

## PRIVACY POLICY

**UAB Star Ventures**, a company incorporated and existing under the laws of the Republic of Lithuania and its direct and indirect parent companies, subsidiaries, affiliates, and entities under common control (collectively, “**UABSV**”, “**we**”, “**us**” and “**our**”) take data protection and security seriously.

This Privacy Policy (the “**Policy**”) describes how we collect and process your personal data (the “**Personal Data**”) when you access content or use our trading platform (the “**Platform**”), which includes the website [www.uabsv.com](http://www.uabsv.com)(the “**Website**”), or on any of our other websites (such as [www.coinpayments.net](http://www.coinpayments.net)), including, without limitation, the technology integrated therein, web pages, features, content or applications we own or operate and/or when you use any of our application programming interfaces (“**APIs**”) or third party applications relying on such APIs, and any of our products or services (referred to collectively hereinafter as our “**Services**”). This Policy is incorporated by reference and forms part of our User Agreement.

This Policy supplements the other notices and is not intended to override them. Terms used within it shall have the meaning(s) given in the Regulation (EU) 2016/679 (General Data Protection Regulation (GDPR)), as applicable.

This Policy is designed to help you understand what kind of Personal Data we collect in connection with our services and how we will process and use this Personal Data. When you use our services, you are trusting us with your Personal Data. We understand this is a big responsibility and work hard to protect your Personal Data and put you in control.

Policy describes how the Company collects, uses, and discloses Personal Data that we obtain from you using the Platform and any Services provided through the Platform as well as other collected Personal Data, and how we use and disclose that Personal Data.

This Policy also helps you to understand your legal rights to your Personal Data and explains our lawful basis for processing Personal Data and who to contact should you have a query on the collection and use of your Personal Data.

### 1. UNDERSTANDING OF PRIVACY POLICY

By accessing or using our Services or the Platform, or by creating an account, you agree that you have read, understand the terms and conditions contained in this Policy. If you do not agree with or are not comfortable with any aspect of this Policy, you should immediately discontinue access or use of the Platform and our Services.

### 2. PERSONAL DATA WE COLLECT

Personal Data is any information which is related to an identified or identifiable natural person. This Policy covers all Personal Data that you voluntarily submit to us and that we obtain from our partners and service providers. This Policy does not apply to anonymized data, as it cannot be used to identify you. Personal Data means any information that is unique to you such as the

following personal information and documentation we, our partners or service providers may collect from you:

- **biographical information and contact information** such as full legal name, user ID, date of birth, birth place, age, nationality, citizenship, gender, signature, contact details (e.g. phone number and email address, etc.) and residential address;
- **supplemental identification information** such as government-issued identity documents (e.g. passport, driver's license, or state identification card, etc.), selfies, photographs and/or videos, social security number, employment information (e.g. company name), proof of residency, including utility bills and visa information;
- **verification and identification information** such as biometric data;
- **entity and institutional information** if you are an entity or institution such as entity government number, formation documents, "know your client" information, and personal identification information for all material beneficial owners of your business;
- **financial information** such as bank account information, payment card primary account number, credit card details, details about your source of funds, tax identification number, information about your income, assets and liabilities, and information relating to economic and trade sanctions lists;
- **wallet information** such as wallet addresses, self-custody, or multi-coin crypto wallet information, and information related to wallet integrations that you select;
- **transactional information made using our Services** such as trading account balances, custodial wallet activity, trading activity including the name of the sender, the name of the recipient, the amount, digital asset preferences, payment method, date, and/or timestamp, settings and preferences you select, your inquiries and our responses;
- **communication and referral information** (including emails, text messages, correspondence sent through the "contact" section of the Platform and call recordings) or information obtained from events or public social networking platforms and your contacts' phone or email addresses if you choose to refer people to us, along with our responses to you;
- **employment information:** includes your employment history, education background and income levels;
- **marketing information** includes your consent and preferences in receiving direct marketing from us and our third parties and your communication preferences;
- **other Personal Data or commercial and/or identification information** including Personal Data we, in our sole discretion, deem necessary to comply with our legal obligations, such as anti-money laundering laws; and
- **other Personal Data** or commercial and/or identification information you choose to provide us.

With your permission, we may also access other Personal Data on your device, such as your phone book, calendar, or messages, in order to provide Services to you. If authorized by you, we may also access profile and other information from services like X, Facebook or Instagram.

You are required to advise us of any changes in your Personal Data that may impact the Services we are providing. From time to time, you may be asked to verify or update your Personal Data.

