Privacy Policy

in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)

1. Introduction

The protection of personal data is for CoinWatt, a.s. with registered office: Ľ. 54 799 724, registered in the Commercial Register of the District Court Bratislava I, Section Sa, File: 7463/B (hereinafter referred to as "CoinWatt"). When processing personal data, we are primarily governed by the EU General Data Protection Regulation (hereinafter referred to as "GDPR"), which regulates, among other things, your rights as a data subject, the provisions of the Personal Data Protection Act, as well as other regulations. How we process this personal data in detail, for what purpose we process it, what rights you have and how you can exercise these rights is in accordance with the relevant provisions of Art. 13 and 14 GDPR, described in more detail in this privacy policy.

2. Privacy Policy:

We process your personal data in accordance with the following principles set out in the GDPR:

(a) Legality, fairness and transparency

We process your personal data lawfully, fairly and transparently.

b) Purpose limitation

We collect your personal data for specifically identified, explicitly stated and legitimate purposes, and we further do not process your personal data in a way that is incompatible with those purposes.

c) Data minimisation

The personal data we process is adequate, relevant and limited to the extent necessary in relation to the purposes for which it is processed.

d) Accuracy

We keep your personal data correct and updated as necessary.

e) Minimisation of retention

We keep your personal data in a form that permits your identification for no longer than is necessary for the purposes for which we process your personal data.

f) Integrity and confidentiality

We guarantee adequate security of your personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage.

g) Liability

We will carry out any processing of your personal data responsibly and in accordance with the GDPR.

- 3. Scope of processing of Personal Data
- 3.1 We primarily obtain your personal data directly from you. During the process of registering and setting up an account on our website, you provide us with your email address (your login) and set up a password for your Account.
- 3.2 After setting up an Account, and before we provide you with any goods or services, we will ask you to provide additional information in order to verify your identity, in particular to assess the risk and screen for possible fraud, money laundering, terrorist financing or other financial crimes.
- 3.3 In this context, we will ask you in particular to provide identification data, e.g. to fill in your first name, surname and residence or registered office, for the purpose of fulfilling our legal obligations under Act No. 297/2008 Coll. on the Protection against the Money Laundering of Proceeds of Crime and on the Protection against the Financing of Terrorism and on the Amendment of Certain Acts, as amended (hereinafter referred to as the "AML Act").
- 3.4 We will then collect and process your payment details whenever you make a payment to us. If you provide us with bank account details, we will only use them to collect your payment to us and to make our payments to you.
- 3.5 Subject to the terms of the Agreement, we may request additional information from you in connection with the performance of our obligations under the AML Act and any other legislation or internal guidelines in order to verify your identity and assess your business risk under applicable AML legislation, such as a copy of
- (a) proof of identity; in the case of a legal entity, also proof of identity of the statutory bodies and proof of identity of the ultimate beneficial owners of the legal entity,
- (b) proof of permanent residence or other lawful residence (e.g. a duly issued invoice for energy supply, or a bank account statement with identification details and a consenting address, an extract from the Population Register, an extract from the Commercial Register or equivalent,
- (c) a photograph of your likeness together with clearly legible details of your identity document,
- d) information about the origin of the funds to be deposited under the contract you enter into with our company. For these purposes, we may also use certain information from public registers or other publicly available sources for the purposes of verifying your identity, assessing business risk, screening for potential fraudulent activity, so-called money laundering or other criminal offences.

3.6 Unless you give us your explicit consent, we will never disclose your personal data to a third party. Use of personal data We may only use your personal data on the following legal bases:

(a) Performance of a contract

- 3.7 We process your personal data if it is necessary for the conclusion, performance, modification or termination of a contract. In this respect, we process your name, surname, address and your bank account or virtual crypto wallet account details. The conclusion and performance of the Contract is only possible after the opening of your Account and therefore we also process your e-mail address (your login name) and the password for your Account. The duration of the processing of your personal data is determined by the duration of the contract.
- 3.8 We process your personal data if it is necessary for the fulfilment of our legal obligations. We process your personal data for the purpose of our compliance with applicable law and in particular in the area of AML. In this context, we may ask you to upload a copy of your identification document (passport or ID card) and to fill in the relevant identification data or provide other information in accordance with the contract.
- 3.9 We may further disclose your personal data only if it is necessary to comply with a legal obligation or a decision of a court or other public authority. The duration of the processing of your personal data is determined by the duration of the specific legal obligation.
- 3.10 We may also process your personal data where it is necessary for the purposes of our legitimate interests, except where those interests are overridden by your interests or fundamental rights and freedoms. Our legitimate interests include the following:
- (a) Protecting our rights:

We may retain your personal data where it is necessary to protect our rights under this agreement or applicable law. We will only keep this personal data about you for the necessary period of time, which will not exceed 5 years from the end of this contract.

b) Prevention of fraudulent behaviour:

We may retain your personal data where necessary for the purpose of preventing fraudulent conduct that may cause damage to us and harm our interests, for a period of 5 years after the end of the contract.

c) Recovery of claims

We will retain your personal data where necessary to enforce claims we may have against you. We retain personal data until the relevant limitation period has expired.

d) Direct Marketing:

We use your name and email address to provide you with information about our products and services. Unless you have objected to this, or object at any time in the future, we will send you an email newsletter in order to provide you with this information.

