

Dacxi Order Platform— Privacy Policy

Version 2020.08

The Dacxi Order Platform is operated by Dacxi Limited OÜ.
For the purposes of this Privacy Policy, Dacxi Limited OÜ is also the data controller.

Dacxi will value your privacy and strive to protect your personal information. The term “personal information” refers to any information from which your identity could be reasonably ascertained. In this Privacy Policy, personal information is also known as ‘personal data’ for data subjects in the European Union (EU). We will only collect and use your personal information in accordance with this Privacy Policy and the terms of your agreement with Dacxi (Terms and Conditions). If you need further information, please contact hello@dacxi.com.

By visiting, accessing, or using the Dacxi Order Platform, you have confirmed that you are 18 years old or older, have the legal capacity to consent to this Privacy Policy, and agree to be bound by this Privacy Policy.

The personal information we collect

The personal information we collect enables us to deal with your enquiries, open and operate an account for you, or to generally provide you with our products and services and comply with laws and regulations. We may need to and may be required to record, hold, use, disclose and store the following information:

- Personal information used to establish your identity and background.
- Personal information provided when you use the Dacxi Order Platform

How we collect your personal information

Dacxi obtains personal information in various ways:

- When you register an account with Dacxi through the website.
- When you respond to marketing initiatives from Dacxi or its independent marketing partners.
- Through the information provided by you when using our products or services.
- Through the information provided by you when taking part in customer surveys, competitions and promotions.
- We analyse information based on your transactions. Dacxi also analyses the payments which are made to/from your account.
- We monitor calls, emails and letters when you call our help desk or send queries.
- We may collect data and information from third parties like credit reference agencies or regulatory and enforcement agencies or from other sources for which you have given consent to disclose information relating to you and/or where information is not otherwise restricted.

How we use your personal information

Personal information is used for the following purposes:

- To verify your account in accordance with Know Your Customer (KYC) and Anti-Money Laundering (AML) regulations.
- To assess your application for our products and services.
- To manage and maintain your account with us.
- To better manage our business and your relationship with us.
- To enable your referrer to understand your information.
- To improve our products and services and to develop new products and services.
- To notify you about benefits and changes to the features of products and services.
- To administer offers, competitions and promotions.
- To respond to your enquiries and complaints and to generally resolve disputes.
- To update, consolidate and improve the accuracy of our records.
- To produce data, reports and statistics, which have been anonymous or aggregated in a manner that does not identify you as an individual.
- To conduct research for analytical purposes including but not limited to data mining and analysis of your transactions with us.
- To meet the disclosure requirements of any law binding on Dacxi.
- For audit, compliance and risk management purposes.
- To assess financial and insurance risks.
- To conduct anti-money laundering checks, for crime detection, prevention and prosecution.
- For any other purpose that is required or permitted by any law, or relevant regulatory authorities.

Please be assured that we will ask for your consent before using your personal information for purposes other than those set out in this Privacy Policy and the Terms and Conditions.

Automated processing of your personal information

In some situations, we may use your personal information to help us make automated decisions to further improve our business or provide you marketing that we think is relevant to you. For example, we might segment you based on elements of your profile (age, location, gender, transaction history), your answers to our surveys or your behaviour on our site and personalise our correspondence to you.

Disclosure of your personal information

To comply with legal and regulatory requirements we may be required to disclose information about you and/or your account details to the following third parties:

- Banks, payment service providers and KYC partners
- Organisations and companies that act as our agents, affiliates and/or professional advisors.

- Organisations and companies that assist us in processing or otherwise fulfilling transactions that have been requested.
- Law enforcement, regulatory and government agencies.
- Affiliates who introduce you to Dacxi may receive limited information about your account and transactions

The aforementioned third parties may in some instances be located outside your registered country.

Otherwise, we will treat your personal information as confidential and private and will not disclose your information to anyone outside the Dacxi group.

We may share your personal information in circumstances such as:

- Where you have given permission.
- Where we are required or permitted to do so by law.
- Where required or authorised by any order of court or tribunal with jurisdiction over Dacxi.
- Where we may transfer rights and obligation pursuant to our agreement with you.
- Where we are required to meet our obligations to any relevant regulatory authority.

