



INTRODUCTION

Our company Digitaltrade Ltd (**Company, We, Us**) respects and values your (**User, You**) privacy and does all possible to ensure the safety of Your Personal Data (*as defined below*).

In this Privacy Policy (**Policy**) We provide information on the extent of the Personal Data collected, explain to You the reasons for its collection and way We use it, as well as identify third parties with whom Your data is shared.

This Policy forms part of the Polyx Exchange Terms of Use. Please carefully study this Policy and contact Us in case You have any unclarified points or misunderstanding.

DEFINITIONS

In case any of the words used in the text of the Policy starts from the capital letter it shall be understood and interpreted in the way foreseen by the present section of the Terms.

Polyx	The Company's range of products under the Polyx brand.
Polyx Exchange or Exchange	A set of information, web forms, software and hardware and intellectual property objects (including computer software, database, graphic interface design, content, etc.) that belong to the Company, can be accessed from various User devices connected to the Internet through special web browsing software (browser) at “ polyx.net ” domain, including domains of the following levels, to get access to the Services.
We, Us, Our and Company	The Digitaltrade Ltd, a company incorporated under the laws of Saint Vincent and the Grenadines, business company number: 26561 BC 2021, email: info@polyx.net
You, User	Individuals and legal entities that conform to the eligibility requirements foreseen by present Terms, have a registered Account, use Exchange and Services.
Personal Data	generally, means any information that relates to an identified or identifiable living individual that Users provide Us during Account registration, information which is collected about You automatically by Polyx Exchange, information You shared with Us per KYC/AML Verification and communication purposes, as well as information that We obtain from third parties.
Personal Data Processing	means a wide range of operations performed on Personal Data, including by manual or automated means the 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 of Personal Data.

Where this document implements any terms that have not been defined above or under the remaining part of the document, such terms need to be understood in the way they are interpreted in the Polyx Exchange Terms of Use or Terms and Conditions of Polyx Token Sale, its Annexures, applicable laws, and regulations and only as a last resort according to the common practice.

ACCEPTANCE OF THIS POLICY

Where You agree to all and any of the Policy provisions You can accept it by placing next to the box “/ have read and accept the terms of the Polyx Exchange Privacy Policy” during Your Account registration within Polyx Exchange.

In case You at any point do not agree with any provision of this Policy, You shall immediately stop using the Exchange.

What Personal Data Do We Collect?

To enable Your access to Exchange and the Services, We will ask You to provide Us with some important information about Yourself.

During Your use of the Polyx Exchange and Services We may collect the following types of Personal Data:

No.	Type	Personal Data
1.	Communication Data	<input type="checkbox"/> Your email address; <input type="checkbox"/> Other contact details that You use to contact Us.
2.	Registration Data	Where You use Polyx Exchange personally: <input type="checkbox"/> Your full name and surname; <input type="checkbox"/> Your email address; <input type="checkbox"/> Your birthday date; <input type="checkbox"/> Your country of residence. Where You use Polyx Exchange in the name of a legal entity: <input type="checkbox"/> Full name of the legal entity; <input type="checkbox"/> Registration number of the legal entity; <input type="checkbox"/> Date of incorporation/registration of the legal entity; <input type="checkbox"/> Country of incorporation/registration of the legal entity; <input type="checkbox"/> Lists of directors (as applicable) of the legal entity.
3.	Automatically Collected Data	Technical information: <input type="checkbox"/> The internet protocol (IP) address; <input type="checkbox"/> Browser type and version; <input type="checkbox"/> Time zone setting; <input type="checkbox"/> Browser plug-in types and versions; <input type="checkbox"/> Operating system and platform. Usage Data: <input type="checkbox"/> Uniform Resource Locators (URL) clickstream to, through and from polyx.net (including date and time); <input type="checkbox"/> Products User viewed or searched for; <input type="checkbox"/> Page response times; <input type="checkbox"/> Download errors; <input type="checkbox"/> Time of visits to certain pages; <input type="checkbox"/> Click-stream data; <input type="checkbox"/> Methods used to browse away from the page;