4. Use of Cookies

- 4.1 We use "cookies" to help personalise your use of the CoinWatt website. A cookie is a text file that is placed on your hard drive by a web server. The cookie is assigned solely to you, and can only be read by the domain of the web server that issued the cookie to you. One of the main purposes of cookies is to provide appropriate functionality to save you time. The purpose of cookies is to tell the web server that you have returned to a particular page.
- 4.2 Our website uses Google Analytics, a web analytics service provided by Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter referred to as "Google"). Google Analytics uses cookies. In this case, we process your data on the basis of our legitimate interest in order to create easy-to-use statistics about your visit to our website in a cost-effective manner. Thus, the data collected via cookies about your use of our website (including the IP address and URL of the website visited) is transmitted to Google servers in the USA and stored there. We will not store any of your data collected in connection with Google Analytics. This website makes use of the IP address anonymisation option provided by Google Analytics. Your IP address will therefore be truncated/anonymised by Google as soon as it is received by Google. Google will use this data on our behalf to evaluate your use of the website, compile reports on website activity and provide other services relating to website activity and internet usage. You can generally prevent the collection of user data on our website by setting the "Do not Track" option in your web browser. Our website takes into account the "Do Not Track" signal that your web browser sends to all websites. You can thus prevent the collection of user data by Google Analytics in general on all websites by downloading the browser add-on available at the following link and installing it. https://tools.google.com/dlpage/gaoptout?hl
- 4.3 You have the option in your web browser to refuse cookies. However, if you refuse cookies, you may not be able to use the full functionality of the CointWatt website.
- 4.4 If you consent to marketing cookies based on your previous shopping or search preferences automated decision making occurs in that you may be presented with a pop-up window that will display advertisements based on its previous shopping or search preferences.
- 4.5 The information stored in our Platform's cookies is used solely by us, except for "Third Party Cookies" which are used and managed by external companies to provide us with services designed to improve our own services and the user experience when browsing our Platform.
- 5. Rights of the data subject/visitor/user
- a) The right to request access to personal data relating to the visitor/user of the service,

As a visitor/user of the service, you have the right to be provided with a list of the personal data we hold from you as well as information about how we process your data.

b) Right to rectification of personal data

We have taken measures to keep your personal data accurate, complete and up to date. If you believe that the personal data we hold about you is not accurate, complete and up to date, please let us know.

c) Right to erasure of personal data

As a visitor/user of the service, you may also ask us to erase your personal data if the grounds for doing so are met by law, e.g. if the purpose of the processing has ceased.

d) Right to restriction of processing of personal data

As a visitor/user of the service, you can ask us to stop using your personal data if the legal conditions are met, e.g. if you believe that the personal data we hold about you is inaccurate, etc.

e) Right to object to the processing of personal data

As a visitor/user of the Service, you have the right to object to the processing of your data where you have acquired the belief that we do not have a lawful basis for processing your personal data; e.g. where our legitimate interests in processing your personal data do not outweigh the rights or interests of the visitor/user of the Service.

f) Right to portability of personal data

As a visitor/user of the Service, you have the right in certain circumstances to ask us to transfer the personal data you have provided to us. However, this right of portability only applies to personal data that we have provided to us on the basis of your consent or on the basis of a contract to which you are a party.

g) Right to withdraw consent

As a visitor/user of the Service, you have the right to withdraw your consent at any time where we process your personal data on the basis of your consent. h) The right to lodge a complaint with a supervisory authority As a visitor/user of the Service, you have the right to file a petition or complaint with the Office for Personal Data Protection of the Slovak Republic, https://dataprotection.gov.sk , Hraničná 12, 820 07 Bratislava 27; tel. number: +421 /2/ 3231 3214; E-mail: statny.dozor@pdp.gov.sk The visitor/user of the service may request the exercise of the above rights at any time, by email:, telephone number, or in writing to the postal address of the Operator's registered office. The Operator shall process the visitor's/service user's request in relation to the aforementioned rights within the statutory time limits. 6. Changes to the privacy policy Setting up processes for the purpose of privacy protection is an ongoing process that needs to be updated and adapted from time to time. The information that we are required to provide to you under the GDPR regarding the processing of your personal data is subject to change. For this reason, we reserve the right to modify and change these terms and conditions to any extent at any time. In the event that these terms and conditions change in a material way, we will bring this change to your attention, for example, by a general notice on this website or by a separate notice via email. 7. Identification and contact details of the controller:

Business name: CoinWatt, Inc.

Registered office: Ľ. Fullu 9/A, 841 05 Bratislava - Karlova Ves district, Slovak Republic

ICKO: 54 799 724

7.1 Controller:

Legal form: joint-stock company

Registered: Commercial Register of the District Court Bratislava I, Section: Sa, Insert: 7463/B

contact details: email: [-] tel.: [-]

7.2 Contact details of the responsible person:

Responsible person: dr. Fiorenzo Coppola Bove