

## Privacy Policy

### coinpass.com

#### CONTENTS

Introduction | Acceptance and Changes | Data and Information | Information Usage | Information Disclosure | Information from Third-Party Providers | Security and Storage | Children's Information | Information Access | Information Retention | Rights to the use of Personal Information | Contact Us | Complaints

#### ANNEX A: HOW DO WE USE YOUR PERSONAL INFORMATION?

- To verify your identity and establish and manage your account
- To provide you with products and services, or information about our products and services, and to review your ongoing needs
- To help us improve our products and services, including customer services, and develop and market new products and services
- To form a profile about you
- To investigate or settle inquiries or disputes
- To comply with applicable law, court order, other judicial processes, or the requirements of any applicable regulatory authorities
- To send you surveys
- Data analysis
- Marketing by us
- Internal business purposes and record keeping
- Corporate restructuring

#### INTRODUCTION

OANDA coinpass Limited ("coinpass") respect and protect the privacy of all visitors to our websites and our users who use our services. The Privacy Policy explains how coinpass Limited collects, uses, discloses, and protects user information. The policy applies to information coinpass collects when users access or use coinpass' websites or otherwise interact with us as described below.

#### ACCEPTANCE AND CHANGES

Users by accessing and using coinpass' Services, signify that the user ("you") have reviewed the terms of this Privacy Policy. Where coinpass require the consent of a user to process the personal information, coinpass will request consent to the collection, use, and disclosure of their personal information as detailed in the Privacy Policy below. coinpass may issue further notices that may supplement or clarify coinpass' privacy practices or may provide users with additional choices about how coinpass processes user data. A user that does not agree with or is not comfortable with any aspect of this Privacy Policy, should immediately discontinue access or use of coinpass Services.

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coinpass may amend this Privacy Policy from time to time. If coinpass makes changes, coinpass will notify the user by revising the date at the top of this policy. coinpass strongly encourage users to review the Privacy Policy from time to time whenever they access or use coinpass Services to be up to date and informed about our information practices and users' privacy rights and choices.

## **DATA AND INFORMATION**

coinpass collects and processes personal information for the purposes of preventing money laundering, terrorist financing, or proliferation financing and with your prior consent, this personal information will be used by us as part of the provision of our Services. When coinpass requests certain personal information from users it is because such information is relevant for specified purposes. Any information users provide to coinpass that is not a requirement, is done so on a voluntary basis, and please see Annex A for fuller details on how we use your personal information. Please note users are free to choose whether to provide coinpass with the types of personal information described below, but coinpass may not be able to provide services as effectively or even offer part or all of our Services. Types of information coinpass typically collect from users are as follows:

### Contact Information

- Name, address, telephone number, and email address

### Financial Information

- National bank account details, credit and debit card details

### Identification Numbers

- National Insurance number or government identification numbers

### Personnel Information

- Date of birth, gender, occupation, employment status, and other optional information

coinpass may also obtain information from other sources and combine that with the information provided. In addition, coinpass also stores information when users use coinpass services such as:

### Transaction Information

- Information about the transactions users complete via coinpass Services

### Device Information

- coinpass collects information about the devices users use to access coinpass Services

### Cookies

- coinpass may use cookies, pixel tags, and other tracking technologies to collect information about users when they interact with coinpass

## **INFORMATION USAGE**

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The purpose of collecting personal information by coinpass is to provide users with a secure, smooth, and efficient service. coinpass uses personal information to create, develop, operate, deliver, and improve our Services, content, and advertising, and for loss prevention and anti-fraud purposes. coinpass may use this information in the following ways:

- Account Management, send technical notices, updates, security alerts, and administrative messages
- Provision of customer support and services requests by the user Improve security, prevent fraud, monitor, and verify identity or service access
- Combat spam or other malware or security risks Transactions processing and sending transaction alerts
- Identity verification of personal information against third-party databases
- Prevent potentially prohibited or illegal activities and enforce coinpass user agreements
- Delivery of marketing and promotional offers, and notify users of partner events
- Customise, measure, and improve a user's personal experience
- Comply with legal and regulatory obligations, enforce agreements with third parties
- Prevent potentially prohibited or illegal activities, and/or violations of coinpass user terms
- Resolve disputes, collect fees, and troubleshoot the problem Quality control and staff training

coinpass will not use a user's personal information for purposes other than those purposes coinpass have disclosed to them, without their permission. From time-to-time, coinpass may request a user's permission to allow coinpass to share a user's personal information with third parties.

Users may choose not to have their personal information shared with third parties where coinpass rely on consent as the lawful basis for processing their personal information. Users can also choose not to allow coinpass to use their personal information for any purpose that is incompatible with the purposes for which coinpass originally collected it, if users choose to limit the use of their personal information, certain coinpass features, or services may not be available.

