

SPACEBOT LTD

Company number 12377061

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Privacy Statement for SPACEBOT personal data

PREAMBLE

The present document contains information on the regulation for using your data, your rights and duties, and rights and duties of our company regarding your personal data.

This Privacy Statement (hereinafter - Policy) applies to all information including personal data in perception of the legislation applied (hereinafter - "Personal data") which can be obtained by SPACEBOT and/or affiliated bodies including those being a part of our group in the process of using the program, SPACEBOT mobile application and in the process of performing any agreement and contract (notwithstanding whether we do this or our affiliated bodies) concluded with you with respect to the use of SPACEBOT program. We may as well receive Personal data from our partners (hereinafter - "Partners"), and all of the websites, programs, products and services used by you in such cases may transfer your Personal data only in cases established in the applicable law, and this is to be carried out in accordance with a specific treaty concluded between us and each of our Partners.

Considering the importance of confidentiality and integrity of Personal data of our users as well as of information material posted by users on our website, we put in place this Privacy policy for determining the order of making transactions with confidential data of all parties while using SPACEBOT.

Please note that the use of SPACEBOT program may be regulated by additional terms that can make amendments/additions to this Policy.

We are entitled to amend the Privacy at any time posting the edited version on this website indicating the date of effect. In case of making fundamental changes to this document we shall inform you via e-mail entered by you during the registration.

This Policy is applied to all program services as defined below, no matter how you use them or whether you use them via mobile device.

By accepting this Privacy Statement terms, user consents to processing of his/her personal data by the SUM AND SUBSTANCE LTD company incorporated in England at number 09688671 with the office registered to 30 St. Mary Axe, London, England, EC3A 8BF, which is the processor of Personal data in accordance with the data security regulation.

In certain cases provided by the existing legislation, *SPACEBOT LTD* directs the OOO (limited liability company) "Digital security technologies" to process personal data of program users. Processing of the specified Personal data may be conducted both with and without implementing automation tools including data processor responsible for the following duties related to users' data:

- Inspection of documents (passport);
- Verifying the digital authenticity;
- Data recognition;
- Checking with the reference base;

- Comparing individuals;
- Monitoring of similar users;
- Data storage.

OOO (limited liability company) "Digital security technologies" is the Personal data operator in accordance with the Federal act of 27.06.2006 №152 «On Personal Data" added to the Russian personal data operators register with the reference number 78-17-003488.

Please read the document carefully as it shall be mandatory in case you use any of the platform's services in the order specified below.

The latest version of this Policy published on 02.06.2020

1. TERMS

This document implies the following terms and phrases unless otherwise is specified:

"Personal data", "Personal information", "personal information", or "Your data" is applied to any information related to the directly or indirectly specified or defined individual (data subject).

SPACEBOT – a computer program.

SPACEBOT mobile application (hereinafter - "App") is the software accessible to user via Application Store under conditions of full compliance with Agreement representing an information application designed for mobile devices operating in the basis of Android and Apple iOS. Intellectual property rights over the App belong to the company.

Materials derived from the Program

— any program, work or information developed by user or some third party with the use of the Program or some part of it.

Program Usage — any actions associated with the Program functioning in accordance with its purpose.

Client assistance system — a software installed on Mobile application which implies users' support service.

Confidential information — the Program's content and all the derived works associated with the Program, including, but not limited to, all updates and modifications.

Account, personal SPACEBOT account -

relates to account of user accessible via SPACEBOT program.

This is the personal page of a registered user with its personal number, and accessible only by registered user who has login name and password from the page which represents a computer program with an interface developed and accessible by SPACEBOT mobile application or some other accessible way.

"Digital assets" - the digital representation of value understood as "cryptocurrency", "virtual currency" or "digital currency" such as Bitcoin, Ethereum or Prizm which is based in cryptographic protocol of computer network, either centralized or decentralized, with either close or open source code, and can be served as a medium of exchange and/or store of value.

“Processing of personal data” - any action (operation) or set of actions (operations) made with the use of automation tools or without using such tools with personal data including collection, record, systematization, clarification (updates or changes), extraction, use, transfer (dissemination, providing, access), depersonalization, blocking, deletion of data.

“Personal data privacy” - for compliance by operator or another person that got access to personal data, the requirement to prevent these data from being disseminated without the consent of data subject or another legal cause.

