

# Privacy Policy

This Privacy Policy (this "Policy") applies to the platform (including any applicable websites and interfaces used to access it, collectively the "Platform") provided by MARKET-UP (the "Company") and is an integral additional agreement to the Terms of Use. It describes how the Company collects, uses and discloses Personal Information that the Company receives from Users of the Platform and any Account Services provided through the Platform.

## 1. General Provisions

1.1 For the purposes of this Policy, "Personal Information" refers to information provided by the User that helps identify the User and/or establish identity of the User, directly or indirectly.

1.2 By registering on and using the Platform, the User agrees that their Personal Information will be processed as described in this Policy, as well as in the Terms of Use applicable to the Platform (the "Terms of Use"); capitalized terms used herein will have the same meaning as in the Terms of Use.

1.3 The Company collects and processes Personal Information about the User directly from the User when the User signs in to use the Platform or provides such information; data is being also collected automatically when using the Platform.

1.4 The purpose of this Policy is to provide the User with information about the purposes of collecting and processing Personal Information, the legality of the basis, the amount of processing, protection and processing time of Personal Information at the time of obtaining such information, and during the processing of the User's Personal Information.

## 2. Information that the Company collects directly from the User.

2.1 Personal account and profile Information:

- E-mail address, User's name, and any other Personal information that the User provides to the Company when communicating. Such data is used only for communication with the User.
- User's names and address, passport copy that User provides us when ordering our commercial products.

2.2 Financial details:

- Crypto wallet addresses, transaction and balance data available when interacting with the Platform.
- Public blockchain addresses and blockchain data. The Company uses publicly available Blockchain addresses to determine the path of the User to the Services and the Company's product. The Company groups and analyzes these User paths collectively to improve the user experience. The Company does not use this data for any purpose at the level of individual Users; such information helps only to comply with the legitimate interests of the Company, such as monitoring and improving the Platform and protecting the Platform from risks. The Company is not responsible for the User using any block chain and User data processed in these decentralized networks without permission.

2.3 Other relevant information:

- The Company may need to collect certain additional information in order to comply with legal requirements, for example, whether the User is on any list of persons with limited access.

2.4 Communication with the Company:

- The Company collects information that the User provides during any support messages and feedback by e-mail or when the User contacts the Company through the contact forms on the Platform. The Company uses this information to respond to Users' requests, provide support, facilitate transactions and improve the Platform.

2.5 If a User acts as an Authorized Individual on behalf of the User and provides Personal Information for such User, they are responsible for ensuring that the User has all the necessary permissions and consents to provide such Personal Information to the Company for use in connection with the Platform and that by using such Personal Information the Company does not violate any applicable law, rule, regulation or order.

## 3. Information collected automatically by the Company.

3.1 When the User uses the Platform, the Company's servers automatically record information using cookies and other tracking technologies, including information that the User's browser sends each time when visiting and using the Platform. This log data may include the address of the User's Internet protocol,

the address of the web page that the User visited before accessing the Platform, the type and settings of the User's browser, the date and time of the request, information about the browser configuration and plug-ins, language preferences and cookie data. Such log data is usually not deleted.

3.2 In addition to log data, the Company may also collect any information about the device that the User uses for accessing the Platform, including the type of device, the operating system used, device settings, unique device identifiers and crash data.

3.3 The Company may combine this information with other collected information, including, where applicable, the User's name, email address and other Personal Information.

#### **4. How the Company uses the User's information.**

4.1 The Company uses the User's information, including Personal Information, for the following purposes:

- To provide the Platform to the User, to facilitate communications and transactions on the Platform, to communicate with the User about them using the Platform, to respond to User requests, to fulfill the User's orders and for other customer service purposes.
- To adapt the content and information that the Company may send or display to the User, offer personalized assistance and instructions, and otherwise personalize the user experience when using the Platform.
- To better understand how Users access and use the Platform, both on an aggregated and individual basis, in order to improve the Platform and respond to the wishes and preferences of Users, as well as for other research and analytical purposes;
- For marketing and advertising purposes. For example, the Company may use information such as the User's email address to send news and newsletters, to notify about special offers and promotions, to run sweepstakes and contests, or to otherwise contact the User about the Services, products or information. The Company may also use the collected information to customize the Platform's advertisements on third-party websites.

#### **5. How we share user information.**

5.1 The Company may transfer User information, including Personal Information, to:

- affiliates or subsidiaries solely for the purpose of providing the Platform; however, if the Company does so, the use and disclosure of the User's Personal Information will be supported by such affiliates and subsidiaries in accordance with this Policy;
- third party suppliers, service providers, contractors or agents who perform functions on behalf of the Company, provided that such third parties have agreed to use such information only to provide services;
- if the Company is negotiating with another company or organization, or the Company is acquired or merged with another company or organization, or if substantially all of the assets of the Company are transferred to another company or organization, or under bankruptcy proceedings.
- pursuant to a law, court proceeding, court order, or other legal process, such as in response to a subpoena.
- if the Company believes that it is necessary to investigate, prevent or take action in relation to illegal activity, suspicion of fraud, situations related to potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in legal proceedings, in to which the Company is involved.
- The company may collect, process, analyze and provide aggregate or anonymized information about users to third parties and publicly for product development, marketing, advertising, research or similar purposes.
- The company uses cookies and other tracking mechanisms.

