

Integrity Policy for Protection of Personal Data

We respect your privacy. In this integrity policy for the protection of personal data (hereinafter referred to as the "Policy"), we describe how we process personal data, which personal data we collect, why we collect it, with whom we share the personal data, how we protect it and which choices you can make with respect to our processing of your personal data.

The Policy is applicable on all personal data collected, stored or processed by or on behalf of Dgtl Assets Group AB (the "Company", "we" or "us") which has a connection to a specific individual in his/her relations with the Company as a customer, consumer or which is available in the public domain. The Company is responsible for the processing of personal data.

The Policy also includes all websites or mobile websites owned by the Company where personal data is processed, such as www.cryptowisser.com (such website, together with any other website owned by the Company, is hereinafter collectively referred to as the "Website"). The customer (hereinafter referred to as "you") consents through using the Website and/or conveying personal data (or other information) on the Website to that we collect and process the customer's personal data as described in this Policy.

The requirements and guidelines stipulated in this Policy is a supplement to applicable laws and regulations on protection of personal data and does not intend to replace any such applicable laws or regulations on protection of personal data. In the event of a conflict between applicable laws and regulations on protection of personal data and the requirements and guidelines in this Policy, the applicable laws or regulations on protection of personal data shall prevail.

The Company can amend this Policy at any time. It is recommend that you read this Policy from time to time via www.cryptowisser.com in order to be updated in relation to any amendments to this Policy.

1. DEFINITIONS

1.1 In this Policy, a number of definitions are used. They have the following meanings:

- (a) **Processing:** mean such an action or series of actions that are taken in relation to Personal Data, such as collection, documentation, organization, storage, adjustment or modification, compilation, consultation, usage, disclosure through transfer, deconstruction, combination, blockage, deletion or destruction.
- (b) **EEA:** means the European Economic Area (consisting of the countries being members in the EU, plus Iceland, Norway and Liechtenstein).
- (c) **Personal Data:** means data that can be referred to a living person and which makes it possible to identify such person, alone or together with a combination of other information. A description of which Personal Data that is processed by the Company can be found in Section 3 below.

2. MAIN PRINCIPLES IN THE POLICY

We appreciate to be given the confidence to process Personal Data and we are determined to process them in a correct, transparent and secure manner. We have, *inter alia*, the following main principles in our Policy:

- **Collection of information:** We only collect Personal Data in a correct, legal and transparent way.

- **Data minimization:** We limit the collection of Personal Data to what we deem to be relevant and important based on the purposes described in this Policy.
- **Correct information:** We make sure that your Personal Data is kept updated and correct.
- **Data security:** We take appropriate technical and organizational measures in order to create an adequate level of security in relation to the risks inherent in the handling of the Personal Data to be protected. Such measures shall prevent unlawful disclosure of, or unlawful access to, Personal Data and also prevent accidents, losses, amendments or other unlawful processing.
- **Availability and rectifications:** We will process your Personal Data with your right to personal integrity taken into account.
- **Storage of information:** We will store your Personal Data in a way which is in accordance with applicable laws and regulations on protection of personal data. We will not store your Personal Data during a longer period of time than what can be deemed necessary based on the purposes described in this Policy.
- **Third parties:** We will ensure that access to, and transfer of, Personal Data by and to third parties are carried out in accordance with applicable laws and regulations on protection of personal data and that appropriate agreed security measures are taken in relation to such transfer.
- **Direct marketing and cookies:** When we send you advertisements or place cookies on your computer, we will ensure that is made in accordance with applicable laws and regulations.

3. COLLECTION OF DATA

3.1 PERSONAL DATA THAT YOU GIVE DIRECTLY TO US

We collect information directly from you when you leave information on the Website, or call or e-mail us or leave information directly to us in any other way.

The Personal Data that you leave directly to us can include:

- (a) Personal security number, name, age, address, previous addresses, phone number, email-address, nationality, holdings of digital currencies,

3.2 PERSONAL DATA WE COLLECT AUTOMATICALLY

When you visit the Website or in any other way communicate with the Company online, the following information can be collected (pursuant to Section 10 below):

- (a) Electronic ID-information, IP-addresses, cookies and log-files, connection times, technical user information, technical and historical information from your browser such as language settings, previously visited websites and operative system.

