

WEBSITE PRIVACY POLICY

1. INTRODUCTION

In connection with your interest in A&D Best Trade s.r.o. online platform and its activity and products (hereinafter referred to as the "Company products") and services, we outline ongoing obligations of A&D Best Trade s.r.o., address Na Folimance 2155/15, Vinohrady (Praha 2), 120 00 Praha, company number 19929943 (hereinafter referred to as the "Company", "we" or "us" or "our") to you in respect of how the Company manages your personal data, as defined under the EU General Data Protection Regulation (GDPR), i.e. information by which you may be directly or indirectly identified ("Personal Data").

The Company respects the privacy of our users ("user(s)" or "you"). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website <https://www.adbesttrade.com> and/or our mobile application version, including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the "Site" or "Website"), Company products and services. Please read this privacy policy carefully. If you do not agree with the terms of this privacy policy, please do not access the Site. For the Company, the privacy and security of our users (hereinafter sometimes also referred to as the "Users" or "You") are of paramount importance. The Company ensures that Personal Data of the users will be treated confidentially. The Company is not responsible for the privacy policy of other websites and sources. The data content of the Site is intended for general information purposes only. The Site should be used for general research purposes only. Consequently, the information contained on the Site has not been prepared in accordance with the relevant rules and regulations governing such publications in various jurisdictions.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the "Last Updated" date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. For users that are citizens of the European Union ("EU"), this Privacy Policy is subject to the provisions of the GDPR and other applicable privacy laws. In such a case, we agree that under the GDPR, we are a data "Controller" and you are a "Data Subject" with certain protected privacy rights concerning your "Personal Data." We will take all steps to maintain compliance with GDPR requirements. Under the GDPR, we are known as the "Controller" of the Personal Data that you provide to us.

We have designated a Personal Data Protection Officer at our Company to be accountable for our policies and practices with respect to the management of Personal Data. You may forward any Personal Data access requests, questions, comments or complaints that you might have about this Privacy Policy to:

Anastasiia Dugina

Email to: adbesttrade@gmail.com

We provide this Privacy Policy to you in the English language, however we will provide translations to you in other languages upon your request (please contact the Personal Data Protection Officer).

2. COLLECTION OF YOUR INFORMATION

We save your Personal Data at the Company's servers and take all possible measures to protect it and keep it in full security.

We may use your Personal Data for marketing purposes, e.g. updating you on the Company news, activity, etc.

We will share your Personal Data with third parties only in the ways that are described in this Privacy Policy. We do not otherwise sell or collect your personal information to third parties.

We may collect information about you in a variety of ways exclusively by the verification tool implemented to our Site. The information we may collect on the Site may include:

Personal Data

Biographical information and contact information, financial information, trading information, PEP information (where relevant), verification information and other information. Personally, identifiable information, such as your name, address, email address, ID number and telephone number, and demographic information, that you voluntarily give to us when you register with the Site and/or our mobile application, or when you choose to participate in various activities related to the Site and our mobile application, such as online chat and message boards. You are under no obligation to provide us with personal information of any kind, however your refusal to do so may prevent you from using certain features of the Site and our mobile application.

Derivative Data

Information our servers automatically collect when you access the Site, such as your IP address, your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site. If you are using our mobile application, this information may also include your device name and type, your operating system, your phone number, your country, your likes and replies to a post, and other interactions with the application and other users via server log files, as well as any other information you choose to provide.

Mobile Device Data

Device information, such as your mobile device ID, model, and manufacturer, and information about the location of your device, if you access the Site from a mobile device.

Third-Party Data

Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the Site permission to access this information.

Mobile Application Information

If you connect using our mobile application:

- *Geo-Location Information.* We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

- *Mobile Device Access.* We may request access or permission to certain features from your mobile device, including your mobile device's [bluetooth, calendar, camera, contacts, microphone, reminders, sensors, SMS messages, social media accounts, storage,] and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- *Mobile Device Data.* We may collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.

