

THIS PRIVACY POLICY WAS LAST UPDATED ON 7TH OF MAY, 2019.

THIS PRIVACY POLICY IS INCORPORATED AND MADE A PART OF CINDX TERMS OF SERVICE (WWW.CINDX.IO). CINDX INVESTKAPITAL AS, A COMPANY INCORPORATED IN ESTONIA, REGISTRY NUMBER 14427370 AT HARJU MAAKOND, TALLINN, ERIKA STR 14-208, HAS CREATED THIS PRIVACY STATEMENT IN ORDER TO DISCLOSE OUR INFORMATION GATHERING AND DISSEMINATION PRACTICES FOR CINDX.IO WEBSITE. PLEASE READ THIS DOCUMENT CAREFULLY.

IT CONTAINS IMPORTANT INFORMATION THAT YOU SHOULD KNOW BEFORE CONTINUING TO USE OUR WEBSITE OR SERVICES (AS SUCH TERM DEFINED IN THE TERMS OF SERVICES). BY CONTINUING TO USE CINDX.IO WEBSITE AND SERVICES YOU WILL BE DEEMED TO HAVE ACCEPTED THIS PRIVACY POLICY.

INTRODUCTION

1.Compliance

This Privacy Policy (hereinafter referred to as the 'Policy') sets forth the general rules of collection, processing, distribution, use and storage of Website user's Personal data including any dispute concerning privacy under current General Data Protection Regulation (GDPR), and in accordance with the data protection regulations in Estonia applicable to the Cindx Investkapital AS, a company incorporated in Estonia, registry number 14427370 at Harju Maakond, Tallinn, Erika str 14-208 (hereinafter the 'Cindx', 'Company', 'Us', 'We').

2. Use of website

It is understood and presumed that by the fact of use of the Website and its services or by clicking 'I AGREE WITH WITH THE TERMS OF USE AND PRIVACY POLICY' button the User gives Consent, that he/she/it has fully read, understood and accepted this Policy. If any User does not agree with this Policy in general or any part of it, such User should withhold from using the Website and its services.

3. Definitions

The following definitions and rules of interpretation apply in this Privacy policy:

Personal data

Personal data means any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is an individual that can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, address or other identification data.

Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Estonian legislation.

Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Third party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Website

A website owned and operated by Cindx Investkapital AS, available in the Internet via address: www.cindx.io

Modifications

This Privacy Policy may be modified, changed, supplemented, updated at any time with prior written notice from Cindx Investkapital AS. Your continued use of the Website and its services after any amendments or alterations of this Privacy Policy without notification of Cindx Investkapital AS shall constitute your consent hereto and acceptance hereof of an updated version of this Privacy Policy. At any case, the date of the most recent amendments and alterations will be indicated at the top of this webpage. If the User does not agree to such revised terms of the Privacy Policy or Terms of Use he/she/it must stop using this Website and his account and may withdraw from his/her/its obligations under this Privacy Policy.

4. Legal basis for the processing of personal data

Cindx Investkapital AS may process the following personal data obtained through the use of means that are covered in this Policy:

5. Personal details

Name, username; password, date of birth, age, preferred language(s). Contact details

Address; telephone number (including mobile phone number); e-mail address, any other information provided when filling out a contact form.

6. Consent records

Records of any consents given, together with any related information.

7. Online details

Information that is obtained through the use of website, and may or may not constitute personal data, depending on the circumstances and applicable laws: non-precise information about the approximate physical location, Internet Protocol address, information collected through the use of cookies, Javascript, other technologies, log files and similar information.

Cindx will not process following personal data that may be deemed sensitive: race or ethnicity, political views, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life and sexuality, any actual or alleged criminal offences or penalties, or any other information that may be deemed to be sensitive under GDPR in the ordinary course of our business.

Cindx will not process personal data of minors. Our services, website and marketing materials are not intended for use by children, especially those under 13 years old. They may not be used by individuals under 18 years old.

How is the information used?