“user”, “client” – person that has access to SPACEBOT program

“Cookies” - small piece of data sent by web server and stored on user’s computer. This piece of data is being sent by web-client or web-browser to web-server in the HTTPS request while attempting to open a certain website.

“IP-address” — a unique node network address on the network build under the IP protocol.

Personal data operator:

For ensuring the enjoyment of SPACEBOT usage, Personal information is being collected and used by SPACEBOT, the body corporate organized under the laws of England and Wales, or by the affiliated bodies providing the related service. You can find the information regarding which body provides certain service in the context of the service use.

Personal data operator:

SUM AND SUBSTANCE LTD, incorporated in England at number 09688671, with the office registered to 30 St. Mary Ace, London, England, EC3A 8BF.

Accepting the conditions of this Privacy Statement, the data subject gives consent on delegating the responsibility of personal data processing to another person.

The administration of SPACEBOT consists of employees authorized to manage the application, program and operating on behalf of SPACEBOT. Apart from the above mentioned duties, they organize and (or) make personal data processing and define objectives for this as well as the data to be processed and the operations carried out with personal data.

2. GENERAL PROVISIONS

2.1. Usage of SPACEBOT program including working with the mobile application implies acceptance of this Privacy statement and the personal data processing conditions of user.

2.2. In case of disagreement with the conditions of Privacy statement user should stop operating with SPACEBOT application.

2.3. This Privacy statement is to be applied only to SPACEBOT program, websites and the mobile application that bear no responsibility for other websites user may visit via links found on SPACEBOT App.

3. PERSONAL DATA PROTECTION MEASURES

3.1. We use encryption for protecting data provided by you and for storage of decryption keys in selected systems. Operator and handler of personal data process them and store your personal information on our server in data centre.

3.2. In cases provided for by law, we undertake to appoint employees to protect Your personal data, who will be responsible for compliance with the privacy policy.

3.3. We are making every effort to protect your personal data from unauthorized access, disclosure or destruction of information that we collect and store.

3.4. Measures we take:

- SSL encryption;
- implementation of two-factor authentication
- analysis of methods for collecting, storing and processing information.

We conduct events to train our employees on how to work with personal data.

We strive to ensure that our methods of processing and storing your personal data fully comply with the applicable law.

Unfortunately, despite the security measures we take, the transmission of information over the Internet is not fully secure. Despite we are making our best to protect your personal data, we cannot guarantee the security of your personal data during transmission, and therefore all actions to transfer your personal data are performed at your own risk.

If you have any questions about how we protect or use your personal data you can contact us by email at the user support address.

4. SUBJECT OF THE PRIVACY STATEMENT

4.1 This privacy Policy sets out the obligations of the SPACEBOT Administration for non-disclosure and ensuring the confidentiality of personal data that the User provides at the request of the SPACEBOT Administration when registering using the SPACEBOT program.

Personal information that you provide during the registration process may be saved, even if your registration is left incomplete.

If you are located within the European economic area, Russia, or some other countries, this information will not be stored without your consent.

By providing us with the personal data of any person (other than yourself) during your use of our platform, you provide us with a guarantee that you have received consent from such person to disclose their personal data to us, as well as his / her consent to the processing, use and disclosure of such personal data for the purposes and in the manner set out in this privacy Policy.

4.2. Information we collect:

Personal information collected during the operation of the SPACEBOT program or application may differ depending on whether you use your account to access the SPACEBOT program or not. When you log in to your account, the Personal information we collect about you while using the program may be combined with and linked to other Personal information we collect as part of your use of your account (for example, your personal information, contact information, age and gender, if provided when registering on our other sites). We do not verify the Personal information provided by you, except as provided in the user agreement or the terms of use of individual services, and cannot judge its accuracy, as well as whether you have sufficient legal capacity to provide Your Personal information. However, we assume that you provide accurate and sufficient Personal information and update it timely.

4.2.1. Information you provide us:

When using the platform, we have the right to collect and use the following data about you:

- full name;
- Home address, including country of residence;
- Email address;
- mobile phone number;
- date of birth;
- proof of identity (for example, a driver's license, passport, or identity card issued by a government Agency);
- social security number or any comparable identification number issued by a government Agency;

- other personal information or commercial and / or identification information that, in our sole discretion, is necessary for us to fulfill our legal obligations to comply with anti-money laundering (AML / CFT) legislation, for example, in accordance with the 4th EU anti-money laundering Directive, etc.