- *Push Notifications.* We may request to send you push notifications regarding your account or the Application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.
- *Aggregate Information.* We may also collect anonymous, non-identifying and aggregate information such as the type of browser you are using, device type, the operating system you are using, and the domain name of your Internet service provider.
- *Third Party Personal Data Collection.* Company will generally collect your Personal Data only from you. There are, however, some circumstances when for purposes of protecting your interests, Company may receive Personal Data from third parties. In such cases, Company will take reasonable steps to make you aware of any Personal Data that we may receive from a third party.

In addition, we may collect:

- *Personal Information:* This may include your name, email address, contact information, and any other information you provide during the registration or verification process.
- *Financial Information:* We may collect payment-related information for processing transactions, which can include bank account details, credit card information, or cryptocurrency wallet addresses.
- *Identification Documentation:* To comply with legal regulations and security standards, we may collect identification documents, such as government-issued IDs, passports, or driver's licenses during the KYC verification process.
- *Transaction Data:* We collect data related to your cryptocurrency transactions, including transaction history, amounts, sender and receiver details, and timestamps.
- *Device Information:* We may collect device information, such as IP addresses, browser type, operating system, and other technical data for security and analytical purposes.
- *Cookies and Analytics:* Our website may use cookies and analytics tools to gather information about your browsing behavior, preferences, and interactions with our platform.

Please note that the specific data collected may vary depending on the nature of your platform and the services you provide. It's important to outline what data is collected and how it is used in your Privacy Policy to ensure transparency and compliance with data protection laws.

3. USE OF YOUR INFORMATION

We collect this data to provide our products and services, including payment processing and to enable the completion of the client on-boarding process, for the purposes of identity verification, compliance with court orders, tax laws or other reporting obligations and anti-money laundering controls, to administer our products and services, to provide you with information in respect of our products and services and review your ongoing needs, to troubleshoot our products and services, to improve our products and services and to develop new products and services, For internal business purposes and recordkeeping, to notify you of changes to our products or services and/or to laws and regulatory rules and regulations and to communicate with you

As part of processing your personal data for the purposes set out above, Company may disclose your personal data to any members of the Company, and to third parties. For example, Company may disclose your personal data to any of our service providers and business partners, for business or other legitimate

purposes, such as specialist advisors who have been contracted to provide us with administrative, financial, legal, tax, compliance, insurance, IT, debt-recovery, analytics, research or other services.

If Company discloses your personal data to service providers and business partners, in order to perform the services requested by clients or to comply with our legal and regulatory obligations, such providers and partners may store your personal data within their own systems. We require them to protect the confidentiality of this personal data, and comply with all relevant privacy and data protection laws.

The data stored in the database can vary based on the platform and its functionality. However, for the P2P virtual assets services, the following types of data are commonly stored in the database:

1. User Account Information: - User IDs

- Usernames
- Email addresses
- Password hashes (securely encrypted) - Verification status (KYC, AML)

2. Financial Data:

- Cryptocurrency wallet addresses (if applicable)
- Transaction history (including buy/sell orders) - Deposit and withdrawal records
- Balance information for each cryptocurrency

3. Personal Identification Data:

- Scanned copies of identification documents (passport, driver's license) - Selfies for identity verification and Proof of address documents

4. Security Information:

- IP addresses and device information (used for security monitoring)
- Login history and activity logs and Session tokens and access logs

5. Communication Data:

- Customer support interactions and Support ticket history

6. Preferences and Settings:

- Language preferences and Communication preferences (e.g., email notifications)

7. Analytics and Cookies Data:

- Website usage analytics and Cookies data for tracking user behavior and preferences

4.OBLIGATION TO PROVIDE PERSONAL DATA

On various pages on the Website, we may request specific Personal Data about you in order to register you for an account to use our services or to provide you with our services, add you to our email list, facilitate your payments for Services (if any), or fulfill your requests for information.

In the context of the functioning of the Website, you only have to provide the Personal Data that is necessary for the Company to reply to your requests, or for the Website to run properly.

However, please be aware that without certain types of Personal Data (notably Personal Data relating to cookies that are necessary to be able to browse the Website), the Company will not be able to duly reply to your requests or some parts of the Website may become inaccessible.