We use this information to understand your needs and provide you with a better service, and in particular for the following reasons: To supply you services purchased via the website, and to process your payments.

For statistical purposes and analysis for management purposes in order to administer the website or improve our products and services. Internal record keeping, and administrative purposes, and to inform you about our events, services or products, or other related information that we think would be of interest to you, as explained above.

To communicate marketing messages, newsletters and details of our business or the businesses of carefully-selected third parties which we think may be of interest to you by post or email or similar technology (you can inform us at any time if you no longer require marketing communications).

From time to time, we may also use your information to contact you for market research purposes or to customize the website according to your interests.

Your information will not be disclosed to any third party unless you have given your consent to such disclosure. You may at any time ask us to refrain from sending you marketing messages by sending us an email with the words UNSUBSCRIBE in the subject box by email support@noreply.cindx.io. If we contact you by email each time you receive a message you will also have the option to decline to receive further information of that type from us.

If you would like us to destroy information we hold about you, please let us know. However, please note that if you use any of our services which require you to provide personal information, deleting our records may mean that you will need to resubmit it to continue using such services.

We may disclose aggregate statistics about our site visitors, clients and sales in order to describe our services to prospective partners, advertisers and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifying information. Personal data provided via Subscription form and KYC procedure will be collected in the full compliance with GDPR

The Data Protection Officer of the project is Mrs. Sofja Pevzner-Belositski. Contact details: dpo@cindx.io. Any data subject may, at any time, contact Data Protection Officer directly with any request related to data protection.

Your personal data provided via Subscription form and KYC procedure will be shared to our partners:

Sum & Substance

Registration No 09688671

Contacts: Suite 1, Percy street, Fitzrovia, London, England, W1T 1DG

E-mail: js@sumsub.com

LEGAL REQUISITES

Security

We take precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline.

Wherever we collect sensitive information (such as credit card data), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for 'https' at the beginning of the address of the Web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

Cookies

We use 'cookies' on this site. A cookie is a piece of data stored on a site visitor's hard drive to help us improve your access to our site and identify repeat visitors to our site. For instance, when we use a cookie to identify you, you would not have to log in a password more than once, thereby saving time while on our site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our site. Usage of a cookie is in no way linked to any personally identifiable information on our site.

Social Media

If you share our content through social media, for example by liking us on Facebook, following or tweeting about us on Twitter, those social networks will record that you have done so and may set a cookie for this purpose.

In some cases, where a page on our website includes content from a social network, such as a Twitter feed, or Facebook comments box, those services may set a cookie even where you do not click a button. As is the case for all cookies, we cannot access those set by social networks, just as those social networks cannot access cookies we set ourselves.

Log Files

Our systems automatically gather some anonymous information about visitors, including IP addresses, browser type, language, and the times and dates of webpage visits. The data collected does not include personally identifiable information and is used, as described above, for statistical analysis, to understand user behaviour, and to administer the site.

Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). The information generated by the cookie about your use of our website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. Further information about Google's privacy policy may be obtained from <http://www.google.com/privacy.html>.

If other organizations use cookies or other devices that track site visitors to your site, insert a paragraph like this in your privacy notice: Some of our business partners may use cookies on our site (for example, advertisers). However, we have no access to or control over these cookies. Information collected by registration on the website

Changes

We may make changes to this privacy policy from time to time. If we change our privacy policy we will post the changes on this page. If the change in our privacy policy affects the use of your personal information we will use our best endeavours to contact you by email to seek your consent to the use. Continued use of the service will signify that you agree to any such changes

Your acceptance of this privacy policy

If you do not agree to this privacy policy, please do not use our site. By using our site, you consent to the collection and use of information by us.

Owing to the global nature of the internet infrastructure, the information you provide may be transferred in transit to countries outside the European Economic Area that do not have similar protections in place regarding your data and its use as set out in this policy.

However, we have taken the steps outlined above to try to improve the security of your information. By submitting your information you consent to these transfers.