		<input type="checkbox"/> other data collected via cookies and similar technologies. <i>Please read Polyx Exchange Cookie Policy for more information.</i>
4.	Enhanced Verification Data	Provided by You manually under Our request where You fall under the conditions of ongoing monitoring: <ul style="list-style-type: none"> <input type="checkbox"/> Government issued identity documents such as Passport; <input type="checkbox"/> National Identity Card; <input type="checkbox"/> Driver's License; <input type="checkbox"/> Utility bill; <input type="checkbox"/> any other information necessary to comply with legal obligations under financial or anti-money laundering laws.

We are constantly developing Polyx Exchange and may add new features and Services, to get access to which You may be asked to provide Us additional information.

You provide Us with any Personal Data on a voluntary basis. However, where You elect not to share with Us Your Personal Data, We may not be able to serve You as effectively and(or) alible Your access to the Polyx Exchange and Services.

What are the Purposes to Collect Personal Data?

We collect the aforementioned Personal Data for the following purposes:

No.	Personal Data	Collection Purpose
1.	Communication Data	<input type="checkbox"/> To provide You with relevant feedback; <input type="checkbox"/> To contact You for administrative reasons, provide You information on Our other services; <input type="checkbox"/> To notify You of other products and services that the User may be interested in.
2.	Registration Data	<input type="checkbox"/> To provide access to the Polyx Exchange and Services; <input type="checkbox"/> To ensure network and information security; <input type="checkbox"/> To provide Service communications.
3.	Automatically Collected Data	<input type="checkbox"/> To ensure network and information security; <input type="checkbox"/> To ensure normal functioning of the Polyx; <input type="checkbox"/> To enhance Your Polyx Exchange experience; <input type="checkbox"/> To indicate the errors and weak points of the Polyx Exchange and develop it; <input type="checkbox"/> To identify the High Value Transaction as well as other cases of enhanced AML/KYC Verification;
4.	Enhanced Verification Data	<input type="checkbox"/> To conduct enhanced AML/KYC Verification and ensure safety of the Polyx Exchange.

We will only use Your Personal Data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose, or we are obliged to process Your data by applicable laws or court/enforceable orders. Where we need to use Your Personal Data for an unrelated purpose, we will notify You and We will explain the legal basis which allows us to do so.

Please note, upon receiving Your consent, We may provide You with promotional messages and other information related to the Polyx and Services.

By placing next to the box “I agree to subscribe to promotional messages and other information related to the Polyx Service”, You consent that We may send all such materials and information to Your email.

At any moment You can cancel Your consent by clicking on the link “*Unsubscribe from the promotional materials*” at the bottom of the relevant email and conducting the actions according to the instructions provided in the email.

How Do We Collect Your Personal Data?

We may collect Personal Data from Users in a variety of following ways:

No.	Personal Data	Collection Way
1.	Communication Data	We get access to such Personal Data when You reach Us for any questions before Your Account registration to get customer service or for any other purposes (e.g., by email).
2.	Registration Data	You provide Us with this Personal Data, when You fill in and submit relevant application forms and complete the required steps to register an Account in Polyx Exchange.
3.	Automatically Collected Data	When You interact with Polyx Exchange, We may collect this Personal data by using cookies, server logs and other similar technologies. <i>Please read Polyx Exchange Cookie Policy for more information.</i>
4.	Enhanced Verification Data	We receive such Personal Data directly from You, as well as obtain it from other sources based on the Personal Data we have.

How Long Do We Keep Your Personal Data?

We will keep Your Personal Data for no longer than it is necessary for that purpose or its collection.