4. WHY DOES THE COMPANY NEED YOUR PERSONAL DATA?

4.1 The Company processes your Personal Data for the following purposes (hereinafter referred to collectively as the "**Purposes**" and each individually as a "**Purpose**"):

- (a) **Request for information:** To answer your questions or effectuate your requests.

- (b) **Newsletters:** To send news letters to you (if you have chosen to subscribe to the Company's newsletters at any of the Company's websites);
- (c) **Direct marketing:** In order to send e-mails to you or contact you through any other channel of communication you have given us, about content we think that you might be interested in, including information from selected business partners and their respective products and/or services, all of which shall be carried out in accordance with Section 13 of this Policy;
- (d) **Advertisements, marketing and PR:** For advertisements and marketing of the Company's business, studies of customer preferences and for PR-activities in relation to the Company's business;
- (e) **Security:** This Purpose entails all methods, systems and processes the Company uses to protect its intellectual property rights, economic and financial interests and to protect the integrity of its employees and customers;
- (f) **IT-support and development;**
- (g) **Tracking:** Tracking of whether you become a customer at any party listed on our Website and your income triggering actions in relation thereto;
- (h) **Compliance with laws and legal requirement:** This Purpose includes being able to guarantee compliance with laws and regulations and to take initiatives to, progress/advance or defend against legal claims;
- (i) **Historic and statistical research:** This Purpose includes, *inter alia*, collection and processing of Personal Data for statistical research (or where it is important to produce statistical results), analysis of earlier events and in order to establish behavioural patterns and similar things;
- (j) To analyse your usage of the Website in order to improve and develop the Website and/or new services and products, and to inform about updates to the Website;
- (k) To prepare and carry out a consolidation, joint venture, acquisition, divestment or transfer of Personal Data, assets, all or part of the stock in the Company or the Company's business, or any other ownership change, reorganization or corporate transaction (including financing of the Company or financing of any part of the corporate events mentioned in this sub-paragraph); and
- (l) Any other purpose that has been described and communicated to you before your Personal Data is used for such other purpose.

- 4.2 The Company may only process Personal Data to the extent necessary to achieve the relevant Purpose and for other purposes that are explicitly permitted pursuant to applicable laws or regulations on protection of Personal Data.
- 4.3 To the extent necessary pursuant to applicable laws or regulations on protection of personal data, the Company shall notify relevant authorities on its processing of Personal Data.

5. DATA CONTROLLER

The Company is the data controller for all processing of Personal Data that the Company, or any other party on behalf of the Company, conducts if not otherwise stipulated in this Policy.

6. LEGAL BASIS

The legal basis for Processing Personal Data is consent from the customer, by way of the customer accessing the Website and/or utilizing the services provided at the Website.

7. CORRECTNESS OF PERSONAL DATA

It is important to us that your Personal Data is updated and correct. Please inform us of any changes to, or inaccuracies in, your Personal Data as soon as possible. We will do our best to make sure that inaccurate or obsolete Personal Data is deleted, destroyed or corrected. If you believe that the Personal Data we have about you is inaccurate or obsolete, you are entitled to request that our processing of Personal Data is limited while we control if the relevant Personal Data is correct or incorrect.

8. METICULOUS HANDLING AND STORAGE

We will store your Personal Data in a way that is pursuant to applicable laws or regulations on protection of personal data. We will store the Personal Data as long as is necessary pursuant to applicable laws and regulation or pursuant to the Purposes.

9. DATA SECURITY

- 9.1 We ensure that adequate technical and organizational measures are taken in order to prevent unlawful or disallowed processing of Personal Data and also other incorrect usage, destruction, disclosure, acquisition of and loss of Personal Data in the event of an accident. Personal Data may only be processed by a third party that is a personal data processor if such personal data processor undertakes to comply with the aforementioned technical and organizational security measures.
- 9.2 Maintenance of data security entails guaranteeing non-disclosure, integrity and access to the Personal Data:
- (a) **Non-disclosure:** We protect your Personal Data so that they are not unlawfully disclosed to a third party.
 - (b) **Integrity:** We protect your Personal Data so that they are not unlawfully amended by an unauthorized third party.
 - (c) **Access:** We ensure that authorized third parties, if necessary and lawful, will be given access to your Personal Data.