5.2 The Company and third-party service providers use cookies and other tracking mechanisms to track information about the Users' using the Platform. The Company may combine this information with other Personal Information that it collects from Users (and the Company's third-party service providers may do this on its behalf).

#### **6. Profiling and automated decision making**

6.1 Profiling is the automated processing of Personal Information, which manifests itself as the use of Personal Information in order to evaluate certain related personal aspects with the User, in particular, to analyze or predict moments related to personal preferences, interests, behavior or location of the User.

6.2. The Company carries out profiling pursuing its legal interests based on personal offers and marketing, as well as accrues rewards to the User for participating in the Partner Program. The Company provides Users with the opportunity to choose and use convenient tools to manage their privacy settings.

6.3. The Company can carry out automated decision making for the User. The User must be informed about such activities performed by the Company additionally in accordance with the Terms of Use.

6.4. The adoption of automated decisions that create legal consequences for the User can only take place during the conclusion or execution of the Agreement between the Company and the User or on the basis of the User's full acceptance of the terms of the Agreement.

## 7. **Cookie.**

7.1 Cookies are alphanumeric identifiers that the Company transfers to the hard drive of a computer, tablet, smartphone, or other devices that the User uses to visit the website through a web browser for record-keeping purposes. Some cookies allow the Company to make it easier for the User to navigate the Platform, while others are used to speed up the login process or to track the User's actions on the Platform. Cookies are widely used by website owners to make websites function or to improve their performance, as well as to obtain analytical information.

7.2 The website <https://market-up.co> uses its own and third-party cookies and similar technologies to store information on the User's computer. The purpose of this is to guarantee the most comfortable user experience by providing personalized information, remembering preferences in the marketing field, in services and products, as well as helping to obtain the correct information. By continuing to use the Platform, the User consent to the use and placement of cookies.

7.3 The company and service providers may use different types of cookies on the Website:

- **Strictly necessary cookies.** Cookies in this category are necessary in order to enable users to move around the Website and use its functions, such as access to secure areas of the Platform.
- **Cookies created for improving the Website's performance.** Cookies of this category collect information about the use of the Website by visitors, such as, which pages visitors view most often, and whether Website visitors see error messages on the web pages. These cookies do not collect information that directly identifies a visitor. All information collected by these cookies is combined; thus, it remains anonymous. This information is only used for improving the Website's performance. Cookies of the second category collect information about the use of the Website only in the interests of the Website operator. By using the Website, the User consent to the placement of cookies on their devices.
- **Functional cookies.** Cookies of this category allow the Website to remember the answer options submitted by the User (for example, the User's name, language, or region in which he/she is located) and provide advanced features according to Users' individual tastes or needs. For example, the Website can provide the User with information about the services and products offered in a particular city or region, storing a particular region where the User is currently located in a cookie. These cookies can be used to remember the changes made by the User regarding the size of the text, the fonts used, and other customizable parameters of the web pages. They can also be used to provide services requested by the User, such as watching videos or commenting on blogs. The information collected by these cookies can be anonymous and these cookies are not able to track the User's activity on other websites. By using the Platform to customize personal settings, the User agrees that the Company may place such cookies that are used to remember preferences on their device.
- **Targeting or advertising cookies.** Cookies in this category are used for displaying advertisements that are most relevant to the needs and interests of the User, based on the analysis of the User's movements in the network. They are also used to limit the number of times an ad is shown and to help the Company measure the effectiveness of an ad campaign. They are usually placed on the User's device by third-party advertising networks, but with the permission of the Company. These cookies remember the User's visit to our website. This information is shared with other organizations, such as third-party advertisers, and will be linked to features of the Website provided by other organizations. In other words, cookies in this category collect the most information about users.

7.4 The company and service providers may use cookies for a variety of purposes, including:

- in order for the company's systems to uniquely identify the User during a session or when logging into the Platform. This allows the Company to process the User's online transactions, orders and requests and verify his identity after the User is logged in when navigating the Platform.
- to facilitate obtaining information about the User's visits to the Website.
- to analyze information about the User's visit to pages to improve our Website.
- to provide advertisements, messages, and content created by the Company and third parties on this Website and other websites, respecting interests of the User.
- to help the User in obtaining the necessary information.
- to determine the number of visitors and how they use our website to improve its performance and to better understand what is interesting to the audience.
- to track aggregate and statistical information about the activity of Users.

#### 7.5 Disabling cookies.

Most web browsers automatically accept cookies, but if required, the User can change the settings of their browser to block such cookies in the future. The general settings of most browsers describe how to prevent a computer from accepting new cookies, how to make the browser notify one when a new cookie is received, or how to disable cookies altogether. Platform users who have disabled cookies will not be able to view certain areas of the Platform

### 8. **Third party analytics.**

8.1 The Company uses automated devices and applications such as Google Analytics and Yandex Metrika to assess the use of the Platform. The Company may also use other analytical tools to evaluate the Platform. The company uses these tools to improve the Platform, performance and user experience. These organizations may use cookies and other tracking technologies to perform their services. The Company does not transfer the User's Personal Information to such third parties.

