

# Privacy Policy and Statement

Last Updated: July 15, 2019

## 1. INTRODUCTION

Thank you for visiting Xaloedric.com (“Xaloedric” or the “Site”). Your use of the Site is being provided by one of the following parties (collectively, as “we”, “our”, or “us”):

- Xaloedric **USA Inc.** which is a U.S. corporation, if the user is a resident in a U.S. State and permitted to deposit or withdraw fiat and digital assets to commence digital asset trading;
- Xaloedric **USA Digital Assets Inc.** which is a U.S. corporation, if the user is a resident in a U.S. State and permitted to deposit or withdraw only digital assets to commence digital asset trading;

By visiting, accessing, or using Xaloedric.com and associated application program interfaces or mobile applications, you consent to the policies and practices of this Privacy Policy and Statement (the “Privacy Policy”), so please read them carefully.

This Privacy Policy explains what data we collect, how such data is used and stored, as well as how such data may be shared by us. If you do not wish your Personal Data (as defined below) to be used in the ways described in this Privacy Policy, you shall not use this Site or any services, software, API (application program interface), technologies, products and/or functionalities offered by this Site (“Service”).

## 2. DEFINITIONS

### Digital Asset

“Digital Asset” means a digital asset (also called a “virtual financial asset”, “convertible virtual currency,” “cryptocurrency,” “virtual currency,” “digital currency,” or “digital commodity”), such as bitcoin or ether, which is based on the cryptographic protocol of a computer network that may be (i) centralized or decentralized, (ii) closed or open-source, and (iii) used as a medium of exchange and/or store of value.

### Personal Data

“Personal Data” means any information which, either alone or in combination with other data, enables you to be directly or indirectly identified, such as your name, email address, username, contact details, identification number, location data, an online identifier such as IP address, device ID or one or more factors specific to the physical, economic, cultural or social identity of you.

## 3. WHAT PERSONAL DATA WE COLLECT

**Xaloedric** collects, processes, and stores Personal Data via your use of the Service or where you have given your consent. This Personal Data may include contact details, copies of identification documentation provided by you or derived from publicly accessible databases, your government identification number as well as information relating to your device or internet service (such as an IP address and a MAC number).

In addition, we conduct business and collect Personal Data from individuals and entities located within the European Economic Area (“EEA”). We are required to protect Personal Data processed in the EEA in accordance with the **General Data Protection Regulation (“GDPR”)**. To understand more about how we protect the data collected from individuals and entities located within the EEA, please see the details below.

We collect information you provide during the Xaloedric on-boarding process, which may be a completed, incomplete, or abandoned process. We also collect Personal Data when you communicate to us through customer support, subscribe to marketing communications, or correspond with us by phone, email or other communication channels. We collect, use, store, and transfer your Personal Data, which may include, without limitation, the following:

### Individual customers:

- Email address
- Mobile phone number
- Nationality
- Full legal name (including former name, and names in local language)
- Social Security Number (“SSN”), Passport number, or any government issued ID number
- Date of birth (“DOB”)
- Proof of identity (e.g. passport, driver’s license, or government-issued ID)
- Residential address
- Proof of residency
- Additional Personal Data or documentation at the discretion of our Compliance Team

### Corporate customers:

- Corporate legal name (including the legal name in local language)
- Incorporation/registration Information

- Full legal name of all beneficial owners, directors, and legal representatives
- Address (principal place of business and/or other physical locations)
- Proof of legal existence
- Description of the business
- Percentage of ownership for Individual/corporate owners
- Contact information of owners, principals, and executive management (as applicable)
- Proof of identity (e.g., passport, driver's license, or government-issued ID) for each individual beneficial owner that owns 10% or more of the institutional customer entity
- Personal Data for each entity's beneficial owner that owns 10% or more of the institutional customer entity (see the "Individual Customer" section above for details on what Personal Data we collect for individuals)
- Source of wealth
- Amount of fiat to be injected
- Amount of bitcoin projected to be injected

#### **4. COLLECTION AND TRANSFER OF DATA OUTSIDE OF THE EEA**

As outlined above, we collect Personal Data from customers located in the EEA. To facilitate the services, we provide to customers located in the EEA, we request explicit consent for the transfer of Personal Data from the EEA to outside of the area. If you are an individual located in the EEA and you decline to consent to such transfer, you will no longer be able to use Xaloedric and our services. You will have the ability to withdraw your digital assets and fiat currency; however, all other functionalities will be disabled.