4.2.2 Information that we collect about You automatically.

- Information about Your location.

- Information that is automatically collected through analytics providers to determine your location, including your IP address and / or domain name, as well as any external page that connects you to you, your login information, browser type and version, time zone setting, types and versions of browser plug-ins, operating system and platform;

- Log information - information that is created while using the platform services that is automatically collected and stored in our server logs. This may include, but is not limited to, device-specific information, location information, system activity, and any internal and external information related to the pages you visit, including the full url of the single URL (URL), through and from our website or app (including date and time, page response time, loading errors, duration of visits to certain pages, page interaction information (such as scrolling, clicks, etc.), and methods used to navigate from the page;

- Information about the account SPACEBOT;

- Correspondence - information that you provide to us in written or oral correspondence, including opening a SPACEBOT account, with customer support, including phone numbers used to contact us.

4.2.3. Information about you that we may obtain from other sources.

We may receive information about you if you use any other website that we use or other services that we provide.

We may receive information about you from third parties, such as:

- from the banks that you use to transfer money to us, provide us with your basic personal information, such as Your name and address, as well As your financial information, such as your Bank account details;

- from business partners who can provide us with your name and address, as well as other, including financial information;

- advertising networks, search engines that may provide us with anonymous or revoked information about you, such as confirmation of how you found our app

- and so forth.

5. PURPOSES OF COLLECTING USER'S PERSONAL INFORMATION

5.1. General provisions.

Taking into account:

- our legitimate interests in ensuring that our company continues to innovate and improve the SPACEBOT program,
- the need to process your personal data for the purpose of fulfilling obligations when necessary (for the performance of an obligation you shall be a part of),
- as well as our legal obligations that we must comply with when processing your personal data in accordance with the requirements of current legislation,

we use different methods of processing your personal data, depending on the relevant grounds.

5.2. the SPACEBOT Administration may use the user's Personal data for the following purposes:

- Identification of the user registered in the App;
- Providing the User with access to personalized app resources;
- Establishing feedback with the user, including sending notifications, requests related to the use of the App, providing services, processing requests and requests from the User;
- Determining the user's location to ensure security and prevent fraud;
- Confirmation of the accuracy and completeness of personal data provided by the user;
- Providing the user with effective customer and technical support in case of problems related to the use of the SPACEBOT program;

- Providing the users with their consent, special offers, information about new services, newsletters and other information on behalf of SPACEBOT or on behalf of SPACEBOT partners.

5.3. When making decisions about the processing of Your personal data, we analyze the risks of using your personal data in order to comply with your rights and legitimate interests.

5.4. We may process your personal data for more than one legal reason, depending on the specific purpose for which we use Your data, including:

- in order to effectively fulfill our contractual obligations, provide you with a quality service, and comply with the rules that are imposed on us by current legislation, we process the information you provide.
- in order to comply with legal and / or regulatory requirements, including, but not limited to, anti-money laundering requirements, taking into account our legitimate interests and legal obligations, as well as the need to fulfill obligations to which you are a party, we process the information you provide, information about your devices, and information about third parties.
- implementing anti-fraud measures, in order to verify your identity to protect against fraud, in order to comply with current legislation, as well as to confirm the right to use our products and services, to ensure the security of our services, we process the information you provide, information about your devices, information about third parties.
- in order to provide you with information about new features, functions or services of the platform, recommendations for you and other users, processing applications for the platform services, taking into account our legitimate interests, we process information provided by You, information about your devices, information about third parties.
- in order to ensure that the platform can operate properly, manage internal operations necessary for the operation of the platform, including troubleshooting, data analysis, testing, research, statistical and research purposes, and notify You of changes to our service, changes to our terms, and as part of our efforts to ensure the security of the platform, we process the information you provide, information about your devices

If you have any questions about the specific legal basis for processing your personal data please contact us at customer support.

6. METHODS AND TERMS OF PROCESSING PERSONAL INFORMATION

6.1. General provisions.

The user's personal data is processed during the period Of your use of our application until we receive Your Application for revocation of permission to process your data, sent in accordance with the procedure established in clause 13.7 of this Policy, in any legal way, including in personal data information systems using automation tools or without using such tools.

In case of loss or disclosure of personal data, SPACEBOT Administration informs the user about the loss or disclosure of personal data.