9.3 In the security measures, the following elements are included:

- (a) *Risk analysis and risk assessment:*
- (b) *Organization and human aspects of security:* classing of information, information and education of employees, disciplinary actions upon violations of the rules, employees' awareness of the importance of non-disclosure, effects on outsourcing agreements;
- (c) *Physical security and environmental security:* ensure physical access, prevent and discover/handle physical hazards (fire, water, etc.), backup-systems;
- (d) *Network security:* availability security, list of involved employees, authentication systems;
- (e) *Access logs, tracking and analysis;*
- (f) *Supervisory actions, judgments and maintenance;*
- (g) *Handling of security incidents and continuity:* surveillance systems for security contingencies, preparation of incident/catastrophe plan, continuity plan; and
- (h) *Complete and updated documentation.*

10. COOKIES

Usage of Cookies

- 10.1 We use information from cookies in order to make the Website more user friendly. We can also use certain authorized third parties to, in our place, put cookies on the Website in order to deliver services from them.
- 10.2 We use permanent cookies in several ways, including, but not limited to:
 - (a) Enabling you to move between places at our website and bring information to such places, without having to enter such information more than once;
 - (b) Making it easier for us to adjust the Website so that you recognize the website from one of your previous visits;
 - (c) Enabling us to establish in our relation with cryptocurrency exchanges/trading platforms, cryptocurrency casinos and other similar third party that you have been referred to such party through our website;
 - (d) Giving you access to stored information; and
 - (e) Making certain that we will not ask you to fill out the same questionnaires multiple times.
- 10.3 We (and our authorized third parties) may come to use non-personal information from both permanent cookies and temporary cookies for statistical purposes, such as:
 - (a) Evaluating the Website's contents and functions;
 - (b) Monitoring the usage of the Website (frequency and time);

- (c) To perform surveys so that your interaction with the Website and with us can be improved.

List of cookies

10.4 We use the following cookies in the following manner:

- (a) Cookies.accepted (permanent) – is used in order to confirm that you have received information on our usage of cookies

Third party cookies

10.5 We use a number of third party cookies as a part of our service. These cookies are regulated by the respective websites from which they derive and we do not control them. We have listed the third party cookies we use below. Certain of these cookies can be turned off in your browser settings while others can only be turned off at the respective third parties' respective websites, in accordance with the instructions given at such websites. Our third parties can also use additional cookies over which we have no control.

- (a) Google Analytics – is used as an analysis tool. For further information about this third party cookie, please visit: <https://www.google.se/analytics>. In order to turn off such third party cookie, please see: <https://tools.google.com/dlpage/gaoptout>
- (b) Google Optimize – is used to create different versions of the website in order to see which website performs most according to our preferences. For more information, please see: <https://www.google.com/analytics/optimize/>
- (c) Hotjar – a tool which shows where the visitors to the website navigates, and which is also used to handle survey. For more information, please see: <https://www.hotjar.com/>
- (d) Rubicon Project – used for retargeting advertising. For further information about this third party cookie, please visit: <https://rubiconproject.com/privacy-policy/>
- (e) Mopedo – used for retargeting advertising. For further information about this third party cookie, please visit: <http://mopedo.com/cookie-info/#cookie>
- (f) Albacross – used for tracking traffick for analysis purposes. For further information about this third party cookie, please visit: <https://albacross.com/privacy-policy/>

Deletion of cookies

10.6 You can choose yourself whether you want to accept receiving cookies or not. If you want to know when your computer receives a cookies, you can set your browser settings so that you are notified thereof. In such way, you will have the opportunity to choose whether you shall accept or reject a cookie. Your computer can also be set to reject all cookies. Visit <http://aboutcookies.org> if you want to know how to make this setting.

Please be aware that changes in your browser meaning that the cookie-function is disabled will prevent certain parts of our website from functioning correctly.

