



## PRIVACY POLICY

09/21/2021

This policy, in accordance with the International Law, defines the policy of PROFIT RAIDERS LLC (hereinafter referred to as the Operator) regarding the processing of personal data and information about the requirements for the protection of personal data implemented by the Operator. This policy applies to all personal data posted or posted using the Information Service that the Operator receives or may receive from the User. This policy is an integral part of the Operator's internal document that defines the Operator's general policy regarding processing personal data and disclosing general information about the requirements implemented by the Operator for the protection of personal data.

### 1. GENERAL PROVISIONS

1.1. The following terms and definitions for the purposes of this policy have the following meanings:

**"Personal data"**- any information relating to a specific or to an individual (subject of personal data) determined on the basis of such information, including his last name, first name, patronymic, year, month, date and place of birth, address, e-mail address, telephone number, family, social, property status, education, profession, income, other information. For the purposes of this policy, under personal data means both information that the User provides about himself when using the Information Service, and information that is automatically transmitted to the Operator in the process of using the Information Service with using the software installed on the User's device, including the IP address, cookie data, information about the User's browser, technical characteristics of the equipment and software used by the User, the date and time of access to the Information Service, the addresses of the requested pages of the website and other similar information. In addition, personal data for the purposes of this policy also includes information about the User, the processing of which is provided for The User Agreement governing the use of the Information

Service.

**"Operator"**– PROFIT RAIDERS LLC, carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

**"User"**– any natural person (subject of personal data), including acting on behalf and in the interests of a legal entity that has expressed agreement with the terms and conditions set forth in the User Agreement by making the implicit conditions specified therein actions aimed at using the Information Service, which may, in the process of using the Information Service, provide the Operator with their personal data.

**"Information Service"**- a software package located on the Internet on the website at: <https://profitraiders.com/>, which is a platform connecting traders and investors to make transactions with cryptocurrency (virtual currency) through specialized exchanges. The Information Service includes, but is not limited to, the totality of information, texts, graphic elements, design, images, photos and videos, and other results of intellectual activity, as well as computer programs contained in the information system that ensures the availability of such information on the Internet at the above address.

**"Terms of use"**– an agreement between the User and the Operator, regulating the procedure for using the Information Service. The specified document is a civil law contract concluded between the User and the Operator at the time of the start of using the Information Service, unless otherwise specified in the agreement itself.

**"Information system of personal data", "Information system" -** the totality of the User's personal data contained in the databases owned by the Operator and the information technologies and technical funds. The personal data information system is an integral part of the information system that manages and supports the Information Service.

**"Processing of personal data"**– actions (operations) with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction.

**"Automated processing of personal data"**– processing of personal data using computer technology.

**"Non-automated processing of personal data", "Processing of personal data without the use of automation tools"**– processing of personal data contained in the personal data information system or extracted from such a system in cases where such actions with personal data as the use, clarification,

distribution, destruction of personal data in relation to each of the subjects of personal data, are carried out with the direct participation of a person.

**"Dissemination of personal data"**– actions aimed at the transfer of personal data to a certain circle of persons (transfer of personal data) or the disclosure of personal data to an indefinite circle of persons. **"Provision of personal data"** - actions aimed at the transfer of personal data to a specific person or a certain circle of people.

**"Blocking personal data"**- temporary suspension of the processing of personal data (except when processing is necessary to clarify personal data).

**"Destruction of personal data"**- actions that make it impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed.

**"Anonymization of personal data"**- actions, as a result of which it is impossible without the use of additional information to determine the ownership of personal data by a particular subject.

**"Use of personal data"**– actions (operations) with personal data, committed for the purpose of making decisions, making transactions or other actions that give rise to legal consequences in relation to the subjects of personal data, or otherwise affecting their rights and freedoms or the rights and freedoms of other persons.

**"Publicly available personal data"**- personal data, access of an unlimited number of persons to which is granted with the consent of the subject or to which, in accordance with Confidentiality is not covered by international law.

**"Privacy of personal data"**- obligatory for observance of the person, who has gained access to personal data, the requirement not to allow their distribution without the consent of the subject or other legal grounds.

**"Cookies"**, **"cookies"** is a small piece of data sent by the web server and stored on the User's device. Cookies contain small pieces of text and are used to store information about how browsers work. They allow you to store and receive identification information and other information on computers (computers), smartphones, phones and other devices. Cookie specifications are described in RFC 2109 and RFC 2965. Other technologies are used for the same purposes, including data stored in browsers or devices, identifiers associated with devices, and more software. All of these technologies are referred to as files in this policy. **"cookies"**.

**"Counter"** - a part of the Information Service (a code fragment, usually in JavaScript), functionally responsible for the analysis of cookies and for collecting personal data about the use of the Information Service. The operator can use the counters as its own development, and provided by third parties on a limited basis

licenses (license agreement), for example, Google Analytics, Yandex.Metrika and other similar counters. Counters collect personal data in an anonymized form.

**"IP address"**– number from the numbering resource of the data transmission network built on the basis of IP protocol (RFC 791), which unambiguously defines when providing telematic communication services, including access to the Internet, a user terminal (computer, smartphone, tablet, other device) or communication means included in the information system and belonging to User.

The terms and definitions used in this policy may be used in either the singular or plural, depending on the context, and the spelling of terms may be capitalized or capitalized.

**1.2.** This policy has been developed in accordance with International Law, "On information, information technologies and information protection".

**1.3.** This policy defines the procedure and conditions for the processing of personal data by the Operator, including the procedure for transferring personal data to third parties, the features of non-automated processing of personal data, the procedure for accessing personal data, the personal data protection system, the procedure for organizing internal control and liability for violations in the processing of personal data, as well as other issues.

**1.4.** This policy comes into force from the moment it is approved by the Operator and is valid indefinitely until it is replaced by a new privacy policy.

**1.5.** The Operator has the right to make changes to this policy without the consent of the User. All changes to the policy are made by an administrative act of the Operator.

**1.6.** This policy applies to all processes for the processing of personal data carried out with the help of the Information Service without the use of automation tools. The Operator does not control and is not responsible for the websites, belonging to third parties, to which the User can click on the links posted in the Information Service.

## **2. PURPOSE OF COLLECTING PERSONAL DATA**

**2.1.** The Operator processes only those personal data that are necessary for the use of the Information Service or the execution of agreements and contracts with User.

When processing personal data, the Operator does not combine databases containing personal data processed for incompatible purposes.

**2.2.** The Operator processes the User's personal data for the following purposes:

**2.2.1.** use of the User's personal data for the operation of the Information Service;

- 2.2.2.** identification of the User when using the Information Service, including when registering the User in the Information Service and creating an account (account);
- 2.2.3.** providing the User with personalized information when using the Information Service, including in the form of news, information about new services, offered by the Operator with the appropriate consent of the User;
- 2.2.4.** communication with the User, including by sending notifications, requests and information regarding the use of the Information Service, the execution of agreements, contracts, transactions with the Operator, as well as the processing of requests from the User;
- 2.2.5.** determining the location of the User to ensure security, fraud prevention, providing the User with information services corresponding to his location;
- 2.2.6.** confirmation of the accuracy and completeness of personal data provided by the User;
- 2.2.7.** improving the quality of the Information Service, the level of ease of use, improving the Information Service, developing new services and proposals for User;
- 2.2.8.** conducting statistical and other studies of the use of the Information Service based on anonymized data;
- 2.2.9.** conducting advertising and marketing mailings with information about other services provided by the Operator. The Parties agreed to consider this clause as the User's prior consent to receive advertising.
- 2.2.10.** Compliance with mandatory requirements in accordance with International Law.

### **3. LEGAL BASIS FOR PROCESSING PERSONAL DATA**

- 3.1.** The Operator processes the User's personal data, guided by normative legal acts of the International protection of rights in the field of activity.
- 3.2.** The processing of the User's personal data is carried out on the basis of and in pursuance of the User Agreement governing the use of the Information Service and other agreements concluded between the User and the Operator using the Information Service.
- 3.3.** The processing of the User's personal data may also be carried out on the basis of his separate consent to such processing, expressed directly when using Information Service by clicking on the appropriate button or by ticking the indicator of the corresponding check-box. The period of validity of such consent of the User is indicated in its text.

