

# Privacy and Cookie Policy

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Last Updated: 01.Aug.2024

Cidrus SP Z O.O. ("we," "our," or "us") is committed to protecting and respecting your privacy. This Privacy and Cookie Policy ("Policy") explains how we collect, use, disclose, and safeguard your information when you visit our cryptocurrency exchange, Xdeel ("Service" or "Platform"). It also explains our use of cookies and similar technologies. Please read this Policy carefully to understand our practices regarding your personal data and how we use cookies.

By using Xdeel, you agree to the collection, use, and sharing of your information and cookies as described in this Policy.

## 1. Data Controller

The data controller responsible for your personal data is:

Cidrus SP Z O.O.

Address: Wierzbowa 21, Łódź 90-227, Poland

Contact Email: legal@xdeel.com

Phone Number: +48 66 224 8895

## 2. Information We Collect

### a. Information You Provide

We may collect the following types of personal information when you use our Platform:

- Identification Information: Name, date of birth, gender, nationality, and government-issued identification details (e.g., passport, national ID, driver's license).
- Contact Information: Email address, phone number, and postal address.
- Account Information: Username, password, and security questions and answers.
- Financial Information: Bank account details, credit card information, and transaction history.
- Verification Information: Photographs, video selfies, and any documents submitted for identity verification.

### b. Information Collected Automatically

When you use our Platform, we automatically collect certain information:

- Technical Information: IP address, browser type and version, time zone setting, browser

plug-in types and versions, operating system, and platform.

- Usage Data: Information about how you use our Platform, including transaction details, interaction with customer support, and access times.
- Cookies and Tracking Technologies: We use cookies, beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

### **c. Information from Third Parties**

We may receive information about you from third parties, including:

- Identity Verification Services: Information used to verify your identity and prevent fraud.
- Partners and Affiliates: Information from our business partners that help us provide our services.

## **3. How We Use Your Information**

We use the information we collect for the following purposes:

- To Provide and Improve Our Services: To operate, maintain, and improve our Platform and services.
- To Process Transactions: To process payments and other transactions related to your use of our Platform.
- To Comply with Legal Obligations: To comply with applicable laws, regulations, and legal processes, including anti-money laundering (AML) and know your customer (KYC) requirements.
- To Communicate with You: To send you updates, promotional materials, and information about our services, or to respond to your inquiries.
- To Enhance Security: To protect the safety and security of our users, Platform, and infrastructure.
- For Analytics: To monitor and analyze usage and trends to improve the user experience.

## **4. Legal Basis for Processing Your Information**

We process your personal data based on the following legal grounds:

- Performance of a Contract: When processing is necessary to fulfill a contract with you or to take steps at your request before entering into a contract.
- Legal Obligations: When processing is necessary for compliance with a legal obligation to which we are subject.
- Legitimate Interests: When processing is necessary for our legitimate interests, provided that your rights do not override those interests.
- Consent: Where you have provided your explicit consent to process your personal data for specific purposes.

## 5. Data Sharing and Disclosure

We do not sell, trade, or rent your personal data. However, we may share your data with:

- Service Providers: Third-party vendors who provide services such as payment processing, identity verification, and IT support.
- Regulatory Authorities: When required by law, we may disclose your information to government or regulatory authorities.
- Business Transfers: In the event of a merger, acquisition, or sale of assets, your personal data may be transferred to a third party.
- Legal Obligations: To comply with legal obligations, including responding to lawful requests and court orders.

## 6. International Data Transfers

Your personal data may be transferred to and processed in countries outside the European Economic Area (EEA). We ensure that such transfers are protected by appropriate safeguards, such as the EU Standard Contractual Clauses or other lawful mechanisms.

## 7. Data Security

We implement a variety of security measures to protect your personal data, including encryption, access controls, and regular security assessments. However, no system is completely secure, and we cannot guarantee the absolute security of your data.

## 8. Data Retention

We will retain your personal data for as long as necessary to fulfill the purposes for which it was collected, including compliance with legal, accounting, or reporting requirements. When your data is no longer needed, we will securely delete or anonymize it.

## 9. Your Rights

Under the General Data Protection Regulation (GDPR) and other applicable data protection laws, you have the following rights:

- Right to Access: You have the right to request a copy of your personal data.
- Right to Rectification: You have the right to request correction of any inaccurate or incomplete data.
- Right to Erasure: You have the right to request deletion of your personal data, subject to certain legal exceptions.
- Right to Restrict Processing: You have the right to request a restriction on the processing of your data.
- Right to Data Portability: You have the right to request the transfer of your data to another

organization or directly to you.

- Right to Object: You have the right to object to the processing of your data based on legitimate interests, direct marketing, or other grounds.
- Right to Withdraw Consent: You may withdraw your consent at any time, where consent is the basis for processing.

## 10. Cookies and Similar Technologies

### a. What Are Cookies?

Cookies are small text files that are placed on your device (computer, tablet, smartphone) by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the website owners.

### b. Types of Cookies We Use

- Essential Cookies: These cookies are necessary for the operation of our Platform. They enable you to navigate the site and use its features, such as accessing secure areas of the site.
- Analytical/Performance Cookies: These cookies allow us to recognize and count the number of visitors and to see how visitors move around our Platform when they are using it. This helps us to improve the way our Platform works, for example, by ensuring that users find what they are looking for easily.
- Functionality Cookies: These cookies are used to recognize you when you return to our Platform. They enable us to personalize our content for you, greet you by name, and remember your preferences (for example, your choice of language or region).
- Targeting/Advertising Cookies: These cookies record your visit to our Platform, the pages you have visited, and the links you have followed. We use this information to make our Platform and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

### c. Third-Party Cookies

In addition to our own cookies, we may also use various third-party cookies to report usage statistics of the Platform, deliver advertisements, and so on. These third-party cookies are set by external companies that provide services such as analytics or advertising.

### d. How We Use Cookies

We use cookies to:

- Ensure the proper functioning of our Platform.
- Enhance the security and functionality of our services.
- Understand and analyze how you use our Platform, which helps us improve user experience.
- Provide you with personalized content and advertisements tailored to your interests.
- Remember your preferences and login details for future visits.

## e. Your Choices Regarding Cookies

You have several options for managing cookies on your device:

- **Browser Settings:** You can control and manage cookies through your web browser settings. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Please note that disabling cookies may affect the functionality of our Platform.

For more information on how to manage cookies in your browser, please visit your browser's help page:

- [Google Chrome](https://support.google.com/chrome/answer/95647?hl=en)
- [Mozilla Firefox](https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer)
- [Safari](https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac)
- [Microsoft Edge](https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09)
- [Opera](https://help.opera.com/en/latest/web-preferences/#cookies)

- **Opting Out of Targeted Advertising:** You can opt out of targeted advertising from various third-party companies by visiting the Digital Advertising Alliance's opt-out page at [http://www.aboutads.info/choices/](http://www.aboutads.info/choices/) or the Network Advertising Initiative's opt-out page at [http://www.networkadvertising.org/choices/](http://www.networkadvertising.org/choices/).

- **Cookie Consent Management Tools:** On our Platform, we may offer a cookie consent tool that allows you to manage your cookie preferences directly.

## 11. Changes to This Policy

We may update this Privacy and Cookie Policy from time to time to reflect changes in our practices or legal requirements. Any updates will be posted on this page with a revised "Last Updated" date.

## 12. Contact Us

If you have any questions or concerns about this Privacy and Cookie Policy, please contact us at:

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Website: [Xdeel.com](<https://www.xdeel.com>)