## **INFORMATION DISCLOSURE**

coinpass may disclose any information coinpass collects about a user, whether a user is active or inactive, this includes non-public personal information and any other information coinpass collects with non-affiliated third parties, including non- financial companies. Information disclosures may be made to:

- Service providers for marketing services on coinpass behalf
- Normal business purposes, e.g. processing transactions, maintaining accounts, or reporting
- Share user information to comply with our legal obligations or investigations

In addition, other than in connection with a merger, acquisition, or sale of coinpass Limited, coinpass will not sell or rent any of a user's information to third parties for their own marketing purposes. Note that third parties that support our customer identification and anti-fraud controls may retain and use information about users to perform services on our behalf and to improve their services.

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By using coinpass Services, users consent to the retention and use of such information by these providers to improve their services.

## **INFORMATION FROM THIRD-PARTY PROVIDERS**

coinpass allows other entities to provide analytics services on their behalf. These entities may use cookies, web beacons, and other tracking technologies to collect information about users. This information may be used by coinpass to, among other things, analyze, and track data, determine the popularity of certain content, and better understand user online activity.

coinpass may obtain information about users from third-party sources as permitted by applicable law, such as public databases, credit bureaus, ID verification partners, resellers and channel partners, joint marketing partners, and social media platforms. Once coinpass obtains such information from third parties, coinpass does not subsequently share it with any other third parties except as described in this Privacy Policy.

## **SECURITY AND STORAGE**

coinpass implements security practices and procedures to help protect the confidentiality and security of user information, including any nonpublic personal information. coinpass protects user information using reasonable physical, technical, and administrative security measures, including limiting access to user information to employees with a need to know such information.

Users have available to them the following selection criteria:

- coinpass uses both session and persistent cookies. Session cookies expire when users log out of their accounts or close their browsers. Persistent cookies remain on a user's computer or mobile device until they are erased or expired. Users are free to decline most of our cookies if their browser or browser add-on permits, however choosing to remove or disable coinpass cookies may interfere with their use and functionality of the coinpass Services.
- Users may access and review or update online account information at any time by logging into their coinpass account and viewing their profile. Note: even when the account is closed coinpass may retain their information as required by law or for legitimate business purposes.
- Users may opt out of receiving promotional communications from coinpass by following the online instructions in those communications. Opting out of receiving promotional communications, may still mean coinpass send users messages that coinpass are required to communicate to users relating to the operation and administration of their account.

coinpass understands the importance of user privacy, which is why coinpass has put in place appropriate physical, technical, and administrative safeguards to protect the security and confidentiality of a user's personal information. coinpass stores and processes all or part of a user's personal information and transaction data in a secure location. coinpass protects users' personal information by maintaining physical, electronic, and procedural safeguards in compliance with the applicable laws and regulations.

coinpass does not guarantee that loss, misuse, unauthorized acquisition, or alteration of user data will not occur. Users must recognize that they have a vital role in protecting their own personal information, by

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creating a secure password that is confidential from all third parties. coinpass cannot ensure or warrant the security or confidentiality of user information that users provide to coinpass via the Internet or wireless connection, including email, phone, or SMS, since coinpass has no way of protecting that information during its transmission.

Users should notify coinpass immediately if they become aware that their personal information has been compromised.

## **CHILDREN'S INFORMATION**

coinpass does not knowingly request to collect personal information from any individual under the age of 18. If a user submitting personal information is suspected of being under 18 years of age, coinpass will require the user to close the account and terminate all access. Please notify coinpass if you know of any user under the age of 18 using our website.

## **INFORMATION ACCESS**

Users have a right to access the information coinpass hold about them. Users are entitled to review, correct, delete, or edit their personal information. Users can do this at any time by logging in to their account and going into their Profile.

If users close their coinpass Account, the user account will be marked as "Achieved" but coinpass will keep the user account information in their database for a period of time as allowed by applicable law. The reason for the retention is 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. Please note once an account is closed, a user's personal information will not be used by us for any further purposes, sold, or shared with third parties.

## **INFORMATION RETENTION**

coinpass will retain a users' personal data for as long as is necessary for the purposes of:

- maintaining coinpass services
- fulfilling any contractual obligations
- legal and regulatory purposes

## **RIGHTS TO THE USE OF PERSONAL INFORMATION**

Users can object to our use of their personal information for direct marketing purposes at any time and they may have the right to object to coinpass processing some or all of their personal information in some other circumstances. If a user wishes to exercise any of these rights, please contact coinpass via [support@coinpass.com](mailto:support@coinpass.com).

## **CONTACT US**

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If users have questions or concerns regarding this Privacy Policy, or if have a complaint, please contact coinpass at [support@coinpass.com](mailto:support@coinpass.com).

## COMPLAINTS

Users can also complain about coinpass processing of their personal information to the relevant data protection authority. Users can complain in the EU member state where they live or work, or in the place where the alleged breach of data protection law has taken place. In the UK, the relevant data protection authority is the Information Commissioner's Office (ICO).