#### **4. VOLUME AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS**

**4.1.** Personal data authorized for processing in accordance with this policy and provided by Users by filling in the appropriate input fields when using the Information Service may include the following information:

**4.1.1.** surname, name and patronymic;

**4.1.2.** Date and place of birth;

**4.1.3.** passport data;

**4.1.4.** mailing address;

**4.1.5.** cell phone number;

**4.1.6.** E-mail address;

**4.1.7.** information about the bank card (number, expiration date, name and surname of the cardholder).

**4.2.** Personal data permitted for processing in accordance with this policy and automatically transferred to the Operator in the process of using the Information Service using the software installed on the User's device may include the following information:

**4.2.1.** IP address of the User's device;

**4.2.2.** cookie data;

**4.2.3.** information about the User's browser;

**4.2.4.** technical characteristics of the device and software used by the User;

**4.2.5.** date and time of access to the Information Service;

**4.2.6.** addresses of the requested pages of the website;

**4.2.7.** geographical coordinates of the location of the User.

**4.3.** in accordance with this policy, the Operator processes the personal data of the User belonging to the following categories of personal data subjects:

**4.3.1.** individuals using the Information Service without registration in accordance with the User Agreement;

**4.3.2.** individuals using the Information Service with registration in accordance with the User Agreement.

#### **5. PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL DATA**

**5.1.** The Operator processes the User's personal data without notifying the authorized body for the protection of the rights of personal data subjects in accordance with the International Law in order to protect information.

**5.2.** The Operator processes the User's personal data using

personal data information system without the use of automation tools. In accordance with international law.

Such actions with personal data, such as the use, clarification, distribution, destruction of personal data in relation to the User, are carried out when direct participation of the Operator's employees in accordance with the specifics of the International Law, the Operator processes and stores the User's personal data for a period determined in accordance with the user agreement of the Information Service.

**5.3.** With regard to the User's personal data, their confidentiality is maintained, except in cases where the User voluntarily provides information about himself for general access to an unlimited circle of people. When using the Information Service, the User agrees that a certain part of his personal data becomes publicly available.

**5.4.** The Operator has the right to transfer the User's personal data to third parties in the following cases:

**5.4.1.** there is the consent of the User to such actions, expressed in accordance with the User Agreement of the Information Service;

**5.4.2.** the transfer is necessary for the User to use certain functionality Information Service (for example, for authorization through accounts in social networks) or for the execution of a certain agreement, contract or transaction with the User;

**5.4.3.** the transfer is provided for by International Law;

**5.4.4.** in the event of the transfer of rights to the Information Service, it is necessary to transfer personal data to the acquirer simultaneously with the transfer of all obligations to comply with the terms of this policy in relation to the personal data received by him;

**5.4.5.** if it is necessary to ensure the possibility of protecting the rights and legitimate interests of the Operator or third parties, when the User violates this policy or the User Agreement of the Information Service;

**5.4.6.** in other cases provided for by the International Rules of Law.

**5.5.** In case of loss or unauthorized disclosure of personal data, the Operator informs the User about the specified fact.

**5.6.** The operator takes the necessary organizational and technical measures to protect personal data of the User from unauthorized or accidental access, destruction,

modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

**5.7.** The Operator, together with the User, takes all necessary measures to prevent losses or other negative consequences caused by the loss or unauthorized disclosure of the User's personal data.

**5.8.** The operator has the right to transfer personal data to the bodies of inquiry and investigation, other authorized bodies on the grounds provided for by the current International Rules of Law.

**5.9.** When collecting personal data, the Operator records, systematizes, accumulation, storage, clarification (update, change), extraction of the User's personal data.

**5.10.** The Operator stops processing the User's personal data, the processing of which is carried out with their consent, upon expiration of the User's consent to their processing or upon withdrawal of the User's consent to the processing of his personal data, as well as in the event of unlawful processing of personal data or the liquidation of the Operator.