You may choose not to provide your Personal Data, but then you might not be able to take advantage of some of the features of our Platform. We only collect basic personal data about you that does not include any special types of information (e.g., health-related) as defined in the GDPR.

5. DISCLOSURE OF YOUR INFORMATION

In general, we will not share your Personal Data except: (a) for the purposes for which you provided it; (b) with your consent; (c) as may be required by law (e.g., in response to a court order or subpoena, or in response to a law enforcement agency request); (d) as we think necessary to protect you, our organization or others from injury (e.g., when we believe that someone is causing, or is about to cause, injury to or interference with the rights or property of another); or (e) on a confidential basis with persons or organizations with whom we contract to carry out internal site operations or as necessary to render the Services (e.g., Amazon Web Services). We may also share your Personal Data with our business partners. We may also share aggregate information with others, including affiliated and non-affiliated organizations. Finally, we may transfer your Personal Data to our successor-in-interest in the event of an acquisition, sale, merger or bankruptcy.

Further, the following recipients may also receive your Personal Data:

- government, regulators or attorneys and supervisory authorities;
- shareholders, agents, employees, consultants, representatives, auditors.

In conclusion, we may share information we have collected about you in certain situations:

By Law or to Protect Rights

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

Third-Party Service Providers

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, IT or website services, archiving storage providers, customer service, and marketing assistance.

Interactions with Other Users

If you interact with other users of the Site and our mobile application, those users may see your name, profile photo, and descriptions of your activity, including sending invitations to other users, chatting with other users, liking posts, following blogs.

Online Postings

When you post comments, contributions or other content to the Site or our mobile applications, your posts may be viewed by all users and may be publicly distributed outside the Site and our mobile application in perpetuity.

By Law or to Protect Rights

We may use third-party advertising companies to serve ads when you visit the Site or our mobile application. These companies may use information about your visits to the Site and our mobile application and other websites that are contained in web cookies in order to provide advertisements about goods and services of interest to you.

Affiliates

We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

Business Partners

We may share your information with our business partners to offer you certain products, services or promotions.

Social Media Contacts

If you connect to the Site or our mobile application through a social network, your contacts on the social network will see your name, profile photo, and descriptions of your activity.

Other Third Parties

We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

Sale or Bankruptcy

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline honor commitments we made in this Privacy Policy.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

6. TRACKING TECHNOLOGIES Cookies and Web Beacons

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site and our mobile application to help customize the Site and our mobile application and improve your experience. To enhance your online experience with us, our web pages may presently or in the future use "cookies." Cookies are text files that our web server may place on your hard disk to store your preferences. When you access the Site or our mobile application, your personal information is not collected through the use of tracking technology. You have the choice of deciding whether to accept or reject cookies, but be aware that such action could affect the availability and functionality of the Site or our mobile application.

Internet-Based Advertising

Additionally, we may use third-party software to serve ads on the Site and our mobile application, implement email marketing campaigns, and manage other interactive marketing initiatives.

7. THIRD-PARTY WEBSITES

The Site and our mobile application may contain links to third-party websites and applications of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the Site [or our mobile application], any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information.

Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Site or our mobile application.

8. SECURITY OF YOUR INFORMATION

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

9. RETENTION PERIODS

We have physical, electronic, and managerial procedures in place to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect. Unfortunately, no data transmission or data storage solution can ever be completely secure. As a result, although we take industry-standard steps to protect your information (e.g., strong encryption), we cannot ensure or warrant the security of any information you transmit to or receive from us or that we store on our or our service providers' systems.

We store Personal Data for as long as reasonably required for its purpose. We may, however, store information longer for legitimate business reasons (for example, Personal Data may remain in backups for a reasonable period of time), or as legally required. Otherwise, we only store your Personal Data until you request us to remove it from our servers. We store our logs and other technical records which do not contain any identifiable data anymore, indefinitely.

The retention periods for your Personal Data are based on the Company's business needs and legal requirements. The Company may notably retain:

- Personal Data you have submitted to the Company through a specific request until we have responded to your request or until the end of the exchange relating thereto, plus ten (10) years as of the end of such communication; and
- cookies for a maximum of six (6) months after your last use of the Website.