### **Personal Data that is Collected Automatically**

- **Browser and Server Log Information:** We collect browser and server log information when you use the Platform, which may include (but is not limited to) your login details, the date and time of visits, the pages viewed, your IP address, time spent at the Platform, the websites you visit just before and just after the Platform, browser type and version, your time zone setting and browser plug-in types and versions.
- **App and Device Information:** We collect information about the computer or mobile device you use to access the Platform, including the hardware model, geo location/tracking details, browser fingerprint, operating system and version and other device characteristics and identifiers.
- **Telemetry Information.** If you use any of our open-source software, we may collect bandwidth download and upload speeds, the amount of free and used storage space on your device and other statistics about your device.
- **Usage Information.** If you use the Platform, we will collect metadata about how our Services are performing when you use them, the files you upload for storage and information about the transactions you make on the Platform or with our Services, such as the name of recipients, your name, digital asset amounts, click-stream data, instances in which you have used your private key to authenticate communications and/or the timestamp of transactions.
- **Personal Data Collected by Cookies and Other Tracking Technologies:** We and our service providers use various technologies to collect information when you interact with the Platform, including cookies, web beacons and other unique device identifiers. Cookies are small data files that are stored on your device when you visit a website, which enable us to collect information about your device, IP address, web browsers used to access the Platform, pages or features viewed, time spent on pages, mobile app performance and links clicked. Web beacons are graphic images that are placed on a website or in an email that is used to monitor the behaviour of the user visiting the website or sending the email. They are often used in combination with cookies.

### **Personal Data we obtain from Affiliates, Subsidiaries, Partners and Third Parties**

Personal Data we obtain from our affiliates, subsidiaries, partners and third parties include the following:

- Information from our service providers including those who assist us with ID verification, AML, fraud, and security compliance including information confirming your identity, fraud, security, sanctions, AML and other risks and other relevant data;
- Information about you from publicly available sources including public databases, government records and sanctions lists;
- Personal Data from our affiliates, subsidiaries, business and marketing partners, other third parties and social media platforms such as your user name, account information and what other services and products you use;
- Personal Data from third parties like digital asset exchanges or banks that you use to transfer digital assets or money to us or our business partners, including your name, address and account details;

- anonymized or de-identified information about you, such as how you found our website from advertising, marketing, analytics providers and search information providers;
- Personal Data during the credit referencing process including your employment and credit history from credit reference agencies; and
- public blockchain data, including timestamps of transactions or events, transaction IDs, digital signatures, transaction amounts, and wallet addresses.

### 3. HOW WE COLLECT PERSONAL DATA

We obtain Personal Data about you in a number of ways through your use of our products and Services, the Platform, the account opening process, when you subscribe for events, news and updates or from Personal Data provided in the course of on-going support service communications including: (a) Personal Data that you voluntarily disclose or that is collected on an individual basis; (b) Personal Data collected automatically when you use the Platform or our Services; and (c) Personal Data we receive about you from other sources.

We will only collect and process Personal Data for specified and lawful purposes and only to the extent it is appropriate and necessary for one or more of the purposes outlined in this Policy, namely for the purpose of providing and improving our Services, to protect the security and integrity of our Platform and/or to comply with our legal and regulatory obligations. You may be asked to provide Personal Data anytime you are in contact with us. Any Personal Data you provide to us that is not required is voluntary. You are free to choose whether to provide us with the types of Personal Data requested, but we may not be able to serve you as effectively or offer you all our Services if you choose not to share certain Personal Data with us.

### 4. HOW YOUR PERSONAL DATA IS USED

The primary purpose for collecting your Personal Data is to provide you with the best possible user experience and Services and to safeguard the security and stability of our systems. In general, we use Personal Data to create, develop, operate, deliver, and improve our Services, content, and marketing, to comply with our legal obligations, for anti-fraud purposes and for loss prevention.

For each of the purposes set forth below for which we process Personal Data, we rely on any one or more of the following legal justifications:

- Performance of a Contract** – we rely on this legal basis where we process your Personal Data in order to discharge contractual obligations we owe you for purpose of service delivery.
- Legitimate Interest** – we rely on this legal basis where we need to process your Personal Data in order to meet our own requirement to operate, manage, and develop our business or to safeguard the legitimate interests pursued by us or by a third party (provided there is a balance between your interests and our interests). A legitimate interest is when we have a business or commercial reason to use your Personal Data.
- Legal Obligation** – we rely on this legal basis where we use your Personal Data for the purpose of legal and regulatory compliance. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

- (d) **Legal Proceedings** – we rely on this legal basis where it is necessary to handle your Personal Data for the purpose of obtaining legal advice; in connection with any legal proceeding; or to exercise or defend legal rights in accordance with applicable data protection legislation.
- (e) **Consent** – we use your Personal Data based on your consent.

