

## Privacy Policy

This Privacy Policy describes the general principles on how CoinJump that is operated by Cleobase OÜ (registry code 14715079) address Roosikrantsi tn 2-1277, 10119, Tallinn, Estonia (hereinafter “CoinJump”) processes Users’ Personal Data and is applicable to any person who uses, has used or has expressed intent to use the Services of CoinJump. CoinJump is responsible for Processing your Personal Data. All of the definitions used in and all circumstances not covered by this Privacy Policy shall be regulated by the Terms of Service of CoinJump and/or Regulation (EU) 2016/679.

Please read this Privacy Policy before using the Website and/or Services or submitting your Personal Data.

### 1. Definitions

Here you can find the meanings of the most important terms in this Privacy Policy to help you understand who and for what CoinJump is Processing your Personal Data.

- **Agreement** - service agreement concluded with the client.
- **Cookie(s)** - small pieces of information stored by the Visitor’s browser on the hard disk of the computer of any other device of the Visitor.
- **Data Subject / you** - natural person about whom we have got information or data enabling to identify the natural person. Data Subjects are our client’s representatives, Users and Visitors. CoinJump does not knowingly collect or maintain personally identifiable information on the Website or through its Services from persons under 16 years of age, except if a guardian of such child has consented to the Processing.
- **GDPR** - Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- **Personal Data** - means any information which CoinJump directly relates to you (a legal or natural person or an organization legally engaged in business activities or any other business). In particular by reference to an identifier such as a name, date of birth, contact information, location data, an online identifier etc. Processing may be done manually or using automated systems.
- **Privacy Policy** - this privacy policy.
- **Process** or **Processing** - means any operation or set of operations which is performed by CoinJump as part of the Services on Personal Data or on sets of Personal Data, whether or not by automated means.
- **Processor** and **Controller** - shall have the meanings given in the GDPR.

- **Visitor / User** - is any person using the Services of CoinJump.
- **Website** - <https://coinjump.io/en> and all domains that CoinJump may choose to use for delivering its services.

## 2. The content of Personal Data CoinJump Processes

By agreeing to this Agreement or using the Services and the Website, you agree that the CoinJump will use, disclose and Process your Personal Data in accordance with this Privacy Policy:

- 2.1. CoinJump Terms of Service and present Privacy Policy applies to communication between you and CoinJump (incl. emails, phone calls, etc.) and to your use of the Website and Services and establishes the policy on which Personal Data will be Processed by CoinJump.
- 2.2. CoinJump may Process any information submitted, shared or exchanged to provide the Services. CoinJump collects information by email, phone calls or by questionnaire or any other means. Some information may also be collected via automatic means e.g. Website telemetry/analytics. CoinJump may also collect information from third parties e.g. verification services. CoinJump shall do all that is reasonably possible to ensure the confidentiality of the Personal Data that CoinJump has collected.
- 2.3. CoinJump Processes Personal Data only if it has your consent to do so, or if it is necessary for providing you the Services, or CoinJump has the legitimate interest to do so, or if it is required by applicable legislation.
- 2.4. CoinJump mainly Processes data to comply with applicable laws, regulations and instructions, to manage the relationship between CoinJump and you, to provide additional Services, to prevent illegal activities and misuse of the Service and Website, to ensure the quality of the Service and Website or app, etc.
- 2.5. You are required to provide your real name, address, nationality, telephone number, e-mail address, as well as other information as required by applicable laws and regulations. You can also choose to fill in additional information. By providing the previously mentioned information you understand and agree to that CoinJump will access your Personal Data (including but not limited to mobile phones, electronic mail, etc.) to send you relevant notices and other commercial electronic information to provide you with new Services and opportunities. CoinJump will not share your Personal Data without your previous consent unless legally obliged to.
- 2.6. CoinJump collects some of the information automatically. Information that is collected automatically is used with the sole purpose of improving the user experience and detecting

problems of the website or app. CoinJump may collect only information that does not constitute identifiable personal data (incl. truncated IP address, operating system, language settings, subscriptions, and other information about the interaction of you and the Website). CoinJump will not collect any information that constitutes personal information (incl. Name, Last names, full IP address, Public key or location). CoinJump may use authorized Processors and Services provided by third parties to collect and Process Data.