## ANNEX A: HOW DO WE USE YOUR PERSONAL INFORMATION?

We may use personal information for the following purposes:

- To verify your identity and establish and manage your account

As part of our providing, you with, or information about our services, under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended) coinpass is legally required to verify your identity before establishing a business relationship or entering into an occasional transaction with you.

Therefore, any personal data received from you will only be processed for the purposes of preventing money laundering or terrorist financing, or proliferation financing and this may include third parties carrying out electronic identity verification checks on our behalf. This personal information will also be used with your prior consent to allow us to effectively establish and manage your account with coinpass in order that you receive the best possible level of service from us.

- To provide you with products and services, or information about our products and services, and to review your ongoing needs

Once you open an account with us or subscribe to an update or webinar, we will need to use your personal information to perform our services and comply with our obligations to you. It is also in our legitimate interests to ensure that we are providing the best products and services so we may periodically review your needs to ensure that you are getting the benefit of the best possible products and services from us.

- To help us improve our products and services, including customer services, and develop and market new products and services

We may from time to time use personal information provided by you through your use of the services and/or through customer surveys to help us improve our products and services. It is in our legitimate interests for us to use your personal information in this way to ensure that we provide you with the best products and services we can.

- To form a profile about you

We may from time to time use personal information about you to form profiles about you so that we can understand you and provide the very best products and services we can. We may also make decisions about you through automated profiling or automated credit checks which may affect your ability to use our services. We may need to do this either to perform our legal obligations or because it is in our legitimate interest to use your personal information in such a way.

- To investigate or settle inquiries or disputes

We may need to use personal information collected from you to investigate issues and/or settle disputes with you as it is in our legitimate interests to ensure that issues and/or disputes get investigated and resolved as quickly and efficiently as possible.

- To comply with applicable law, court order, other judicial processes, or the requirements of any applicable regulatory authorities

We may need to use your personal information to comply with applicable laws, court order, other judicial processes, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

- To send you surveys

From time to time, we may send you surveys as part of our customer feedback process, and it is in our legitimate interest to ask for feedback to ensure that we provide the best service to you. However, we may from time to time also ask you to participate in other surveys and if you agree to participate in such surveys, we rely on your consent to use the personal information we collect as part of such surveys. All responses to any survey we send out whether for customer feedback or otherwise will be aggregated and depersonalized before survey results are shared with any third parties.

## **Data analysis**

Our web pages and emails may contain web beacons or pixel tags or any other similar type of data analysis tools that allow us to track the receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. Where your personal information is completely anonymized, we do not require a legal basis as the information will no longer constitute personal information. However, where your personal information is not in an anonymized form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

## **Marketing by us**

We may use your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns) to ensure that you are always kept up to date with our latest products and services. Where we send you marketing communications, we will either do so as it is in our legitimate interest or with your consent.

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## **Internal business purposes and record keeping**

We may need to process your personal information for internal business and research purposes and record-keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services we provide to you and our relationship with you. We will also keep records to ensure that you comply with your obligations under any contract you have entered into with us.

## **Corporate restructuring**

If we undergo a corporate restructure or part or all of our business is acquired by a third party, we may need to use your personal information in association with that restructure or acquisition. Such use may involve disclosing your details as part of a due diligence exercise. It is in our legitimate interest to use your information in this way provided we comply with any legal obligation we have to you.

## **THE PERSONAL INFORMATION WE HOLD ON YOU**

The information about any rights that might be available to you in relation to the personal information we hold about you is set out below.

### **Access**

If you ask us, we will confirm whether we are processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable administration fee.

### **Rectification**

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal information with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

### **Erasure**

You can ask us to delete or remove your personal information in certain circumstances such as where we no longer need it or you withdraw your consent (where applicable) provided that we have no legal obligation to retain that data. Such requests will be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations and subject to the section 'How do we store personal information and for how long'. If we have shared your personal information with others, we will let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

### **Processing Restrictions**



You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It will not stop us from storing your personal information though. We will tell you before we lift any restrictions. If we have shared your personal information with others, we will let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

### **Data Portability**

Under the General Data Protection Regulation (679/2016), you have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used, and machine-readable format) and to reuse it elsewhere or ask us to transfer this to a third party of your choice.

### **Objection**

You can ask us to stop processing your personal information, and we will do so if we are:

- relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
- processing your personal information for direct marketing; or
- processing your personal information for research unless such processing is necessary for the performance of a task carried out in the public interest.

### **Automated decision-making and profiling**

If we have made a decision about you based solely on an automated process (e.g., through automatic profiling) which impacts your ability to use the services or has another significant effect on you, you can ask not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us. Even where a decision is necessary for entering into or performing a contract, you may contest the decision and require human intervention.