6.2. Disclosure of personal data

The administrator undertakes not to provide personal data of users to third parties for commercial purposes without the consent of the User to whom this data relates, except for the cases specified in this Privacy Statement, as well as in cases stipulated by law. Including:

6.2.1. We may share your personal information with third parties, including:

- Affiliates, business partners, parties to contracts for the performance and performance of any contract that we enter into with them or with you;
- Аналитиков и субъектов поисковых систем, которые помогают нам в улучшении и оптимизации нашего приложения;

6.2.2. We may disclose your personal information to third parties if:

- We sell or buy any business or assets, in which case we may disclose your personal information to a potential seller or buyer of such business or assets in order to continue providing services to You.

6.2.3. We are required to disclose your personal data in order to comply with any legal obligation or to ensure compliance with or application of our internal documents (including the terms of use of the platform, etc.) and other applicable agreements; or to protect the rights, property, or security of the platform, our customers, or others. This

includes sharing information with other companies and organizations in order to protect against fraud and comply with other measures established by applicable law.

6.3. Whenever it is reasonable and appropriate, we conduct and assist in investigations of illegal activities. In particular, we strive to:

- prevent and detect fraud and other criminal activities;
- comply with the requirements of state bodies;
- protect the platform from financial and insurance risks;

6.4. We cannot publish an exhaustive list of all third parties with whom We share your personal data, as the list of such parties depends on your specific use of our services.

If you want to get more information about who we share your personal information with, or to provide you with a list that interests you, you can request this by writing to the customer support service.

6.5. Data exchange outside the European economic area

In some cases (including in order to meet your needs), we need to transfer your personal data to third parties located outside the European economic area.

In these cases, we guarantee that both we and our partners must take the necessary security measures to protect your data.

By using our platform, you consent to the transfer of your personal data to other countries, including countries that have different data protection rules that differ from those established in Your country. In all such transfers, we will protect your personal information as described in this privacy Policy.

For more information, please contact us at the customer support address.

6.6. Profiling and automation of decision making

In some cases, including in order to meet Your needs, We may use your personal data, such as your country of residence and trade history. For example, if you frequently trade in a particular virtual currency, we may use this information to inform you of new platform updates. When we do this, we take all necessary measures to protect your privacy and security, and we only use anonymous or de-identified data.

We can use automated decision making (ADM) to improve your experience or help fight financial crime. For example, in order for us to provide you with a fast and efficient service, we may use ADM to verify your identity documents or to verify the accuracy of the information provided to us.

6.7. Privacy when using digital assets and blockchain.

Your use of bitcoin, ether, and other digital assets can be "recorded" in a public blockchain. Using public blockchains can lead to unintended disclosure of private information.

Given the decentralized nature of the blockchain, participation in the blockchain of third-party networks that are not controlled or managed by our platform, we cannot erase, modify or change Your personal data from such networks.

7. STORAGE OF PERSONAL DATA

10.1. General provisions.

Our operations are supported by a network of computers, servers, and other infrastructures and information technologies, including, but not limited to, third-party service providers. We and our third-party service providers store and process your personal data in the Russian Federation and in the European economic area.

10.2. Since the platform complies with the requirements of current legislation, including AML compliance, we are required by law to store some of Your personal and transactional data, which will only be used if absolutely necessary. We will delete data that is no longer required by applicable law.

11.

Use of cookies and similar technologies

When you use our app, we may use Cookies on your computer or other devices used to visit our app. We use Cookies to help us recognize you as a customer, collect information about your use of our services to better customize our services and content for You, and collect information about your computer or other access devices to ensure that we comply with our AML obligations and ensure that your account security is not compromised by detecting irregular or suspicious account activity.

We use both "session" and "permanent" Cookies. The session cookie expires when You log out of your account or close the browser. Cookies remain on your computer or mobile device until they are deleted. Most web browsers are configured to accept Cookies by default.

12. OBLIGATIONS OF THE PARTIES

12.1. The user must:

12.1.1. Provide accurate information about your personal data required to use the app.

12.1.2. Update and Supplement the provided information about personal data in case of changes to this information.

12.2. SPACEBOT administration must:

12.2.1. Use the information obtained exclusively for the purposes specified in this privacy Policy.

12.2.2. To ensure that confidential information is kept confidential, not to disclose without the User's prior written permission, and not to sell, exchange, publish, or otherwise disclose the User's personal data transmitted, except as provided in this Privacy Policy.

12.2.3. Take precautionary measures to protect the confidentiality of the user's personal data in accordance with the procedure usually used to protect this type of information in existing business transactions.

