

VENUS EXCHANGE SERVICES OÜ

PRIVACY POLICY

2020

1. Definitions

As used herein, the following terms are defined as follows:

- **“Venus Exchange Services OÜ,”** “Venus OÜ,” “We,” and “Us” “Venus OÜ” refers to Venus Exchange Services OÜ and its wholly owned subsidiaries (also referred to collectively as " Venus OÜ Services Ltd" "Venus OÜ" "we," or "us").
- **“Digital Asset”** is a digital representation of value (also referred to as “cryptocurrency,” “virtual currency,” “digital currency,” “crypto token,” “crypto asset,” or “digital commodity”), such as bitcoin, XRP or ether, which is based on the cryptographic protocol of a computer network that may be (i) centralized or decentralized, (ii) closed or open-source, and (iii) used as a medium of exchange and/or store of value.
- **“Venus OÜ Account”** means a user-accessible account offered via the Venus OÜ where Digital Assets are stored by Venus Exchange Services OÜ
- **“.com” or “.io”** means Venus OÜ branded websites, applications, services, or tools operated by Venus Exchange Services OÜ group companies.

2. IMPORTANT INFORMATION AND WHO WE ARE

2.1. WHO WE ARE

Venus Exchange Services OÜ, with registration No. 14732050, licensed by Financial Intelligence Unit (“FIU”) into providing services of exchanging a virtual currency against the fiat currency (FVR001315) and providing a virtual currency wallet service (FRK001196) having its registered address at Harju maakond, Tallinn, Kesklinna linnaosa, Roosikrantsi tn 2-KRM2, 10119, an entity existing under the laws of Estonia (“**Venus OÜ**”).

Venus OÜ respects and will protect the privacy of all users of the btc-land.com platform. In order to provide you with more accurate and personalized services, btc-land.com will use and disclose your personal information in accordance to this privacy policy. Except as otherwise stated in this privacy policy, btc-land.com will not disclose or provide any information to third party sources without prior consent from the user or as required by law. By using any part of the btc-land.com platform, you have agreed to the contents of this privacy policy.

Please read this carefully as this policy e is legally binding when you use our btc-land.com as defined below.

This Privacy Notice applies to any .com and .exchange or .io, as defined below, regardless of how you access or use them, including through mobile devices.

We may amend this Privacy Notice at any time by posting the amended version on this site including the effective date of the amended version. We will announce any material changes to this Privacy Notice via email.

2.2. PROTECTION OF PERSONAL DATA

We are serious about guarding the privacy of your Personal Information and work hard to protect Venus OÜ and you from unauthorized access to, or unauthorized alteration, disclosure, or destruction of Personal Information we collect and store. Measures we take include encryption with SSL; the availability of two-factor authentication at your discretion, and periodic review of our Personal Information collection, storage, and processing practices. We restrict access of your Personal Information only to those Venus OÜ employees, affiliates, and subcontractors who have a legitimate business need for accessing such information. We continuously educate and train our employees about the importance of confidentiality and privacy of customer information. We maintain physical, electronic, and procedural safeguards that comply with the relevant laws and regulations to protect your Personal Information from unauthorized access.

Unfortunately, despite best practices and technical safeguards, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data during transmission, and any acts of transmission are at your own risk.

2.3. PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how the Company collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to any of the services offered by the Company.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

This Privacy Policy is based on data protections rules and principles deriving from applicable law such as the Processing of Personal Data (Protection of Individuals) Law of 2007, the Regulation of Electronic Communications and Postal Services Law of 2004 and the General Data Protection Regulation (GDPR) (EU) 2016/679 effected as from the 25th of May 2018.

2.4. CONTROLLER

We are acting as the controller and responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us at support@btc-land.com

You have the right to make a complaint at any time to Estonia Data Protection Commissioner. We would, however, appreciate the chance to deal with your concerns before you approach the

Commissioner so please contact us in the first instance.

2.5. CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2.6. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

3. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

3.1. Application information

Personal information Client provides to the Company in its application form, such as name, address, date of birth, email address, income and income source etc. in order to facilitate the evaluation of Client's application. The information provides is also used for the purposes of communicating with the Clients.

3.2. Transaction information

Information about the anticipated volume and value of Client's transactions with us and income information provided in order to enable the construction of Client's economic profile.

3.3. Verification information

Information necessary to verify Client's identity, such as an identification card, passport or driver's license. This also includes background information the Company receives about the Client from public records or from other entities not affiliated with the Company.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly

or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3.4. IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel the contractual relationship you have with us but we will notify you if this is the case at the time.

3.5. Data Control

Venus OÜ is responsible for the collection, use, disclosure, retention and protection of your personal information in accordance with our privacy standards, this Privacy Notice, as well as any applicable local laws. Venus OÜ uses encryption to protect your information and store decryption keys in separate systems. Data controllers process and retain your personal information on our servers where our data centers are located.