The Company may also retain your Personal Data other than related to cookies for up to two (2) years for statistics, business analysis and marketing purposes.

Safeguarding the information, you give us or we receive about you through the Site is a priority for the Company. Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure. The Company has taken steps to ensure the ongoing confidentiality, integrity, availability, and resilience of systems and services processing personal information, and will restore the availability and access to information in a timely manner in the event of a physical or technical incident.

When your Personal Information is no longer needed for the purpose for which it was obtained, the Company will destroy or permanently de-identify your Personal Information.

10. POLICY FOR CHILDREN

We do not knowingly solicit information from or market to children under the age of 18. If you become aware of any data we have collected from children under age 18, please contact us using the contact information provided below. We do not knowingly collect any information from any minors, and we comply with all applicable privacy laws including the GDPR rules for collecting Personal Data from

minors. Our Platform will not knowingly accept Personal Data from anyone under 18 years old in violation of applicable laws, without consent of a parent or guardian. In the event that we discover that a child under the age of 18 has provided Personal Data to us without parental consent, we will make efforts to delete the child's information. If you have concerns about the Platform, wish to find out if your child has accessed our Platform, or wish to remove your child's Personal Data from our servers, please contact our Data Protection Officer.

11. OPTIONS REGARDING YOUR INFORMATION

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Emails and Communications

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the Site or our mobile application
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

12. TRANSFER OF PERSONAL DATA

Your Personal Data will not be transferred outside of the European Economic Area.

13. AUTOMATED DECISIONS MAKING OR PROFILING

In general, the Company does not use automated individual decision-making or profiling in the course of the relationship with you. Should the Company rely on such processing, the Company would inform you separately.

14. USERS RIGHTS

The exercise of the below rights is free of charge and not bound to any formalities.

Right to information, rectification, erasure and restriction of processing

You may request to obtain, within reasonable intervals, and in a timely manner, the communication of your Personal Data that is being processed by the Company, as well as all information on the origin of those Personal Data.

You also have the right to rectify Personal Data that is inaccurate.

In cases where the accuracy of the Personal Data is contested, the processing is unlawful, or where you have objected to the processing of your Personal Data, you may ask for the restriction of the processing of such Personal Data. This means that Personal Data will, with the exception of storage, only be processed for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural

or legal person or for reasons of important public interest of the European Union or of an EU Member State. In case a processing is restricted, you will be informed before the restriction of processing is lifted.

You may request the deletion of Personal Data, without undue delay when the use or other processing of such Personal Data is no longer necessary for the purposes described above, and notably when consent relating to a specific processing has been withdrawn or where the processing is not or no longer lawful for other reasons.

Right to object

You may object to the processing of your Personal Data which is based on the legitimate interests pursued by the Company or by a third party. In such a case the Company will no longer process your Personal Data unless the Company or the third party has compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Right to withdraw consent

You have the right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal. The withdrawal only affects future processing.

A possibility to unsubscribe from the electronic Company newsletter is provided by default in form of an "Unsubscribe" link at the end of each newsletter.

Right to data portability

Where the processing of your Personal Data is based on consent or the execution of a contract with you, you also have the right to data portability for information you provided to the Company– this means that you can obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and potentially transmit it to another controller.

Right to lodge a complaint

In the event that you wish to complain about how the Company processes your Personal Data, and/or if you want more details on the processing of your Personal Data and/or if you have any specific queries or concerns regarding the processing of your Personal Data, please contact the Company in the first instance using the contact our DPO.

This is without prejudice to your right to file a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the GDPR.

15. FINAL PROVISIONS

Because our business needs may change over time, we reserve the right to modify this Privacy Policy. If at any time in the future we plan to use your Personal Data in a way that differs from this Privacy Policy, we will revise this Privacy Policy as appropriate. In the event of a change to our Privacy Policy, we will email the updated policy to the email address that you provided to us.

16. CONTACT US

If you have questions or comments about this Privacy Policy, please contact us at:

adbesttrade@gmail.com