## **6. HOW PERSONAL DATA IS COLLECTED USING COOKIES AND COUNTERS**

**6.1.** Cookies transmitted from the Operator to the User's device and from the User to the Operator may be used by the Operator to achieve the purposes of processing personal data in accordance with this policy.

**6.2.** The user agrees that his devices and software, used to work with the Services may have the function of prohibiting operations with files "cookies" both for any and for certain sites and applications, as well as the function of deleting previously received cookies (for example, private browser mode).

**6.3.** The Operator has the right to establish a requirement for the User's device on the mandatory permission to receive and receive cookies.

**6.4.** The structure of the cookie file, its content and technical parameters are determined by the Operator and may change without prior notice to the User.

**6.5.** The counters placed by the Operator in the Information Service can be used by the Operator to analyze cookies and collect personal data on the use of the Information Service in order to improve the quality of the Information Service, the level of convenience of their use, improvement of the Information Service. The technical parameters of the operation of the meters are determined by the Operator and may be changed without prior notice to the User.

## **7. ACCESS TO PERSONAL DATA**

**7.1.** The right to access the User's personal data is only available to the Operator's employees who, by virtue of their official duties, are allowed to work with personal data

User on the basis of the list of persons admitted to work with personal data, which is approved by the Operator.

**7.2.** The list of employees who have access to personal data is maintained by the Operator up to date.

**7.3.** Access to the User's personal data by third parties who are not employees of the Operator, without the consent of the User, is prohibited, except in cases established by the International Rules of Law.

**7.4.** The access of the Operator's employee to the User's personal data is terminated from the date of termination of the employment relationship or from the date the employee loses the right to access personal data of the User in connection with a change in job duties, position or other circumstances in accordance with the procedure established by the Operator. In the event of termination of employment, all carriers with personal data of the User who were at the disposal of the dismissed employee of the Operator, are transferred to a higher-ranking employee in the manner prescribed by the Operator.

## **8. UPDATING, CORRECTION, DELETION AND DESTRUCTION OF PERSONAL DATA**

**8.1.** The user can at any time change, update, supplement or delete the personal data provided by him or part of it using the interface Information Service.

**8.2.** In case of independent detection by the Operator of the fact of incompleteness or inaccuracy the User's personal data The Operator takes all possible measures to update personal data and make appropriate corrections.

**8.3.** If it is impossible to update incomplete or inaccurate personal data of the User, the Operator takes measures to delete them.

**8.4.** If it is revealed that the processing of the User's personal data is unlawful, their processing by the Operator shall be terminated, and the personal data shall be deleted.

**8.5.** In the event that the interface of the Information Service is inoperable or there is no functionality of the Information Service to change, update, additions or deletions by the User of personal data, as well as in any other cases, the User has the right to demand in writing from the Operator the clarification of his personal data, their blocking or destruction if the personal data are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing.

**8.6.** The operator enters into personal data that is incomplete, inaccurate or irrelevant necessary changes within a period not exceeding seven working days from the date of provision by the User of information confirming that personal data is incomplete, inaccurate or out of date.

**8.7.** The operator destroys illegally obtained or not necessary for the stated purpose of processing the User's personal data within a period not exceeding seven working days from the date the User provides information confirming that such

personal data is illegally obtained or not necessary for the stated purpose of processing.

**8.8.** The Operator notifies the User of the changes made and the measures taken and takes reasonable measures to notify third parties to whom the personal data of this User were transferred.

**8.9.** The User's rights to change, update, supplement or delete personal data may be limited in accordance with the requirements of International Law.

## **9. RESPONSES TO USER REQUESTS FOR ACCESS TO PERSONAL DATA**

**9.1.** The User has the right to receive information from the Operator regarding the processing of their personal data, including the following:

**9.1.1.** confirmation of the fact of processing personal data by the Operator;

**9.1.2.** legal grounds and purposes of personal data processing;

**9.1.3.** the purposes and methods used by the Operator for processing personal data;

**9.1.4.** name and location of the Operator, information about persons (except employees of the Operator) who have access to personal data or to whom personal data may be disclosed on the basis of an agreement with the Operator.