We may process your Personal Data for more than one legal basis depending on the specific purpose for which we are using your Personal Data. Please contact us if you need details about the specific legal basis, we are relying on to process your Personal Data.

Specifically, we will process your Personal Data on the following legal bases for the following purposes:

<b>Purpose of processing your Personal Data</b>	<b>Legal basis</b>	<b>Categories of Personal Data</b>
To create and maintain your account with us, to provide, maintain, deliver or improve our products and Services and the Platform and to enable the completion of the client on-boarding process.	Performance of a Contract	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information including biometric data, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
To administer our products and Services, to provide you with information in respect of our products and Services and review your ongoing needs, to troubleshoot our products and Services, to improve our products and Services including quality control and staff training and to develop new products and Services to ensure we can provide you with the best user experience and accurate information.	Performance of a Contract and Legitimate Interest	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information including biometric data, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
To manage, maintain and develop our relationship with you and provide you with customer support and service	Performance of a Contract and Legitimate Business Interest	Biographical information and contact information, financial information, wallet and transactional information,

<b>Purpose of processing your Personal Data</b>	<b>Legal basis</b>	<b>Categories of Personal Data</b>
including, without limitation, communicating with you, answering your inquiries or responding to a communication from you and sending you technical notices, support or administrative notifications.		PEP information (where relevant), verification and identification information including biometric data, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
To personalize our products and Services, and your experience on the Platform, including tailoring the content and recommendations we provide to you and to monitor and analyze trends, usage and activities in connection with the Platform, to determine the usefulness or popularity of certain content and to better understand the online activity of users of the Platform.	Legitimate Interest	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.

<b>Purpose of processing your Personal Data</b>	<b>Legal basis</b>	<b>Categories of Personal Data</b>
For research and development purposes including developing new products or services, to conduct surveys and data analysis, to market our products and Services and to link, connect or combine Personal Data we collect from or about you with other Personal Data.	Legitimate Interest and Consent where you have agreed to participate in surveys, have requested information on products or Services or agreed to receive marketing messages directly.	Biographical information and contact information, financial information, wallet and transactional information, verification and identification information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.

To update and verify your Personal Data in accordance with relevant applicable law including anti-money laundering compliance frameworks and to notify you of changes to our products or Services and/or to laws and regulatory rules and regulations.	Legal Obligation and Legitimate Interest	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
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To engage, utilize or for you or us to receive services from business partners or third parties including without limitation digital asset wallet services, digital asset conversion services including digital asset to digital asset and digital asset to fiat conversion services, administrative, legal, tax, compliance, insurance, IT, debt-recovery, analytics, credit reference, identity verification, research or other services.	Legitimate Interest	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
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To pay our partners and third party service providers and to receive payments from them.	Legitimate Interest	Biographical information and contact information, financial information, wallet and transactional information, verification and identification
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		information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
To ensure our compliance with all relevant legal or regulatory requirements and to meet our regulatory and legal obligations including conducting or arranging for the conducting of credit or identity checks and for the purposes of identity verification, compliance with court orders, tax laws or other reporting obligations and anti-money laundering controls.	Legal Obligation and Legal Proceedings	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
To promote the safety, security and integrity of our Services including verifying accounts and related activity, to enforce the terms and conditions of our User Agreement and other agreements we may have with you or third parties including, without limitation, if we believe your actions are inconsistent with our User Agreement, our other agreements or policies, to find and address violations of our User Agreement or policies, to investigate suspicious activity, detect, prevent and combat harmful or unlawful behavior, detect fraudulent behavior and to maintain the integrity of our Services.	Performance of a Contract, Legal Obligation and Legitimate Interest	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
To assess risks including legal and financial risks, it is necessary for us to protect, our interests, rights, property and safety, or that of others.	Legitimate Interest, Legal Obligation	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information,



		Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
To comply with applicable laws, subpoenas, court orders, law enforcement requests, other judicial process, or the requirements of any applicable regulatory authorities.	Legal Obligation and Legitimate Interest	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
To enforce and defend our rights including initiating legal claims, preparing our defense in litigation procedures, addressing legal or administrative proceedings whether before a court or a statutory body and to investigate or settle issues, enquiries and/or disputes.	Legitimate Interest and Legal Proceedings	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
For internal business purposes and recordkeeping, to invoice and process payments, to monitor and manage the performance of our business operations and to analyze performance and generate internal reports.	Legitimate Interest and Legal Obligation	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.