### 9. **Links to third party websites**

9.1 The Platform may contain links to third party websites. Any access to and use of such linked websites is not governed by this Policy but by the privacy policies of those third-party websites instead. The company is not responsible for the information practices of such third-party websites.

### 10. **Security of the User's Personal Information**

10.1 The Company has taken reasonable precautions in accordance with applicable laws and regulations to protect the Personal Information that the Company collects from loss, misuse and unauthorized access, disclosure, alteration and destruction. The user agrees that no data security measures can guarantee 100% security. Therefore, all Users (including their Authorized Persons) of the Platform must comply with the security requirements set out in the Terms of Use and take the following additional steps to help ensure the security of their Personal Information and access to their Account:

- ensure the security of private keys and passwords used to access crypto wallets and keep them safe and confidential and not transfer this data to third parties.
- beware of fake resources and phishing websites. The platform has only one website address, which is <https://market-up.co>.
- install anti-virus, anti-spyware and firewall software on their personal computers and mobile devices.
- regularly update operating systems, antivirus and firewall products with security patches or newer versions.
- remove file and printer sharing on computers, especially if they are connected to the Internet;
- regularly back up your critical data;
- consider using encryption technology to protect highly sensitive or confidential information;
- completely log out of the system and clear the browser cache after the end of each online session with the Platform;
- not install software or run programs of unknown origin;
- delete unwanted emails;
- not open email attachments from strangers;
- not disclose personal and financial information to obscure or suspicious websites;
- not use a computer or device that one cannot trust;
- not use public computers or Internet cafes to access online services or conduct financial transactions.

10.2 The User must immediately notify the Company by \_\_\_\_\_ if they become aware of any unauthorized use or access to the User's Account or User's login information. The Company is not responsible for any lost, stolen, or compromised User's login information or for any actions within their Account as a result of unauthorized use of User's login information.

## **11. Access rights, corrections and deletions**

11.1 The User can access, edit, update or delete their Account or Personal Information that the Company has collected at any time by going to the account settings or by sending us an email by \_\_\_\_\_. The Company will respond to the User's requests within a reasonable time but no later than by the deadline established by law.

11.2 Notwithstanding the foregoing, circumstances may arise in which the Company will not be able to comply with a request to edit, update, access, or delete the Account profile or Personal Information. This includes but is not limited to:

- any ground on which such a request may be denied in accordance with applicable law;
- if it is necessary to retain such information in accordance with federal, state, or local laws, as well as for accounting or tax purposes;
- when a civil, criminal, or regulatory investigation or a subpoena from federal, state or local authorities is required;
- when it is necessary to cooperate with law enforcement authorities regarding conduct or activity that in the reasonable and good faith of a business, a service provider or a third party may violate federal, state or local law;
- where it is necessary to store information for exercising or defending legal claims;
- if the information contains legal privileges or information belonging to another party; or
- in cases where the fulfillment of the request would jeopardize the privacy of others or other legal rights.

11.3 If the Company decides that it cannot respond to any request in any particular case, it will provide an explanation of why such a decision was made and a contact point for any further requests. To protect the privacy of the User, the Company will take commercially reasonable steps to verify the identity before responding to any request in accordance with this provision, including complying with any applicable legal requirements to verify the identity of the User.

## **12. Transfer of information**

12.1 The Company may store the User's Personal Information on servers located in the countries where the Company's main offices are located. If such jurisdiction is outside the jurisdiction of the User's residence, the User agrees to transfer Personal Information to such jurisdiction for the purpose of providing the User with the Platform, even if such other jurisdiction has less protection of Personal Information than their jurisdiction of residence.

## **13. Information storage**

13.1 The Company stores the User's Personal Information as long as the Account on the Platform is used. We will stop storing User's Personal Information or remove the means by which Personal Information may be associated with specific individuals, as soon as it is reasonable to assume that:

- the purpose for which this Personal Information was collected is no longer served by the storage of such information; and
- storage is no longer necessary for legal, accounting or business purposes.

User agrees that some laws may require us to keep records of transactions or accounts for a certain period of time.

## **14. Children's privacy.**

14.1 The platform is not intended for children under 18 years of age. If the Company discovers that a child under the age of 18 has provided Personal Information to the Company, the Company will remove such information from all systems.

## **15. Communication with the Company:**

15.1 If the User has any questions about the confidentiality aspects of the Platform, the User can contact the Company through the internal services of the Website or by e-mail \_\_\_\_\_.

## **16. Changes to this Policy**

16.1 This Policy comes into force from the moment it is published. The Company can introduce changes to the Policy. The new version of the Policy comes into force from the moment it is published on the Website. For this reason, the User should regularly check the Website for changes.