**9.1.5.** processed personal data relating to the respective User, the source of their receipt, unless a different procedure for the provision of such data is provided international rules of law;

**9.1.6.** terms of processing personal data, including the terms of their storage;

**9.1.7.** the procedure for the User to exercise the rights provided for by the International Rules of Law "On Personal Data";

**9.1.8.** information about the performed or proposed cross-border data transfer;

**9.1.9.** the name or surname, name, patronymic and address of the person who processes personal data on behalf of the operator, if the processing is or will be entrusted to such a person;

**9.1.10.** other information provided for by the International Rules of Law.

**9.2.** The Operator provides free of charge the opportunity to get acquainted with the personal data processed and stored in the information system of the Operator when the User contacts or within thirty days from the date of receipt of a written request User.

**9.3.** If the Operator refuses to provide information about the availability of personal data about the User or personal data to the User upon his request or upon receipt of the User's request, the Operator shall provide a reasoned response in writing, which is the basis for such a refusal, within a period not exceeding thirty days from the date of the User's request or from the date of receipt of the User's request.

## **10. DETAILS ABOUT IMPLEMENTED PERSONAL DATA PROTECTION REQUIREMENTS**

**10.1.** Security of personal data during their processing in the information system is provided with the help of a personal data protection system that neutralizes current threats defined in accordance with the International Rules of Law "On Personal Data".

**10.2.** The personal data protection system used by the Operator includes legal, organizational, technical and other measures to ensure security personal data, determined taking into account actual threats to the security of personal data and information technologies used in information systems.

**10.3.** With regard to personal data in respect of which the User's consent to their processing by third parties has been provided, the Operator has the right to involve, on the basis of an agreement, another person who ensures the security of personal data during their processing in the information system.

**10.4.** When processing personal data in the information system of the Operator, the latter ensures:

**10.4.1.** taking measures aimed at preventing unauthorized access to the User's personal data and/or their transfer to persons who do not have the right to access such information;

**10.4.2.** timely detection of facts of unauthorized access to personal data;

**10.4.3.** prevention of impact on the technical means involved in the processing of personal data, as a result of which their functioning may be disrupted;

**10.4.4.** the possibility of immediate recovery of personal data, modified or destroyed due to unauthorized access to them;

**10.4.5.** constant control over ensuring the level of protection of personal data.

**10.5.** All employees of the Operator authorized to work with personal data, as well as those associated with the operation and maintenance of the information system personal data are familiar with the requirements of this policy, as well as with the internal documents of the Operator governing the procedure for working with personal data.

**10.13.** The Operator organized the process of training employees in the procedure for using personal data protection tools operated by the Operator. Employees are trained having constant access to personal data, and employees associated with the operation and maintenance of the information system of personal data and means protection of personal data.

**10.14.** The internal documents of the Operator establish that employees are obliged immediately inform the relevant official of the Operator about the loss, damage or shortage of information media containing personal data, as well as about attempts to unauthorized disclosure of personal data, its causes and conditions.

## **11. CONSENT TO PROCESSING OF PERSONAL DATA**

**11.1.** The user decides to provide his personal data and agrees to their processing freely, of his own free will and in his own interest.

**11.2.** Consent to the processing of personal data provided by the User is specific, informed and conscious.

**11.3.** Consent to the processing of personal data may be withdrawn by the User in accordance with the procedure established in accordance with International Law.

## **12. FINAL PROVISIONS**

**12.1.** The beginning of the use of the Information Service by the User means his consent to the terms of this policy. If the User disagrees with the terms of this policy, the use of the Information Service must be immediately terminated.

**12.2.** This policy and the relationship between the User and the Operator arising in connection with the application of this policy shall be subject to the application of International Law.

**12.3.** This policy is permanently publicly available on the Operator's website.

**12.4.** The User has the right to send all suggestions or questions about this policy to the Operator's User support service by sending an electronic email messages: [info@profitraiders.com](mailto:info@profitraiders.com)