<p>To devise and facilitate the effective management, administration and strategy of our business, including in relation to matters such as business planning, budgeting, and forecasting and the pricing of our products and Services.</p>	<p>Legitimate Interest</p>	<p>Financial information, wallet and transactional information, Personal Data we collect automatically, Personal Data we obtain form our affiliates, subsidiaries, partners and third parties and other Personal Data.</p>
<p>To administer our business effectively such as through means and processes we undertake to provide for our IT and system security, preventing potential crime and to ensure asset security and access controls.</p>	<p>Legitimate Interest, Legal Obligation</p>	<p>Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain form our affiliates, subsidiaries, partners and third parties and other Personal Data.</p>
<p>To ensure network and information security including processing your Personal Data in order to enhance security, monitor and verify identity or service access, combat spam or other malware or security risks and to comply with applicable security laws and regulations.</p>	<p>Legal Obligation and Legitimate Interest</p>	<p>Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain form our affiliates, subsidiaries, partners and third parties and other Personal Data.</p>
<p>In order to detect, investigate and prevent fraud or other illegal or unauthorized transactions or activities.</p>	<p>Legal Obligation and Legitimate Interest</p>	<p>Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain form our affiliates, subsidiaries, partners and third parties and other Personal Data.</p>

To facilitate a reorganization, an asset or business sale, corporate acquisition, merger, or other transactions.	Legitimate Interest	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.
To carry out any other purpose or reason for which the Personal Data was collected, for which we have received your consent or for which we or our partners or third parties have a legitimate interest.	Consent and Legitimate Interest	Biographical information and contact information, financial information, wallet and transactional information, PEP information (where relevant), verification and identification information, Personal Data we collect automatically, Personal Data we obtain from our affiliates, subsidiaries, partners and third parties and other Personal Data.

**5. SHARING OF PERSONAL DATA**

We will never sell or rent your Personal Data. We will only share your Personal Data if and to the extent appropriate or necessary to do so for one or more of the purposes outlined in this Policy or our User Agreement and will ensure that the sharing of such Personal Data is kept to the minimum necessary. To the extent we share your Personal Data will vary depending on your circumstances and your relationship with us, but we may share your Personal Data with one or more of the following categories of recipients:

- other members or associates of your organization;
- our current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with us or our offices internationally;
- advisors, contractors, consultants, agents, service providers, business partners and other third parties (who may store your Personal Data within their own systems) that we have partnered with or perform work for us including those who support our business operations, those who provide ancillary services which complement the Services we provide, and specialist advisors who have been contracted to provide us with

administrative, financial, legal, tax, compliance, insurance, IT, debt-recovery, analytics, research or other services;

- users of interactive areas of the Platform or our social media platforms like our online forums if you choose to share or display your Personal Data on them publicly, such as your username and any content you post;
- third parties, advisors, agents and other service providers in connection with a reorganization, change of ownership, merger or transfer of all or part of our assets or business, or if we do a financing or are involved in an acquisition or any other situation where Personal Data may be disclosed or transferred as one of our business assets;
- government departments and agencies, law enforcement officials, regulators, courts, tribunals or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure or request, or when we believe in good faith that the disclosure of Personal Data is necessary to prevent physical harm or financial loss, to report suspected illegal activity, to investigate violations of this Policy, our User Agreement or any other applicable policies or if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process; and
- third parties where aggregate Personal Data is disclosed which cannot be reasonably be used to identify you.

We use reasonable efforts to ensure that third parties we partner with are bound by the terms of this Policy or a similar policy. Your Personal Data may be transferred to or accessed by the recipients described above from countries located outside European Economic Area (EEA). Such countries may have different and potentially less stringent standards relating to data protection than your country. In these cases, we will take appropriate steps that are within our control to ensure that adequate legal safeguards are in place for your Personal Data which are shared with such recipients. Courts, law enforcement and security agencies of these jurisdictions may be able to use legal processes to access your Personal Data.

In all such transfers, we may rely on standard contractual clauses or other applicable security measures for data transfer outside EEA and will protect and process your Personal Data as described in this Policy.

