prevention providers).

10.3

We use such combined data to:

- provide and operate the Swissfox Services;
- secure our platforms and users;
- perform analytics and product development;
- comply with legal and regulatory obligations;
- personalise certain aspects of your experience where permitted by law and by your preferences.

11. Sharing of personal data collected through cookies

11.1

In line with our operating model, HelvetiaChain GmbH shares personal data, including data obtained via cookies where relevant, with carefully selected partners and service providers that are required to provide the Swissfox Services to you or to support our regulatory and operational obligations.

11.2

We may share such personal data with the following categories of recipients:

- **Group entities:** other entities within the HelvetiaChain or Swissfox group, to the extent necessary for internal administration, consolidated reporting, risk management, product development and regulatory purposes.
- **Information technology and infrastructure providers:** providers of hosting, cloud infrastructure, content delivery networks, cybersecurity services, performance monitoring, logging and error tracking.
- **Analytics and product insight providers:** providers that assist us in understanding how the Swissfox Services are used and help us improve features and user experience.

- **Customer support and communication providers:** tools and platforms that enable us to provide multichannel customer support, notifications, onboarding guides and similar services.
- **Identity verification, compliance and risk management partners:** partners that assist us with identity verification, anti money laundering controls, sanctions screening, fraud detection, transaction monitoring and market surveillance.
- **Payment, banking, custody and liquidity partners:** institutions and partners that support fiat on-ramping and off-ramping, custody, settlement, liquidity provision and related financial infrastructure necessary to provide the Swissfox Services.
- **Advertising, referral and affiliate partners:** where you have consented to advertising or referral cookies, partners that help us to run, measure and optimise marketing campaigns.
- **Professional advisers:** lawyers, auditors, consultants and other professional service providers who require access to personal data for the provision of their services.
- **Regulators, authorities and law enforcement:** where required by applicable law or regulation, or where necessary to protect our rights, users or systems, including supervisory authorities, tax authorities and law enforcement bodies.

11.3

Where third party providers act as processors on our behalf, we enter into written agreements with them requiring them to process personal data only in accordance with our documented instructions and to implement appropriate technical and organisational measures to protect personal data.

11.4

Where third parties act as independent controllers (for example, certain social media platforms or advertising networks), they are responsible for their own compliance with applicable law. We encourage you to review their privacy and cookie notices.

12. International data transfers

12.1

Due to the global nature of the Swissfox Services and of the financial and technology ecosystem, personal data collected through cookies may be transferred to, and processed in, countries outside Switzerland and outside the European Economic Area.

12.2

Where we transfer personal data to a country that does not provide an adequate level of data protection according to Swiss law or, where applicable, European Union law, we will ensure that appropriate safeguards are in place, for example:

- reliance on an adequacy decision;
- execution of standard contractual clauses or other standard data protection clauses approved by competent authorities;

- implementation of additional contractual, organisational and technical measures to ensure an essentially equivalent level of protection.

12.3

You may contact us for further information about international transfers and to request a copy of the relevant safeguards, subject to redactions necessary to protect business confidentiality and the security of our systems.

13. Retention of cookies and related personal data

13.1

Cookies are stored on your device for periods that depend on their type and purpose:

- session cookies are deleted when you close your browser or log out;
- persistent cookies are stored for a defined period which is specified in our Cookie Settings interface and which is appropriate for their purpose, typically ranging from a few days to a maximum of [insert longest period, for example twenty-four] months.

13.2

Personal data collected through cookies is retained for as long as necessary to fulfil the purposes set out in this Cookie Policy or in our Privacy Notice, including:

- providing the Swissfox Services;
- complying with legal and regulatory obligations (for example, record-keeping obligations that may require longer retention);
- resolving disputes and enforcing our agreements;
- security, fraud detection and prevention, and business continuity.

13.3

We may retain aggregated, anonymised or de-identified data for longer periods for statistical, research or analytical purposes, provided that such data can no longer be linked to an identifiable individual.

14. Your rights in relation to cookies and personal data

14.1

Depending on your jurisdiction and subject to applicable law, you may have the following rights in relation to personal data processed through cookies:

- right of access to personal data;
- right to rectification of inaccurate or incomplete personal data;
- right to erasure of personal data, where the conditions for erasure are met;
- right to restriction of processing;

- right to object to certain processing activities, including processing based on legitimate interests and, in particular, processing for direct marketing purposes;
- right to data portability, where applicable;
- right to withdraw consent at any time, where processing is based on consent.

14.2

You may exercise these rights by contacting us using the contact details set out in Section 2. We may need to verify your identity before responding to your request.

14.3

You also have the right to lodge a complaint with the competent supervisory authority. In Switzerland, this is the **Federal Data Protection and Information Commissioner**. If you are located in the European Union or the European Economic Area, you may also have the right to lodge a complaint with your local data protection authority.

15. Children

15.1

The Swissfox Services are not intended for persons who do not meet the minimum age or eligibility criteria set out in our Terms of Service. We do not knowingly use cookies to profile or target children.

15.2

If you believe that we have inadvertently collected personal data relating to a child through cookies in a manner that is inconsistent with this Section, please contact us so that we can investigate and, where appropriate, delete the data.

16. Changes to this Cookie Policy

16.1

We may update this Cookie Policy from time to time in order to reflect changes in:

- our use of cookies and similar technologies;
- our services, technology and business model;
- applicable laws, regulations and supervisory guidance;
- industry standards and best practices.

16.2

We will publish the updated Cookie Policy on the Swissfox Services and indicate the date of the latest revision at the top of the document. If changes are material, we may also take additional steps to inform you, for example by displaying a prominent notice, sending a notification or seeking renewed consent where required by law.

16.3

Your continued use of the Swissfox Services after the effective date of an updated Cookie Policy will constitute your acknowledgement of the updated Cookie Policy, without prejudice to your rights regarding consent for non-essential cookies.

17. How to contact us

17.1

If you have any questions, concerns, complaints or requests regarding this Cookie Policy or our use of cookies and similar technologies, you may contact us at:

- **Email:** support@swissfox.com
- **Postal address:** Helvetia Chain, Gartenstrasse 6, 6300 Zug, Switzerland

17.2

We will review and respond to your communication as soon as is reasonably practicable and in accordance with our legal obligations.