#### **5. HOW WE USE YOUR PERSONAL DATA**

**Xaloedric** uses Personal Data to administer, deliver, improve, and personalize the Service for you and to comply with our legal and regulatory obligations. We may also use such data to communicate with you in relation to other products or services offered by Xaloedric and/or its partners.

You agree that Xaloedric has the right to share your Personal Data with:

- Member of our group, which includes our subsidiaries, holding companies and companies under common control including their respective contractors, affiliates, employees or representatives;
- Our service providers and other third parties who assist us in providing Service to you;
- Entities in connection with any financing, acquisition or dissolution proceedings which involve disclosing certain portion or all of our business or assets; and
- Law enforcement agencies and authorities, officers, regulators or other third parties to comply with any law, court order, subpoenas or government requests;

Other than as disclosed in this Privacy Policy, Xaloedric does not share your Personal Data with any other third parties unless required to do so by law or legal reporting obligations. This site may contain links to other third-party websites where their own privacy policies may apply and Xaloedric is not responsible for the privacy policies of such third-party websites.

Additionally, we have implemented international standards to prevent money laundering, terrorist financing and circumventing trade and economic sanctions, which requires us to undertake due diligence on our customers. This may include the use of third-party data and service providers which we will cross-reference with your personal information.

#### **6. HOW WE STORE YOUR PERSONAL DATA**

The data that we collect from you may be transferred to, stored at, a destination outside of the country of your residence. It may also be processed by staff operating outside of your residence who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing, except customers located in the EEA, as detailed above.

#### **7. ACCESS CORRECTION, AND DELETION OF YOUR PERSONAL DATA**

You have the right to obtain a copy of your Personal Data upon request and ascertain whether the information we hold about you is accurate and up-to-date. If any of your Personal Data is inaccurate, you may request to update your information. You may also request to delete your Personal Data, with exception that we may refuse your deletion request in certain circumstances, such as compliance with law or legal purposes. For data access, correction, or deletion requests, please contact our wallet support with the subject "DATA INQUIRY".

In response to data access, correction, or deletion request, we will verify the requesting party's identity to ensure that he or she is legally entitled to make such request. While we aim to respond to these requests free of charge, we reserve the right to charge you a reasonable fee should your request be repetitive or onerous.

#### **8. MARKETING**

We may communicate company news, promotions, and information relating to our products and services provided by Xaloedric. We may share Personal Data with third parties to help us with our marketing and promotional projects, or sending marketing communications. By using Xaloedric, you accept this Privacy Policy and you agree to receive such marketing communications.

Customers can opt out from these marketing communications at any moment. If you do not want to receive these communications, please send an email to [support@Xaloedric.com](mailto:support@Xaloedric.com)

For product related communications, such as policy/terms updates and operational notifications, you will not be able to opt out of receiving such information.

## **9. COOKIE USAGE**

While you access Xaloedric, we may use the industry practice of placing a small amount of data that will be saved by your browser (Cookies). This information can be placed on your computer or other devices used to visit us. This information helps us recognize you as a customer, collect information about your use of Xaloedric to better customize our services and better your experience. We may also use the information collected to ensure compliance with our Bank Secrecy Act (“BSA”) and Anti-Money Laundering (“AML”) program (“BSA/AML Program”), and to ensure your account security has not been compromised by detecting irregular or suspicious account activities.

Most browsers are setup to accept cookies automatically. Some Cookies expire when you finalize the session and other Cookies remain on your computer or other devices until deleted or expired. You have the option to decline the use of our Cookies, but this may affect the functionality of Xaloedric services or your user experience.

## **10. INFORMATION SECURITY**

We endeavor to protect Xaloedric and you from unauthorized access, alteration, disclosure, or destruction of Personal Data we collect and store. We take various measures to ensure information security, including encryption of the Xaloedric communications with

SSL; required two-factor authentication for all sessions; periodic review of our Personal Data collection, storage, and processing practices; and restricted access to your Personal Data on a need-to-know basis for our employees and vendors who are subject to strict contractual confidentiality obligations.

## **11. CONTACTING Xaloedric ABOUT PRIVACY QUESTIONS OR CONCERNS**

If you have any questions about this Privacy Policy or the use of your Personal Data, please contact us by sending an email to the For customers from EEA, you have right to make complaint for unresolved questions in relation to the collection, use or disclosure of

following address [support@Xaloedric.com](mailto:support@Xaloedric.com)

your Personal Data to the applicable supervisory authority within your jurisdiction.

## **12. CHANGES TO OUR PRIVACY POLICY**

We may update this Privacy Policy at any time by posting the amended version on this Site including the effective date of the amended version, so please check frequently to see if any updates and changes.

## **13. LANGUAGES**