Transferring your information

Dacxi Limited OÜ is registered and operates in the EU, but we use the services of a number of third parties that are based outside the EU. Accordingly, your personal data may be stored, transferred, and processed in countries outside of the country of your residence.

We take the utmost care when we're transferring your personal data, including ensuring that the third party receiving your personal information has proper safeguards for your information and will only process your personal information in the manner in which we stipulate.

The secure storage of your personal information

Dacxi places the greatest importance on providing strict security measures to protect your personal information. Dacxi will review and implement up to date technical and organisational security measures when processing your personal information. Employees of Dacxi are trained to handle your personal information securely and with the utmost respect, failing which they may be subject to disciplinary action.

The retention of your personal information

Dacxi will retain information in compliance with this Privacy Policy and the Terms and Conditions of your agreement with Dacxi for the duration of your relationship with us, and afterwards for such period as may be necessary to protect the interests of Dacxi and its customers, and as required by Dacxi's relevant policies, and as required by the law.

How you can access and update your personal information

You have a right to access your personal information. Please contact Dacxi customer support to do this. Dacxi will take steps to verify your identity before fulfilling the request.

In the case of changes to your customer data or where it has not been updated, you will need to contact Dacxi support to update your personal information. Dacxi may use its discretion in allowing the corrections requested and/or may require further documentary evidence of the new information to avoid fraud and inaccuracy.

Special provisions related to European Union (EU) data subjects

The European Union General Data Protection Regulation (GDPR) offers data subjects from the EU additional rights when it comes to their personal data. This next section outlines these additional rights, but please note, this additional section for EU data subjects must still be read in conjunction with this Privacy Policy.

Our relationship with you

Dacxi Limited OÜ is a data controller for crypto asset transactions on the Dacxi Order Platform. As data controllers, we determine the purposes and means of processing personal data in respect of crypto asset and crypto account funding transactions.

The legal basis of processing your personal data

We process your personal data on the basis of consent, which you grant to us when you sign up for our service or access the website. We also process your personal data to perform our contractual obligations under the Terms and Conditions. Where we aggregate your personal data to improve our service, we're doing so because of a legitimate interest to provide a better experience for you.

Recipients or third-party processors of your personal data

We use a number of third parties to provide the best possible service to you. This includes:

- Google, which we use for analytics, remarketing and website tracking;
- Facebook, Instagram & LinkedIn which we use to provide remarketing advertisements and special offers that we deem relevant to you;
- Intercom, to offer you personalised live chat support when you use the website. Intercom also helps us send our automated transaction emails, for example, when one of your transactions is confirmed on the Dacxi Exchange.
- Zendesk, which our customer experience teams use for your support requests;

- External KYC provider, the company that verifies your identity; letting you buy and sell crypto assets on the Dacxi Exchange.

Restricting, objecting or withdrawing your consent to the processing of your personal data

You may withdraw your consent for us to process your personal data at any time. You may also request that we restrict the way we process your personal data. You can do this by contacting us using the details at the bottom of this Privacy Policy.

How long we keep your personal data

We will store your personal data for as long as you have a relationship with us, or for as long as we are required to by law, or to comply with audit and financial obligations.

Your rights under the GDPR

You have a number of rights under the GDPR. These include the right to:

- request access to your personal data from us;
- request that we rectify your personal data;
- withdraw your consent for us to use your personal data;
- be forgotten by requesting that we delete the personal data that we hold for you;
- object to the use of your personal data by us and request that we restrict our use of your personal data;
- receive your personal data that we hold, in a commonly used electronic format, or to have us transfer such personal data to another service provider of your choosing;
- lodge a complaint in relation to our processing of your personal data with a data protection supervisory authority under the GDPR; and
- learn about and understand how we collect and use your personal data, including we may need to process your personal data in ways other than described in this Privacy Policy.

Changes to this Privacy Policy

This privacy policy may be revised from time to time. If there are any material changes, Dacxi will notify you by email or by the posting of a notice on the website.

Contacting us about your information or this Privacy Policy

If you have any questions, complaints or requests in relation to this Privacy Policy or how Dacxi handles your personal information, please contact us at hello@dacxi.com and state “Data Protection” in the subject line.