## **6. SOCIAL SHARING FEATURES**

The Platform may offer social sharing features, links to social media and other integrated tools. Your use of such features enables the sharing of information with your contacts or the public, depending on the settings you use with the entity that provides the social sharing feature or social media. Please visit the privacy policies of the entities that provide these features to obtain more information about the purpose and scope of data collection and the processing of such data by such entities.

## **7. HYPERLINKS AND THIRD-PARTY SITES**

The Platform may contain links to other third-party websites that may collect Personal Data about you, including through cookies or other technologies. If you link to another website, you will leave the Platform and this Policy will not apply to your use of and activity on those other websites. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any Personal Data that is submitted to or collected by these third parties.

## **8. PRIVACY WHEN USING DIGITAL ASSETS AND BLOCKCHAINS**

Your transactions involving Bitcoin, Ethereum and other digital assets may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

Because blockchains are decentralized or third-party networks which are not controlled or operated by us, we are not able to erase, modify, or alter Personal Data from such networks.

## **9. MARKETING AND ONLINE COMMUNICATION**

We may process your Personal Data to send you marketing communications (e.g., email marketing, exclusive offers, etc.). In some cases, we will obtain your explicit consent to do so. In other instances, we may rely on legitimate business interests to send you such communications, in accordance with applicable data protection laws.

If you are a *new* customer, we will contact you by electronic means (email or SMS) for marketing purposes only if you have consented to such communication. If you are a *current* customer, we will only contact you by electronic means with information about our Services that are similar to those which were the subject of a previous sale or negotiations of a sale to you.

If you do not want us to use your Personal Data for direct marketing purposes or to pass your Personal Data on to third parties for marketing purposes, you can withdraw your consent by logging into your account or by contacting us at [contact@uabsv.com](mailto:contact@uabsv.com). Direct marketing includes any communications to you that are only based on advertising or promoting products and services.

As mentioned above, you can opt out of our marketing communications anytime. However, certain electronic communications between us and you are necessary for usage of our Services including login notifications, withdrawal confirmations, deposit notifications and 2-Factor Authentication (this can be replaced with Google Authenticator, Authy, or Trezor). We highly recommend that you do not turn off 2-Factor Authentication as this provides the maximum amount of security for your account.

## **10. PROTECTION OF PERSONAL DATA**

We take reasonable administrative, physical and electronic measures designed to safeguard and protect your Personal Data from unauthorized access or disclosure. This includes utilizing Secure Sockets Layer (SSL) software, which encrypts the Personal Data you input, and storing your Personal Data in encrypted form behind a firewall designed to block access from outside our network. However, no security or encryption method can be guaranteed to protect information

from hackers or human error, no computer security system is entirely fool-proof, and the Internet is not a fully secure method of transmitting information. As a result, while we implement appropriate security measures to protect your personal data, we cannot guarantee absolute security for data you submit to or receive from us over the Internet. Unauthorized access, interception, or data alteration may still occur due to the inherent risks of online communication. In the event of a security breach affecting your personal data, we will take appropriate measures in accordance with applicable data protection laws, including GDPR, to mitigate risks and notify relevant authorities and affected individuals as required.

We cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of your Personal Data will not occur. Please recognize that you play a vital role in protecting your own Personal Data. When providing Personal Data on the Platform or accessing or using our Services, you should choose a password of sufficient length and complexity, not reveal this password to third parties, and to immediately notify us if you become aware of any unauthorized access to or use of your account.

Furthermore, we cannot ensure or warrant the security or confidentiality of Personal Data you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that Personal Data once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us at [contact@uabsv.com](mailto:contact@uabsv.com).

## **11. RETENTION PERIOD OF PERSONAL DATA**

Personal Data we collect may be stored or processed on computers located in any country where we or our partners provide Services or carry on business. We will only retain your Personal Data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting obligations or to resolve disputes. This is a case-by-case determination that depends on things such as the nature of the data, why it is collected and processed, and relevant legal or operational retention needs. We also keep certain Personal Data where necessary to protect the safety, security and integrity of our Services, customers, and users. For example, we may retain certain Personal Data for accounting and security purposes even after our business relationship with you has ceased. We may need to maintain records for a significant period of time after you cease being our client for legal or regulatory reasons, for example, when we need to retain Personal Data to help manage a dispute or legal claim. Additionally, we are subject to certain anti-money laundering laws which may require us to retain your Personal Data for a period of time after our business relationship with you has ended.

