

GO-FUND'S PRIVACY AND COOKIES POLICY

Version 1-2-0

The herein Private and Cookies Policy is issued by "GO-FUND GROUP LTD", a limited liability company registered in the Republic of Cyprus, "GO-FUND MANAGEMENT & FINANCING LTD" in 40 Vyzantiou Street, Office 101, 2064 Nicosia, Cyprus, and their related and affiliated entities. When we mention "We", "Us", "Our" or "GO-FUND" in this Privacy Policy, we refer to the abovementioned companies responsible for processing your data.

According to the provisions of 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 (hereinafter referred to as the "GDPR"), we encourage you to carefully read the terms set out in this document. It contains important information that must be taken into account before using our services and our Website. Using our services and our Website or clicking the "Register" button in the website entails the acceptance of this Privacy and Cookies Policy (hereinafter referred to as the "Policy") as established in Art. 4(11) GDPR. In consequence, we shall be authorized to collect, to process and to transfer your personal data according to the terms established in this Policy. GO-FUND's Website is not intended for children and we do not intend to collect or process data relating to children. Otherwise, if GO-FUND unintentionally process data relating to children, then such personal data shall be processed according to the terms established in this Policy.

1. POLICY'S PURPOSE

The purpose of this Policy is to provide accurate information regarding the protection of your personal data. By means of the terms stated in this Policy, your personal data shall be collected, processed and transferred in a lawful, controlled and informed manner, as well as the mechanisms for exercising your rights, including any dispute concerning privacy under the GDPR and in accordance with the data protection laws which are applicable to GO-FUND (hereinafter referred to as "GO-FUND", "Us", "We", "Our"). In case that you do not agree with this Policy, please refrain from using Our services and Website.



2. GLOSSARY

For the purpose of the interpretation of this Policy the following definitions are applicable:

1. *Personal data.* Means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. *Processing.* Means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3. *Controller.* Means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; in this case, Us;
4. *Processor.* Means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
5. *Cross-border processing.* Means either: (a) processing of personal data which takes place in the context of the activities of establishments in more than one European Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or (b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.
6. *Third Party.* Means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are

authorized to process personal data. In this particular case either (a) Internal Third Parties: Other companies in the GO-FUND company group acting as joint controllers or processors and who are based in the Republic of Cyprus and Austria. (b) External Third Parties: Service providers who render IT and system administration services; email and fraud verification service providers. Professional advisers, including lawyers, auditors and insurers based in other European Member States who provide consultancy, banking, legal, insurance and accounting services.

7. *External Third Party's links and websites.* Our website may include links to third-party websites. Clicking on those links or enabling connections to them may allow third parties to collect or share data about you. We do not control External Third-Party websites and are not responsible for their privacy policies.

3. PERSONAL DATA COLLECTED

Personal Data we collect about you:

- a) Personal information: your first name(s), middle name, surname, title, photograph, nationality, date of birth, gender, relationship to a person, position, role, company or organization, employer, copy of passport or national identity, utility provider details, bank statements;
- b) Contact information: telephone number(s) (including mobile phone number(s) where provided), fax numbers as well as email and postal/residential address;
- c) Financial information: payment related information and financial information required for anti-money laundering or compliance purposes;
- d) Business information: data identifying you in relation to matters on which you instruct us or in which you are involved;
- e) Payment details: billing address, payment method, bank account number, accountholder name, account security details, invoice records, payment



- records, SWIFT details, IBAN details, payment amount, payment date, records of cheques;
- f) Identification and background information provided by you or collected by us as part of our business acceptance processes, anti-money laundering and compliance obligations;
 - g) Information from publicly available sources and screening providers: e.g. sanctions lists;
 - h) Information in connection with investigations or proceedings: where this is necessary to provide our services to you;
 - i) Personal information provided to us by or on behalf of our clients and partners or generated by us in the course of providing services, which may include special categories of data. Special category data in the EU refers to sensitive data such as your racial or ethnic origin, religious beliefs or health data;
 - j) Preferences: when you give your consent to receive newsletters, legal updates or other communications from us;
 - k) Consent records: records of any consents you may have given us, together with the date, means of consent and any related information (e.g. the subject matter of the consent);
 - l) Supplier data: contact details and other information about you or your company or organization where you provide services to us;
 - m) Criminal record data: where permitted by national law and appropriate to do so, such as existence of prior criminal offences (or confirmation of clean criminal record); and
 - n) Any other information relating to you which you may provide to us, for example health personal data, if required by us in order to be able to provide legal and other services to you e.g. to defend you in legal proceedings against you.

We shall collect, use, store, process and transfer your personal data in different situations while using Our services and Website, as follows:

1. BY REGISTERING ON THE WEBSITE.

You have the possibility to register in GO-FUND's Website. In this case, the personal data collected includes name, family name, e-mail, address, phone number, date of birth, copy of your identification, social media profile, financial details, information about your risk profile, investments. Your Internet Protocol address, date and time of your registration, browser type and version are, as well, collected by Us. We, also, collect server log information, including but is not limited to your login details, the date and time of the visits to our Website, the pages viewed, your IP address, time spent at our Website and the websites you visit just before and just after our Website. Furthermore, we collect information about the computer or mobile device you use to access our Website, including the hardware model, operating system and version, the web browser you use, and other device identifiers. The foregoing are collected for the purposes of rendering and optimizing Our services, for preventing the misuse or abuse of Our Website and services and, when necessary, to investigate and prosecute offenses and to comply with the applicable laws.

Personal data included in your registration shall enable GO-FUND to offer you services that may only be offered to registered users. You are entitled to complete or modify the personal data given in your registration provided that the new data is accurate and corresponds to you. The abovementioned information shall be processed by Us to use data analytics in order to improve our Website and services.

2. BY RECEIVING OUR SERVICES.

The following personal data is processed for services purposes: name, home or business address, e-mail, username, password, Internet Protocol address, browser type and version, bank account numbers, bank statement, private or public cryptographic key relating to addresses on distributed ledger networks, trading information, passport (if applicable) and national identification card.

3. BY JOINING OUR TELEGRAM, FACEBOOK, TWITTER AND/OR YOUTUBE INFO CHANNEL.

On Our Website, you are able to subscribe to our Info Channel provided by Telegram Messenger LLP, 71-75 Shelton Street, Covent Garden, London, United

Kingdom (hereinafter referred to as “Telegram”), Facebook Inc, 1601 Willow Road, Menlo Park, California, USA (hereinafter referred to as “Facebook”), Twitter Inc, 1355 Market St #900, San Francisco, CA 94103, USA, (hereinafter referred to as “Twitter”), and/or YouTube, LLC, 901 Cherry Ave. San Bruno, CA 94066, USA (hereinafter referred to as “Youtube”). By accessing to Telegram, Facebook, Twitter and/or Youtube, your browser will communicate with the servers of Telegram, Facebook, Twitter and/or Youtube. In consequence, personal data will be transferred and stored thereto. If you are logged in Telegram, Facebook, Twitter and/or Youtube, your IP address and your visit to Our Website may be associated to your account. In order to avoid the allocation of the collected data to your account, you shall log out from your Telegram Facebook, Twitter and/or Youtube account before visiting our Website. Please visit Telegram’s, Facebook’s, Twitter’s and/or Youtube’s Privacy Policy for more information.

4. BY CONTACTING US THROUGH OUR WEBSITE.

Electronic contact via Our formulary is available in GO-FUND’s Website. Alternatively, you can contact us by e-mail or by phone. In these cases, we will collect your name, username, password, e-mail address, cryptocurrency address, mailing address, and phone number. This data is automatically stored for the purpose of establishing contact with you, to answer inquiries of Our services or to provide information in general; as well, for the purposes of monitoring Our services.

We shall store and process the foregoing personal data in order to notify you about changes to our terms or this Policy.

5. THIRD PARTIES OR PUBLICLY AVAILABLE SOURCES.

We may receive personal data about you from various third parties and public sources, provided that the processing activities of such third parties are lawful. GO-FUND will process your personal data as established in the applicable laws. Moreover, GO-FUND will process your personal data when it is necessary for complying with a legal obligation.

In case of failure to provide personal data when it is necessary, either by law or under the terms of the contractual relationship between you and GO-FUND, We may not be able to render Our services or comply with the corresponding contract. Therefore, the service will be canceled after the notification granted to you.



4. DATA CONTROLLER'S AND PROTECTION OFFICER'S DETAILS

GO-FUND Group Ltd and GO-FUND Management and Financing Ltd are the controllers and responsible for your personal data. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact Us using the details set out below:

Full name of legal entity: GO-FUND Management and Financing Ltd.

Company number: HE391405

Registered office address: 40 Vyzantiou Street, Office 101, 2064 Nicosia, Cyprus

E-mail address: office@go-fund-ico.com

GO-FUND takes seriously the protection of your personal data. If you have concerns about the way GO-FUND is handling your personal data, please let us know immediately. You may message us to the e-mail address established above.

We address your concerns with attention within 45 (forty five) days at the latest.

Your inquiry must include the description of the inconformity or non-compliance with data protection laws. We will investigate your inquiry as soon as possible. You may also contact our Data Protection Officer directly:

Address: 40 Vyzantiou Street, Office 101, 2064 Nicosia, Cyprus

E-mail address: office@go-fund-ico.com

5. DISCLOSURE OF INFORMATION

GO-FUND undertakes to store your personal data with high level of legal, technological and administrative security. As well, GO-FUND shall not sell, rent or share your personal information with third parties for illicit purposes.

For the purposes stated in this Policy and for complying with our obligations derived from Our services, We may disclose your personal data with Third Parties (as such concept is defined in numeral VI of this Policy's Glossary). Therefore, we will disclose your information:

- a) To affiliate and subsidiary companies of GO-FUND;
- b) To service providers, in order to comply with Our legal obligations;
- c) To service providers which perform investigation, data analysis or marketing services on Our behalf. Third Parties that render customer identification and anti-fraud control services may retain and use your personal data on Our behalf;
- d) To outsourced Third Parties, in order to render our services;

- e) For Our business purposes;
- f) Other disclosure of your information in case that we are under a duty to make such disclosure in order to comply with the applicable laws.

Moreover, your information shall be shared with Third Parties in the case we sell, transfer, or merge parts or whole of our business or our assets. In that case, the new entity may use your personal data in the same way as set out in this Policy. We require all Third Parties to process your personal data in accordance with the applicable laws. Third Parties take the same responsibilities as GO-FUND as established in this Policy. Any person who requests information or who establishes a legal relation with Us, consents to the disclosure of his/her personal data as described in this Policy.

We may transfer your personal data to Third Parties and authorities outside of the European Economic Area (EEA). Such Third Parties may be involved, amongst other things, in the fulfillment of your request regarding Our services, the processing of your payment and for the provision of the support services. We ensure your personal data will be treated securely by requiring all Our affiliates and subsidiaries to process your personal data in accordance with this Policy.

We will use strict security procedures to prevent unauthorized access to your personal data. Therefore, every time we transfer your personal data outside of the EEA, we shall ensure similar protection as the one described in this Policy.

6. ERASURE OF PERSONAL DATA AND OTHER RIGHTS

The time period for the processing of your personal data will be the strictly necessary for the fulfillment of the abovementioned purposes, included those to satisfy any legal, supervisory or accounting obligations. In determining the optimal retention period of your personal data We shall take into account the nature of your personal data, the risk of harm of unauthorized use of it, the purposes for which your data was collected and processed and the requirements established in the applicable laws.

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.

According to Articles 15 to 18, 20 and 21 of the GDPR, you may exercise your rights by contacting GO-FUND directly to the address, phone number or e-mail mentioned above, in order to:



- a) Obtain from Us a confirmation whether or not we process personal data concerning you. You are entitled to request access to your personal data which is processed by GO-FUND; therefore, you shall obtain a confirmation containing:
- b) Obtain from Us the purposes of the processing;
- c) Obtain from Us the categories of the personal data concerned;
- d) Obtain from Us the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations. You shall have the right to be informed about the appropriate measures relating to the data transfer;
- e) Obtain from Us, where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period, where possible;
- f) Exercise your right to request from Us the rectification or erasure of your personal data or restriction of processing of your personal data or to object to such processing;
- g) Exercise the right to lodge a complaint with a supervisory authority;
- h) Obtain from Us, any available information, in case that your personal data is not collected from Us, as to their source;
- i) Obtain from Us the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you;
- j) Request correction or deletion of your personal data when the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, and in other cases as established in Art. 17 GDPR. 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;
- k) Request that We restrict the processing of your personal data in cases when the accuracy of the personal data is contested by you, for a period

enabling GO-FUND to verify the accuracy of the personal data, and in other cases as established in Art. 18 GDPR;

- l) Receive the personal data concerning you, which was given to GO-FUND in a structured, commonly used and machine-readable format. Moreover, you have the right to transmit those data to another controller without hindrance from GO-FUND to which the personal data have been provided, in those cases established in Art. 20 GDPR;
- m) Object to the processing of your personal data, according to Art. 21 GDPR; and
- n) Withdraw your consent to the process of your personal data in the case that GO-FUND requires such consent. 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 services to you.

You have the right to ask Us not to process your personal data for marketing purposes by sending us an e-mail to office@go-fund-ico.com. GO-FUND will take all reasonable steps in order to process your request in line with the applicable laws; however, in case of disagreement with Our answer, you have the right to lodge a complaint with the competent data protection authority (“DPA”) according to Art. 77 GDPR.

7. DATA SECURITY

We use only high quality safeguards to protect your personal data from loss, use or access in an unauthorized manner, altered, disclosed or misused. In any case, the transmission of information through the Internet and /or any other public accessible network is not completely secure; hence, We cannot assure the security of your data beyond our strict procedures and security features. GO-FUND is not liable for the security of your data transmitted over the Internet or through a third party's content.

8. HYPERLINKS AND THIRD-PARTY SITES

Our Website may contain links to other third party websites that may collect personal information about you, including through cookies or other technologies.

If you link to another website, you will exit our Website and this Policy shall cease to apply. It is clearly stated that it is your responsibility to consult the foregoing third party websites' relevant privacy policies, bearing in mind that GO-FUND has no control over them and is not responsible for any information that is submitted to or collected by these third parties.

9. MODIFICATIONS

GO-FUND has the right to review, modify, supplement or update this Policy at any time, at its sole discretion. Any change to this Policy shall be notified in writing to your e-mail or by public or private publications made by GO-FUND. It is your obligation to periodically visit our Website to review any changes that may be made to this Privacy Policy. If you don't agree with the changes to this Policy you must stop using this Website given that your continued use shall constitute your agreement to be bound by any such changes to this Policy. In case you do not agree with this Policy, you are not authorized to use our Website and your sole recourse is to not use our Website.

10. COOKIES POLICY AND OTHER TRACKING TECHNOLOGIES

Please bear in mind that this Website uses Cookies to collect information when you use our Website, including Cookies and Web Beacons. Web beacons are graphic images that are placed on a website or in an email that is used to monitor the behavior of the user visiting the website or sending the email. They are often used in combination with Cookies. Cookies refer to text files containing basic information which are downloaded to your personal computer, mobile or other device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that Cookies. Cookies are useful because they allow a website to recognize a user's device. Therefore, we use Cookies in order to provide a better service, to analyze the usage of our Website, to enable us to customize the Website to your preferences, to understand our users for marketing and analytics purposes, to improve navigation, and to collect aggregate information, and particularly:

- a) Essential Cookies. In such instances, Cookies allow you to use Our Website and its features. These cookies enable to maintain secure user sessions.



- b) Functional Cookies. In such cases, Cookies enable the Website to remember your preferences.
- c) Performance Cookies. Cookies collect information about how visitors use our Website in order to improve the functionality of Our Website. In these cases, information collected is anonymous.

You can 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. For more information about blocking and deleting Cookies, please visit the following links:

Internet Explorer

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

Google Chrome

<https://support.google.com/chrome/answer/95647?hl=en>

Safari

<https://support.apple.com/kb/PH21411>

Edge

<https://www.thewindowsclub.com/allow-or-block-cookies-in-microsoft-edge>

Firefox

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>