Where we have a legal obligation to do so, we have appointed GDPR Officer to be responsible for Venus OÜ privacy program. If you have any questions about how we protect or use your Personal Information, you can contact our GDPR Officer by email at support@btc-land.com

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- 3.6. **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - 3.6.1. apply for our products or services;
 - 3.6.2. create an account on our website;
 - 3.6.3. subscribe to our service or publications;
 - 3.6.4. request marketing to be sent to you;
 - 3.6.5. enter a competition, promotion or survey; or
 - 3.6.6. give us some feedback.
- 3.7. **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites

employing our cookies.

3.8. **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as Technical Data from analytics providers such as Google based outside the EU;

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- A. Where we need to perform the contract we are about to enter into or have entered into with you.
- B. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- C. Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at the following email: support@btc-land.com

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please Contact us at support@btc-land.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile	Performance of a contract with you

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To process and deliver your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile (f) Transaction (g) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile (f) Transaction (g) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact details (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (a) Contact details (b) Profile (c) Usage (d) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	(e) Technical	
To use data analytics to improve our website, products/services, marketing, clients relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact details (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

4.1. **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

4.2. **PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered our website for the purpose of receiving information and, in each case, you have not opted out of receiving that marketing.

4.3. **PROFILING**

We may in some instances use your personal data, such as your country of residence and trade history, in order to better address your needs. For example, if you frequently trade in a specific virtual currency, we may use this information to inform you of new product updates or features that may be useful for you. When we do this, we take all necessary measures to ensure that your

privacy and security are protected, and we only use anonymous or de-identified data.

4.4. THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside the Company's group of companies for marketing purposes.

4.5. OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by Contacting us at any time at the following email address: support@btc-land.com

4.6. COOKIES

The Company's Technology provider may use "cookies" and other tracking technologies to collect Anonymous Information. A "cookie" is a small text file stored by a web browser when users access a website. Cookies enable the website browsed to save and identify the user's browsing activity and individual preferences, for example, to collect information about the User's activity in relation to the Services and it may serve to recall Personal Data previously indicated by a User, such as his/her user ID and password for access to the Service(s).

In particular, the Company's technology providers might be using "Flash Cookies" and/or local storage technologies to help users access the Client's accounts seamlessly and save their account settings to their browsers. Do note that most browsers allow controlling cookies, including whether or not to accept them and how to remove them.

4.6.1. Reasons why the Company is using Cookies

Cookies are used on the Company's website to:

- Identify the web browser and the settings;
- Verify our client's identity to ensure his/her personal data protection;
- Remember the client's individual preferences.

4.6.2. How are Cookies used by the Company

Cookies are downloaded by your browser whenever you access our websites. The stored data is used to track your browsing path and the pages you visit most frequently.

Your privacy is important to us, so the gathered information will be stored for a period not less than the one we are required to observe in order to comply with the applicable rules and regulations.

Cookies are commonly introduced to improve the efficiency of websites. By tracking our user's behavior, we seek to make our website more user-friendly and tailored to your preferences.

You can, if you wish, set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Cookies do not contain any executable code or software viruses. Instead, it is more like your personal ID that is updated whenever you access our website.

4.7. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at the following email: support@btc-land.com

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4.8. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with third parties for the purpose of carrying out our services, but should this be the case we check the issue

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. INTERNATIONAL TRANSFERS

We might need on certain occasions for the purposes of carrying out our services to transfer your personal data outside the European Economic Area (**EEA**)

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented: support@btc-land.com

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us at support@btc-land.com if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

6. DATA SECURITY

6.1. MEASURES WE TAKE TO SECURE YOUR DATA.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6.2. PRIVACY WHEN USING DIGITAL ASSETS AND BLOCKCHAINS

Your funding of bitcoin, XRP, ether, and other Digital Assets, may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

Because blockchains are decentralized or third-party networks which are not controlled or operated by Venus OÜ or its affiliates, we are not able to erase, modify, or alter personal data from such networks.

7. DATA RETENTION

7.1. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for five years after they cease being customers for regulatory purposes.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- 8.1. **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 8.2. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 8.3. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 8.4. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 8.5. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 8.6. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

8.7. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.



If you wish to exercise any of the rights set out above, please *Contact us at support@btc-land.com*

- Account Information – Information that is generated by your Venus account activity including, but not limited to, instructions regarding funding and disbursement, orders, trades, and account balances;
- Correspondence – Information that you provide to us in written or oral correspondence, including opening a Venus account, and with respect to ongoing customer support; and logging of phone numbers used to contact us.

General Provisions

Personal Information you provide during the registration process may be retained, even if your registration is left incomplete or abandoned. If you are located within the EEA, this Information will not be retained without your consent.

In providing the personal data of any individual (other than yourself) to us during your use of the .com or .exchange, you promise that you have obtained consent from such individual to disclose his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data for the purposes set out in this Privacy Notice.

- We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions and other applicable agreements; or to protect the rights, property, or safety of Venus OÜ, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;

In order to provide our Services to you, it may be sometimes necessary for us to transfer your data to the third parties that are based outside of the European Economic Area ("EEA"). In these cases, we ensure that both ourselves and our partners take adequate and appropriate technical, physical, and organizational security measures to protect your data. We also ensure we have appropriate contractual protections in place with these third parties.

By using Venus OÜ, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than 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 support@btc-land.com