11. SHARING PERSONAL DATA

11.1 We may share your Personal Data for the purposes listed above with the following categories of recipients:

- (a) **Authorized employees/partners in the group of companies to which Dgtl Assets Group belongs;**
- (b) **Company partners and subsidiaries to or in the group of companies to which Dgtl Assets Group belongs (which includes all entities listed at our website);**
- (c) **Our advertising and marketing agents:** in order to help us deliver and analyze the effects of our marketing campaigns and offers;
- (d) **Service providers:** companies who provide services for certain purposes on behalf of the Company. The Company can, for instance, share your Personal Data with external IT-service providers;
- (e) **Other parties when it is required by law or in order to protect the Company:** The Company may share your Personal Data with third parties in order to (i) comply with laws, decisions from supervisory authorities, court orders, or if necessary or advisable in legal proceedings, (ii) verify and supervise the Company's compliance with the Company's policies and agreements, and (iii) protect the Company's and/or the Company's customer's rights, property and security;
- (f) **Other parties in connection with company transactions and financings:** The Company may share your Personal Data with third parties in connection with a consolidation, joint venture, acquisition, divestment or transfer of Personal Data, assets, all or part of the stock in the Company or the Company's business, or any other ownership change, reorganization or corporate transaction (including financing of the Company or financing of any part of the corporate events mentioned in this sub-paragraph); and
- (g) **Other parties after your consent thereto or after your instruction thereof:** The Company may share your Personal Data with other third parties after you consent to such sharing or give instructions of such sharing.

11.2 Please note that the recipients mentioned above, in particular service providers offering products and/or services to you through any Company-program or Company-website, may collect information about you separately and that they are responsible for the processing, control and storage of such information. Your rights in relation to such service provider are governed by such service provider's terms and conditions, and you should contact such service provider if you have any questions in relation to the processing, control and storage of such information.

12. DISCLOSURE OUTSIDE EU/EEA

Your Personal Data may be transferred to a third party as stipulated in this Policy. Such third parties may be domiciled outside of EU/EEA and the information can be processed by us and any such third party anywhere in the world. The countries to which your Personal Data may be transferred may possibly not offer a sufficient protection of personal data. In connection with transferring Personal Data to countries who do not

have the same data protection levels as the EU/EEA, the Company shall strive to ensure that actions are taken in order to secure that your Personal Data is adequately protected.

13. YOUR RIGHTS

- 13.1 *Your Personal Data:* You can always contact us via mail or email and control which information we have of you, from where it originates and how we have used it. You are also entitled to receive access to the Personal Data we have collected on you.
- 13.2 *Your corrections and your access:* If you believe that there are inaccuracies in your Personal Data, or that they are incomplete, you may also request that we change or supplement such incomplete or incorrect Personal Data.
- 13.3 *Your objections:* You may object to the processing of your Personal Data for direct marketing purposes (if you wish, you may also clarify for us how often and through which channel you would like to be contacted by us) or to sharing of your Personal Data with third parties for the same purpose (see Section 4.1(c) above).
- 13.4 *Data portability:* You may ask to receive your Personal Data in a structured, electronic and commonly used format. You are also entitled to transfer your Personal Data to another Personal Data controller without us obstructing that, as long as it is technically feasible. If you would like to exercise any of your rights pursuant to this Section 13.4, please contact the Company's at email address: support@cryptowisser.com.
- 13.5 You can also require that we delete information about you (however, excluding information that are verifications of a transaction or information we are required to maintain pursuant to any law or regulation).
- 13.6 Contacts pursuant to Sections 13.1 – 13.5 shall be directed to the Company at support@cryptowisser.com. Objections pursuant to Section 13.3 may also be presented through using the unsubscribe preference settings in the marketing material.

14. AMENDMENTS

- 14.1 The Company is entitled to amend this Policy by posting an updated Policy including relevant amendments at the Website. The amendments will come into force with immediate effect.

15. CONTACT

- 15.1 In any matter involving secrecy, questions or complaints in relation to this Policy or in relation to the exercise of any of your rights under this Policy, you may contact the Company's at the Company's email address: support@cryptowisser.com.
- 15.2 Complaints on the Company's personal data processing may also be set forth to the Swedish Data Protection Authority (the "DPA") (Sw. *Datainspektionen*) at email-address datainspektionen@datainspektionen.se or postal address Datainspektionen, P.O. Box 8114, 104 20 Stockholm, Sweden. The DPA recommends that any complaints shall include the following information: (i) the subjects of the complaint, (ii) what the customer is dissatisfied with (as detailed as possible), (iii) description of what has happened and when, and (iv) copies, pictures or printouts of what the customer is complaining about.