Generally, We will retain and delete Your Personal Data as follows:

No.	Personal Data	Retention Period
1.	Communication Data	We keep it until the moment We provided You with feedback.
2.	Registration Data	We keep it strictly throughout the life of Your Account and delete it once Polyx Exchange executes the request to close Your Account. Where required by applicable law, Personal Data may be retained after the Account is closed within the period prescribed by such laws.
3.	Automatically Collected Data	We keep it strictly throughout the life of Your Account and delete it once Polyx Exchange executes the request to close Your Account. Where required by applicable law, Personal Data may be retained after the Account is closed within the period prescribed by such laws.
4.	Enhanced Verification Data	We keep it strictly throughout the life of Your Account and delete it once Polyx Exchange executes the request to close Your Account.

Please note, that We can keep Your Personal Data for a longer period where it is required by the relevant laws and regulations. Polyx retains some of the Personal Data after the closure of Your Account in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply

by closing their account and opening a new account, and to comply with Our legal obligations.

What is the Legal Basis for Processing Personal Data?

The processing of Personal Data is performed in accordance with privacy rights and regulations following the EU General Data Protection Regulation (**GDPR**) and our local regulations.

Where regulations of the country of Your locations provide for stricter Personal Data standards, the processing of Your Personal Data will be effectuated in accordance with these standards.

Generally, the legal grounds for the Personal Data Processing could be listed as follows:

Your Consent. Insofar as You have granted Us consent to the processing of Personal Data for specific purposes, the lawfulness of such processing is based on Your consent. Giving Us Your consent to the processing of Your Personal Data is voluntary. Any consent granted may be revoked at any time. Please be advised that the revocation shall only have effect for the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

Agreement Performance. It means processing Your data where it is necessary for the performance of an agreement to which You are a party or to take steps at Your request before concluding an agreement. This includes Polyx Exchange Terms of Use and Terms and Conditions of Polyx Token Sale.

Our Legitimate Interest. It means Our interest to conduct and manage Our business affairs appropriately and responsibly, to protect the reputation of our business, and to provide You with the best possible Services and secure experience.

Legal Compliance. We process Your Personal Data where it is necessary for compliance with a legal or regulatory obligation.

Do We Transfer or Share Your Personal Data To (With) Others?

We sometimes need to share Personal Data We process with third parties. Please find below the list of the limited third parties with whom We may share Your Personal Data:

1. Business partners, suppliers, and sub-contractors in order to provide You the Services.

We require all affiliated entities to respect the security of Your Personal Data and to treat it in accordance with the law. We do not allow them to use Your Personal Data for their own purposes and only permit them to process Your Personal Data for specified purposes and in accordance with our documented instructions.

Please note, Third-Party Service Providers do not fall under the criteria of affiliated entities. We do not share Your Personal Data with them.

2. Courts and(or) government authorities and(or) law enforcement officials in cases where it is required by the laws and regulations.

We will only use and share Your Personal Data where it is necessary for Us to lawfully carry out our business activities.

3. Analytics and search engine providers that assist the Company in the improvement and optimization of Polyx Exchange.

We can guarantee You, that We will not sell, exchange, or share with any third parties Your Personal Data without Your express consent.

Do We Transfer Your Personal Data Overseas?

However, in order to facilitate our global operations, Our Company may use the services of overseas data processing service providers, unless Your jurisdiction laws and regulations limit such data transfer.

We hereby warrant You that We will only transfer Your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal data by the European Commission. We will make all possible efforts to ensure protection of Your Personal Data in accordance with this Privacy Policy wherever Your Personal Data is processed and will take appropriate contractual or other steps to protect the relevant Personal Data in accordance with applicable laws.

Where such service providers are not established in a country ensuring an adequate level of protection within the meaning of Regulation (EU) 2016/679, such as the United States, the transfers will be covered by the standard data protection clauses adopted by the European Commission or by another appropriate safeguard mechanism such as the Privacy Shield Framework.

How We Secure Your Personal Data?

We have implemented several technical, organizational, and administrative measures to ensure the confidentiality, integrity, availability, and privacy of Your Personal Data and to protect Your Personal Data from loss, theft, unauthorized access, misuse, alteration, or destruction which are generally accepted by the industry to protect the Personal Data in its possession.

These measures include but are not limited to the implementation of current security technologies: Secure Sockets Layered (SSL) technology to ensure that Your Personal Data is fully encrypted and sent across the Internet securely, secure coding principles, and regular penetration testing.

We also use encryption (HTTPS/TLS) to protect data transmitted to and from Polyx Exchange. Transport Layer Security (TLS) is a protocol that provides privacy and data integrity between two communicating applications. It's the most widely deployed security protocol used today and is used for Web browsers and other applications that require data to be securely exchanged over a network, such as file transfers, VPN connections, instant messaging, and voice over IP.

Only authorized Company personnel have access to the Personal Data, and these personnel are required to treat the Personal Data as confidential. The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

Your Rights

Your principal rights as the Personal Data subject include the following:

1. **Right to access Personal Data.** You may request Us to provide You a copy of Your Personal Data that we have access to. We will provide You with such information within a reasonable period and may require You to compensate for the expenses associated with gathering the information.
2. **Right to Personal Data rectification.** You may request Us to rectify or update any of Your Personal Data. You can do this with the use of relevant Polyx Exchange functionality or by contacting us directly. The Company reserves the right to reject personal assistance where rectification of Personal Data is available through the Polyx Exchange functionality.
3. **Right to Personal Data deletion.** You may request Us to erase Your Personal Data, subject to applicable law. Please note, that in some cases Polyx Exchange will automatically delete Your Personal Data when You close Your Account. However, if You close Your Account, We will not use Your Personal Data for any further purposes, nor share it with third parties, except as required by

the law. Please note, 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.

4. **Right to withdraw consent.** To the extent the processing of Your Personal Data is based only on Your consent, You may withdraw Your consent at any time. This will not affect the lawfulness of any processing which was carried out before the withdrawal. Please note, any processing activities that are not based on Your consent will remain unaffected.
5. **Right to restrict processing.** In some jurisdictions, applicable law may give You the right to restrict or object to Us processing or transferring Your Personal Data under certain circumstances. We may continue to process Your Personal Data if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.

Kindly note that none of the rights is absolute, meaning that they must generally be weighed against Our own legal obligations and legitimate interests. If a decision is taken to override Your request, You will be informed of this by Us along with the reasons for our decision.

LINKS TO OTHER WEBSITES

Polyx may contain links to external websites/platforms maintained by Third-Party Service Providers, whose Personal Data and privacy practices are different from Ours.

The Company is not responsible or liable for the Personal Data or privacy practices employed by such third parties. We strongly recommend You read the privacy statements of all third-party websites before using such websites or submitting any Personal Data or any other information on or through such websites.

POLICY AMENDMENT

This Policy may be revised, updated and(or) amended at any time without prior notice at the Company's discretion. If such amendments are made, the date when this Policy was updated will be displayed on the first page of the Policy.

You undertake at Your own risk to keep yourself updated with the Policy amendments. We strongly recommend You do the following: (i) memorize/make a note of the date of last update provided in the document (e.g., to save its copy) upon the initial registration of Account and any time upon amendment of the Policy, (ii) visit on a regular basis the relevant page of the Exchange website and study the entire Policy in case of change in the update date.

By using Polyx Exchange, You automatically confirm their consent to this Policy in the applicable part. If the User does not agree with this Policy, we strongly recommend that You stop using the Exchange and Our Services.

After posting the updated version of the Policy within the Polyx Exchange, further use of the Polyx is considered as acceptance of the terms of the updated Policy.

CONTACT US

If anything is left unclear in the text of this Policy, we will be happy to clarify its provisions.

You can also use the contact details provided in this section for any reason foreseen by the present Policy.

For questions related to this Policy, please contact us via email info@polyx.net or support@polyx.net.