- 2.7. In order to ensure the safety of your use of the Services and the Website and to continuously improve the quality of service, CoinJump will record and keep information about your login and use of the Service and the Website, but CoinJump undertakes not to provide such information to any third party (unless otherwise agreed upon by both parties, or other laws and regulations).
- 2.8. CoinJump will keep tight security of all the complete comprehensive statistics regarding identity data of CoinJump Visitors and will not use and/or disclose them for sale and reward. CoinJump reserves the right to transmit the Personal Data to law enforcement institutions, state authorities and financial institutions if it should be required to comply with valid laws.

### **3. Disclosure and transfer of Personal Data**

CoinJump only Processes your Personal Data on your consent, if there is a legitimate interest in Process Data or if it is required by valid legislation. In order to provide you with a more efficient service, you agree that CoinJump shall have the right to provide your registered information which you have furnished to CoinJump in the course of your registration and use of the Service. At the same time, CoinJump reserves the right to require you to submit identity information (including but not limited to identity card, bank account book, passports, and other certificates or other documents). Except as otherwise provided in Terms of Service or present Privacy Policy, CoinJump does not disclose or provide your information to third parties except in the following cases:

- 3.1. with your explicit authorization;
- 3.2. only to disclose your Personal Data in order to provide you with required products and/or Services;
- 3.3. disclosure in accordance with the requirements of this Privacy Policy;
- 3.4. according to the provisions of applicable laws and regulations;
- 3.5. in accordance with the instruction and requirements of applicable laws and Authorities etc;
- 3.6. for the maintenance of CoinJump legitimate rights and interests;
- 3.7. to verify the authenticity of the identity of you or your representative company.

#### **4. Retention of Personal Data**

- 4.1. CoinJump shall store your Personal Data for as long as required by law or in accordance with the law, or for the purposes stated in this Privacy Policy. Your Personal Data will be Processed no longer than necessary. The retention period of your Personal Data may be based on the applicable law (e.g. Money Laundering and Terrorist Financing Prevention Act, etc.) or legitimate interest of CoinJump or Agreements signed between you and CoinJump.
- 4.2. The data shall be retained in personal form for the duration of the business relationship and once terminated, during the term applicable by law or regulations to which CoinJump is subject to the retention of the specific data.
- 4.3. CoinJump does not sell or rent Visitor's data to third parties. CoinJump collects data so that you could use the Services.
- 4.4. Using forms and other means, Visitors can send data to register themselves to external organizations that use the Website as a participation platform. Please be aware that CoinJump has no control over the content you share with these third-parties entities, and cannot accept responsibility or liability for their respective privacy policies.
- 4.5. The Personal Data collected by CoinJump is not transmitted to countries outside the European Union or to countries that lack Personal Data protection legislation in compliance with the standards of the European Union. Data is stored in servers located in a European Union member state.
- 4.6. You reserve the right to demand access, correction and deletion of the data collected with your consent at all times.
- 4.7. After the expiration of the Personal Data storage period, CoinJump shall anonymize or permanently erase your Personal Data.

#### **5. Data Subject's rights in relation to Personal Data**

- 5.1. If you wish to exercise any of your rights regarding Personal Data or ask questions about the Privacy Policy, please submit a corresponding request to us at [support@coinjump.io](mailto:support@coinjump.io). We will respond to your request by email as a rule no later than within one month. Please note that before we can provide you with the requested information regarding your Personal Data, we need to verify your identity.
- 5.2. You as a Data Subject have the following rights in relation to Personal Data:

- **Right of access to Personal Data** - you have the right to know which of your Personal Data we store and how we Process it, including the right to know the purpose of the Processing, the persons to whom we will disclose your Personal Data, information about automated decision-making and the right to receive copies of Personal Data.
- **Right to rectification of Personal Data** - you have the right to request the rectification of inadequate, incomplete and misleading Personal Data.
- **Right to withdraw the consent given for the Processing of Personal Data** - you have the right at any time to withdraw the consent given to us for the Processing of Personal Data. Please note that withdrawal of your consent shall not affect the legality of the Processing that was made on the basis of consent before the withdrawal.
- **Right to erasure of Personal Data („right to be forgotten“)** - you have the right to request that we erase your Personal Data (for example, if you take back the consent for the Processing of Personal Data, or if Personal Data is no longer needed for the purpose for which it was collected). We have the right to refuse the erasure of Personal Data if the Processing of Personal Data is necessary for the fulfilment of our legal obligation, to exercise the right to freedom of expression and information, for the preparation, presentation and protection of legal claims, or in the public interest.
- **Right to restriction of Processing** - In certain cases, you have the right to prohibit or restrict Processing of your Personal Data for a certain period of time (e.g., if you have filed an objection to Personal Data Processing).
- **Right to object** - you have the right to file an objection to Processing of your Personal Data if your Personal Data Processing takes place on the basis of our legitimate interest or public interest. You shall have the right to object at any time to Processing of Personal Data for direct marketing purposes, and we shall respond immediately.
- **Right to data portability** - In case your Personal Data Processing is based on your consent and Personal Data is processed automatically, you shall be entitled to receive Personal Data about you that you submitted to us as the controller, in a structured, commonly used and machine-readable format, and you shall have the right to transmit this Personal Data to another controller. You also have the right to request that we transfer Personal Data directly to another controller, where technically feasible.
- **Automated decision-making (including profiling)** - provided that we have informed You that we perform automated decision-making (including profiling) that will bring about legal consequences

for you or have a significant effect on you, then you may require human intervention in the decision-making process.

- **Submission of complaint** - In case you find that your rights have been breached, you have the right to seek protection and file a complaint to the Data Protection Inspectorate.

Please read more about your rights from chapter 3 of the GDPR.

## 6. Security of Personal Data

6.1. Security is of utmost importance to us. We do our best to protect Personal Data in our hands.

6.2. We apply various measures (physical, technical, organizational) to protect your Personal Data from unauthorized or arbitrary rectification, disclosure, acquisition, destruction, loss or unauthorized access.

6.3. If you have any information about an actual or suspected data breach, please inform us immediately at [support@coinjump.io](mailto:support@coinjump.io). We will deal with the issue immediately and inform the Data Protection Inspectorate (if applicable).

## 7. Cookies

7.1. Cookies are small text files placed on your device when you visit a Website. We use Cookies on our Website, that you can accept if you choose to use our Website. CoinJump places on your device only a session-ID cookie. The cookie is used to ensure that the source of a request to a server is the same as the one through which log-in occurred. Cookies allow us to recognize whether you have used the Service before, and it helps us to store your preferences and other information.

7.2. Most of the web browsers allow Cookies. Without fully allowing Cookies, not all of the functions of the Website are available to a Visitor. The allowing or prohibiting Cookies and other similar technologies shall be under the control of a Visitor via the settings of the Visitor's own web browser. Most browsers allow you to control cookies, including turn off their acceptance by your device, through their settings' preferences. However, if you turn off the ability of your device to accept cookies, you may lose access to this Website and the services provided via it.

7.3. If you prefer that your Personal Data will not be Processed on our Website, you can activate the private browsing feature of your web browser.

7.4. If you access this Website without changing your browser settings, CoinJump will assume that you agree to receive the cookies which CoinJump or third parties place into your device when you use this Website.

## **8. Device permissions**

8.1. For a better experience, while using our Website, CoinJump may require you to enable Push notifications and give access to the Camera. This permission will only be used to scan QR codes and no data will be retained by CoinJump.

## **9. Contact**

9.1. CoinJump would like to make sure you are fully aware of all of your data protection rights, based on the GDPR. Every Visitor can exercise their rights to access, modify, deny or restrict the handling and portability of data, as well as, revoke consent at any time given.

9.2. If you have any questions or comments about this Privacy Policy, or if you would like to review, delete or update information about you or your preferences, please contact CoinJump at the following address: [support@coinjump.io](mailto:support@coinjump.io)

## **10. Changes to this Privacy Policy**

10.1. Kindly note that CoinJump may modify the Privacy Policy from time to time. Please periodically visit this section to review for any changes. The modified policy will be uploaded to Webpage.

10.2. CoinJump will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page.