## **12. RIGHTS YOU HAVE WITH RESPECT TO YOUR PERSONAL DATA**

You have certain individual rights regarding the Personal Data that we collect and process about you through the Platform.

Most web browsers are set to accept cookies as a default. You may wish to opt out by turning off cookies (please refer to the help menu on your browser); however, switching off cookies may restrict your use of the Platform.

As mentioned, you may also opt out of receiving promotional communications from us at any time by following the instructions in those communications. If you opt out, we may still send you non-

promotional communications, such as technical notices, support or administrative notifications or Personal Data about your account (if you have one).

Pursuant to applicable data protection laws, you may have certain legal rights in respect of the Personal Data which is processed by us including the right to:

- Request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate interest to process your information which override your rights and freedoms.
- Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent;

- Not to be the subject only to automated processing, including profiling. You have a right to demand that processing of your Personal Data would be reviewed by a real person and to object to the decision made by automated means.
- To submit an appeal on the actions or inactions of us, related to the implementation of the data subject's rights to the Data Protection authority that is located in member state of the European Union where you reside; and
- You are entitled to compensation, which you must apply for to the competent court that is located in member state of the European Union where you reside, if you have suffered damage as a result of a violation of the data subject's rights

Please note, however, that your rights are subject to certain exceptions and conditions. Specifically, we may need to further process and retain your Personal Data to perform a contract with you or your company or organization, to protect our legitimate interests (such as the establishment, exercise or defense of legal claims) or to comply with legal requirements. To the extent permitted by law, namely, to protect the rights and freedoms of others or to protect our own legitimate interests, we may therefore refuse to satisfy your request or we may satisfy your request only on a restricted basis. For example, we can only delete your Personal Data to the extent permitted by applicable law, regulatory requirements, and our compliance obligations. Even if we fulfill your request for deletion, certain Personal Data may remain in our systems for a limited time due to backup or archiving processes, or where retention is required for legal, accounting, or security purposes. As such, we cannot guarantee that all Personal Data will be fully deleted or that all records will be permanently removed from our systems immediately upon your request. We will make reasonable efforts to comply with your request in accordance with applicable data protection laws and to ensure that any Personal Data no longer required for legitimate purposes is deleted as soon as legally permissible.

If we determine that we cannot respond to any request in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, we will take commercially reasonable steps to verify your identity before responding to any request under this provision, including complying with any applicable legal requirement for verifying your identity.

We will respond to your requests without undue delay and in any event within one month of receipt of the request. However, period may be extended up to two months as per circumstances designated by GDPR.

You can also complain to the State Data Protection Inspectorate if you are unhappy with how we have used your data. We would, however, appreciate the chance to deal with your concerns before you approach the State Data Protection Inspectorate so, please contact us in the first instance.

The State Data Protection Inspectorate's address:

L. Sapiegos str. 17, LT-10312 Vilnius, Lithuania.

Email: [ada@ada.lt](mailto:ada@ada.lt).

Website: <https://vdai.lrv.lt/en/>

If you wish to exercise any of your rights, you should contact us at [contact@uabsv.com](mailto:contact@uabsv.com).



### **13. CHILDREN'S PERSONAL DATA**

We do not knowingly collect Personal Data from any person under the age of 18. If a user submitting Personal Data is suspected of being younger than 18 years of age, we will require the user to close his or her account and will not allow the user to continue to use our Services. We will also take steps to delete the Personal Data as soon as possible. Please notify us if you or anyone you know is under the age of 18 and are using our Services so we can take action to prevent access to our Services.

### **14. HOW TO CONTACT US**

If you have questions or concerns regarding this Policy or if you have a complaint, please contact us by our appointed Data Protection Officer (DPO) at [contact@uabsv.com](mailto:contact@uabsv.com). If we are unable to satisfactorily address your concerns, you have the right to communicate with a relevant supervisory authority. We can direct you to the relevant supervisory authority in your jurisdiction.

### **15. CHANGES TO THIS POLICY**

We reserve the right to alter, amend or modify this Policy from time to time, in our sole discretion. We will provide you with notice of such changes by sending you an email, providing notice on the homepage of the Website and/or by posting the amended Policy on the Platform and updating the "Last Updated" date at the bottom of the Policy. The amended Policy will be deemed effective immediately upon posting on the Platform. Your continued use of the Platform and/or our Services constitutes your agreement to be bound by any such changes to this Policy. If you do not agree with this Policy or any amendment to it, you should discontinue access and use of the Platform and our Services.

Last Updated: March 17, 2025