12.2.4. Block personal data related to the relevant User from the moment of request or request of the User or his / her legal representative or authorized body for the protection of the rights of personal data subjects for the period of verification, in case of identification of inaccurate personal data or illegal actions.

12.3. Release the SPACEBOT Administration from liability.

In case of loss or disclosure of Confidential information, SPACEBOT Administration is not responsible if this confidential information:

- Became public domain before it was lost or disclosed.
- Was received from a third party before it was received by the SPACEBOT Administration.
- Was disclosed with the User's consent.

13. USER RIGHTS

13.1 In accordance with applicable laws and regulations, we may from time to time send you information about products, additional services or events using the information we receive from You. When you create a SPACEBOT account, you agree to receive informational messages from us. We provide the option to opt out of receiving all messages from us (newsletters, etc.). We will never share your personal information with third parties for direct marketing or other unrelated purposes without your written consent. We cannot allow you to opt out of emails that we send to you for certain legal or administrative purposes.

13.2. Cookies.

You can opt out of session cookies if you have permission to use your browser or browser, but choosing to delete or disable our cookies may interfere with Your use and features of the platform.

13.3. Right to correction.

You have the right to correct any personal information.

13.4. Right to delete (forget).

You have the right to ask us to delete your data when we no longer need it for the purposes of fulfilling our obligations and complying with applicable laws.

13.5. You may have the right to transfer certain personal data between personal data operators, for example, to move your account data from one online platform to another.

13.6. Location information.

You can stop collecting location information through your device settings or perform a standard deletion process to remove our apps from your device; however, since we use such data to meet legal requirements, as well as to continuously monitor fraud and risk, choosing to delete or disable location services may interfere with your use of the platform's services.

13.7. At any time, you can revoke your consent to the processing of personal data by sending us a Request to revoke your consent to the processing of personal data, filled out in the form set out in Annex 1 to this Policy.

Information for citizens of the Russian Federation: after receiving a request to prohibit the use of personal information, the operator must stop working with the data and, if possible, ensure their destruction. The period within which the operator must fulfill this obligation, in accordance with paragraph 5 of article 21 of law No. 152-FZ, does not exceed thirty days. Federal law imposes certain restrictions on the withdrawal of the authorisation to the processing of information. The operator can process and transmit data if it is necessary for the execution of justice (paragraph 2 of part 2 of article 11 152-FZ) or to protect the life (health) of the subject (paragraph 6 of part 2 of article 11 152-FZ).

14. Access to information

In accordance with current legislation, you may have the right to access the information we have about you. Your right of access may be exercised in accordance with the relevant data protection legislation.

15. Changes to this Privacy Statement

Any changes we may make to our privacy Notice will be posted on this page and, if necessary, will be emailed to You. Please check for updates or changes on the specified page.

16. The protection of minors

The platform's services are not intended for persons under the age of 18, hereinafter referred to as "Minors", and we do not knowingly collect personal information from minors.

If we learn that we have accidentally collected personal information from a minor, we will take legally permissible steps to remove this information from our records. The platform will require the user to close their account and will not allow them to use their services.

17. Our contacts

Any questions, comments or requests regarding this privacy Policy are welcome and should be addressed to the user support service.

If you believe that we do not respond to your questions or concerns, you can contact the personal data operator.

18. DISPUTE RESOLUTION

18.1. before filing a claim in court for disputes arising from the relationship between the app User and the SPACEBOT Administration, it is mandatory to submit a claim (a written proposal for a voluntary settlement of the dispute).

18.2. The recipient claims within 30 calendar days from the date of receipt of the complaint, notify the Complainant about the outcome of a claim.

18.3. if an agreement is not reached, the dispute will be referred to a judicial authority in accordance with the current legislation of England and Wales

18.4. the current legislation of England and Wales applies to this privacy Policy and the relationship between the User and the SPACEBOT Administration.

Appendix 1. Form for revoking consent to the processing of personal data .

Director

(name of the operator processing personal data)

from _____

(Full name of the personal data subject)

(Passport data of the personal data subject)

(registration address of the personal data

subject)

STATEMENT

to revoke consent to the processing of personal data

I, _____ withdraw your consent previously issued

(name of the operator processing personal data)

to process my personal data

Please send a response to this request in writing to:

_____ within the time limits set by law.

_____ / _____

(signature)

(transcript of the signature)

Date: