

DEVEXA PRIVACY POLICY

This Privacy Policy ("Devexa Privacy Policy") applies to all information and data collected, stored and used by Us, Devexperts LLC, a company with its principal corporate office at: First Names House, Victoria Road, Douglas, Isle of Man, IM2 4DF, ("We", "Devexperts"), which is relating to living physical persons ("Data Subjects") from various sources ("Channels"), including Facebook, Telegram, Google Assistant and others, through Devexa.

This Devexa Privacy Policy explains the following:

- The type of information we collect
- How we use that information
- The retention policy of the information we collect
- The mechanisms and tools we offer to you so as to allow you to modify or – under specific circumstances – even delete the information we collect
- How we secure the information we collect

When you subscribe to Devexa you have to accept Devexa Privacy Policy.

If the individual accepts Devexa Privacy Policy on behalf of a company or other legal entity, such individual confirms that he or she has the authority to bind that entity and its affiliates to Devexa Privacy Policy. In this case the terms "You", "User" shall refer to this entity and its affiliates.

If You don't accept Devexa Privacy Policy, unfortunately, We won't be able to communicate with You via Devexa Chatbot and provide any Services to You.

Devexa Privacy Policy is a part of Terms of Service. You may find definitions of all capitalized notions not described in this document in Terms of Service.

WHAT INFORMATION DO WE COLLECT?

Devexa collects and process for its own use Personal Data, including:

When You create an account in one of the various Channels, supported by Devexa, You provide Your Personal Data to this Channel. Some of this information can be shared with Devexa via the Channel API, such as: nickname, first name and last name.

If You use Devexa with multiple Channels, We may collect the information about You from all these Channels.

We may collect all communications conducted by Users via Devexa ("Dialogs") and System logs.

HOW WE USE INFORMATION WE COLLECT FROM YOU

We use this information:

- to personalize and continually improve Your Devexa experience and provide information about market data trends, exchange popularity and financial enquiries;
- to respond to Your demands, requests and inquiries, communicate with You and request feedback on Devexa;
- to notify You about changes to this Policy or Terms of Service;
- to comply with legal and/or regulatory requirements and cooperating with regulators and law enforcement bodies;
- to protect Our rights, Your rights, and the rights of others, and meeting Our own high standards of business practice.

We may use anonymized and aggregated Personal Data and Dialogs for internal analytical and statistical purposes.

HOW DO WE PROTECT YOUR PERSONAL DATA?

We shall:

- process the Personal Data in accordance with applicable legislation and regulations relating to the protection of Personal Data (including the GDPR) ("Data Protection Laws") only for the purposes specified above or as otherwise instructed in writing by You, and inform You if any instruction contradicts any legal requirements to which We are subject;
- keep all Personal Data confidential;
- ensure that access to Personal Data shall only be provided to those of Our employees, affiliates, Services Providers or third party providers who need access to such data for the communication with You and the performance of the Services;
- take adequate technical, organizational and physical security measures to safeguard Personal Data against unauthorized access, destruction, disclosure, transfer, or other improper use, *inter alia* vulnerability scanning, regular Malware Scanning, disaster recovery plan and other business continuity programs implementation;
- provide You at Your written request with reasonable access to the Personal Data about You that We hold for You to be able to review and update Your Personal Data;
- promptly notify You of any accidental or unauthorized access, destruction, disclosure, transfer or other improper use of Your Personal Data, after We become aware of any such access, destruction, disclosure, transfer or other improper use;
- provide You at Your written request with all information necessary to demonstrate that We are in compliance with this clause;
- audit the adequacy of Our security measures used to process Personal Data.

We do not use automated decision-making while proceeding Your Personal Data or any other similar method that has legal or similarly significant effects on the individual.

DATA RETENTION

We retain Personal data for 5 years after the last digitally recorded correspondence We had with You, unless You send Us a written request of revocation of Your consent earlier. After this period, our retention policy dictates that we delete Your Personal Data and from Devexa data storage. Dialogs and Personal Data in an anonymized form have no limitation on retention period.

HOW DO WE SHARE YOUR PERSONAL DATA?

From time to time, to the extent permitted by applicable law, We may share Your information with Our affiliates (the "Affiliates"), third party providers (e.g. credit card processors, data hosters, Channels), Your Services Providers and authorities in the following circumstances:

Affiliates. We may share Your information with Our Affiliates for purposes identified above. To the extent required or permitted by applicable law, by using Devexa or otherwise providing Us with Your information, You consent to this sharing of Your information.

Third party providers. We may share Your information with third parties who perform functions on Our behalf (e.g., hosting or operating our services). We do not authorize these third party providers to use Your information for purposes other than for which it has been provided, and do not authorize these third parties to disclose that information to unauthorized parties.

We require these third parties to maintain appropriate security to protect Your information from unauthorized access or processing.

Authorities. We may disclose Your Personal Data to the regulatory authorities, courts, and government agencies, where We believe that doing so would be in accordance with or permitted or required by any applicable law, regulation or legal process, to defend the interests, rights, and/or property of Us or others, or to respond to emergencies.

Services Provider. We may share Your Personal Data and Dialogs with Your Services Provider in case Devexperts is not Your Services Provider. We share Your Dialogs and Personal Data with them so that such Services Providers may perform necessary Services with respect to You and communicate to You.

We shall transfer Your Personal Data to entities stated above and shall ensure that any such transfers of Personal Data to third parties will be subject to contractual requirements to safeguard Personal Data equivalent to those set out in the section above, and We shall remain liable to You for any breaches caused by third parties and/or Our Affiliate concerning such transfer. However, third party providers and Services Provider have separate and independent privacy policies. We therefore have no responsibility or liability for their activities after We have done Our best to provide safety for Your Personal Data processing.

We do not sell or share Your Personal Data to or with any other third party companies or products except as stated above.

CONSENTS

If You use Devexa as a natural person, You hereby give Your consent to Us to process Your Personal Data and Dialogs. Subject to applicable law, You shall provide any further consent needed for Us, data originators, third party providers, Services Provider or any auditors acting on behalf of the named above, to review, receive and store Personal Data, where necessary for the purposes of ensuring compliance with Your obligations. You also consent the aforementioned entities are entitled to review, receive and store Personal Data, where necessary for the purposes of verifying or ensuring compliance with Your obligations.

If You use Devexa on behalf of a legal entity, You hereby warrant that all Data Subjects (individuals whose Personal Data is at issue) that shall be involved in Services acquirement and Devexa usage from Your side, have consented to their Personal Data being disclosed to Us, data originators, third party service providers, Services Provider or any auditors acting on behalf of the named above for Personal Data processing, including the further potential

transfer to the aforementioned entities, in particular, in accordance with the data originators', third party providers' policies, and the requirements of the regulatory authorities. Such Data Subject's consent shall include the aforementioned entities' right to review, receive and store Personal Data, where necessary for the purposes of verifying or ensuring compliance with Your obligations. In case You are involved in Services redistribution to Data Subjects and such Data Subject revokes his/her consent, You shall promptly inform Us and terminate the Services provision to such Data Subject.

HOW CAN YOU CONTROL YOUR PERSONAL DATA PROCESSING?

Subject to local law, You may have certain rights regarding Your Personal Data. These may include, depending on the circumstances, the following rights to: access Your personal information; rectify the personal information We hold about You; erase Your personal information; restrict Our use of Your Personal Data; object to Our use of Your Personal Data; receive Your Personal Data in a usable electronic format and transmit it to a third party (also known as the right of data portability); lodge a complaint with Your local data protection authority; and withdraw any consent You have given to the use of Your Personal Data. If You would like to discuss or exercise the rights You may have, feel free to contact us via email at privacy@devexperts.com.

In case You wish to opt out from certain disclosure of any of Your Personal Data to a third party or choose to limit purposes for which Your personal information is collected or used by Us, You may do so by contacting us via email at privacy@devexperts.com. However, We feel obliged to warn You that Your setting of certain limitations of Your Personal Data processing by Us may cause Our inability to provide Services and sufficient help to You in its fullest scope.

In case We have anonymized Your Personal Data and Dialogs, We not be able to respond to Your inquiries as We are simply not able to You to such anonymized data. You may exercise Your rights regarding such anonymized information only by providing additional information enabling Your identification.

INTERNATIONAL TRANSFERS

We are an international company. In order to make Devexa available to You or to provide appropriate Services to You, We may send and store your Personal Data outside of the country where You reside or are located, including to countries that may not or do not provide the same level of protection for Your Personal Data. We are committed to protecting the privacy and confidentiality of Personal Data when it is transferred so, in spite of the data protection adequacy level of such countries, We shall only transfer Personal Data to such third party that: (i) has provided satisfactory assurances to Us that it will protect the Personal Data in accordance with this Policy and the applicable data protection legislation; and (ii) has a legal or contractual right to require such transfer.

ARE CHILDREN ALLOWED TO USE DEVEXA?

Devexa is not intended for use by children. However, we comply with applicable legislation, Children's Online Privacy Protection Act (COPPA) in particular, when it comes to the collection of personal information from children under the age of 13 years old to protect children's privacy and safety online.

CHANGES

We reserve the right to change this Devexa Privacy Policy from time to time as a result of changes required by third party providers, governmental authority, law, regulatory rules or valid subpoena, other administrative or legal process or court order. If We change Devexa Privacy Policy, We will notify You of the changes via Devexa by asking for Your new agreement to them. If You do not agree to the new Devexa Privacy Policy, We will be further unable to provide You Devexa and Services.

CONTACTS

If You have any questions with regards to this Devexa Privacy Policy please contact Us at privacy@devexperts.com. Or You may use any other contacts which You may find here <https://devexperts.com/contact-us/>. If You think that there has been a violation of Data Protection Laws, You may address the European Data Protection Authorities.