

**PRIVACY NOTICE**  
**2021.02**

The objective of this Policy is to ensure that the data processing rules of the website [www.coinmixed.eu](http://www.coinmixed.eu) comply with the provisions of Mixed Trade Kft (2377 Örkény Fő u 20, VAT: HU24967170 ) (hereinafter: Data Controller), with the pertinent statutory requirements and the rules of the trade with regards to data protection.

**Principles of data protection, in line with the applicable laws and regulations, especially the following:**

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Information Act, Data Protection Act)
- Act CXXXIII of 2005 on persons and property protection and on the activity of private detectives (hereinafter: Security Act)
- Act V of 2013 on the Civil Code – Directive 95/46/EC of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data
- Act XLVII of 1997 on the processing and protection of personal data
- Regulation (EU) 2016/679 of the European Parliament and of the Council

Data Controller puts forth all the effort to adhere to the recommendations of the Hungarian National Authority for Data Protection and Freedom of Information, especially the recommendation issued on 29 September 2015; therefore, Data Controller expresses data protection controls in the clearest way, if necessary, demonstrating with examples, along with the detailed elaboration of the individual data controlling activities, so that the data subject has sufficient information to decide whether he/she gives his/her voluntary consent to such activities. Personal data may only be processed by Data Controller to the extent and time period necessary for the purpose of the processing.

**Consent to the Processing of Information:** By registering to or using other services offered by [Coinmixed.eu](http://Coinmixed.eu), User gives his/her express consent to the processing of data voluntarily provided by him/her.

**Scope of Data Subjects:** Individuals using the services of the [www.coinmixed.eu](http://www.coinmixed.eu) (Users).

**Processed information:** Information provided by Users during the use of the services offered by the website [www.coinmixed.eu](http://www.coinmixed.eu) that are necessary for the provision of the services are: name, contact details (telephone number, email address), address, billing address, Bitcoin address, data indicated on the identification document (ID card, driver's license, passport) based on a photocopy/scanned picture, bank account statement, address card or utility bills.

**Collection of Personal Data:** Personal data shall mean any and all information suitable for your direct or indirect identification or using of which you can be contacted. Our data protection guidelines cover all personal data you voluntarily provide us and data we obtain from our partners. These data protection guidelines do not cover anonymized data, as such information cannot be used for identification. Except for the cases covered in this Privacy Notice, Data Controller may not disclose, sell, rent or borrow personal data to third parties. Collection of Users' personal data shall be subject to law or shall be relevant for the given purposes. Information provided to us are not necessarily deemed voluntary. You may choose whether you provide us with the requested personal data; however, we may not be able to efficiently

serve you or provide our services if you choose not to disclose such information to us. More specifically, we collect personal data necessary to open an account, add a payment method or to conduct a transaction, as per the statutory provisions. We also request your personal data when you request information about our services, you subscribe to our marketing communication, you request comprehensive assessment or sign up for company events. We may collect your personal information offline, for example, when you participate one of our events or you contact our customer service. We may use such information together with other information collected about you.

**We collect the following types of information:**

- Personal identification data: Surname and given name, name at birth, place and date of birth, mother's name at birth, nationality, sex, signature, photographs, telephone number, address and email address.
- Documents evidencing personal identity: Tax number, passport, driver's license, national ID card, resident card, visa information.
- Financial information: bank account details, bank account agreements
- Transaction information: information about transactions conducted through our services, for example, the name of recipient, amount and time stamp.
- Online identifiers: geographical location / tracking data, browser fingerprint, operating system, browser name and versions, along with personal IP addresses.
- Data pertaining to the use: survey responses, information you provide to our support team, public social media posts, authentication data, security questions, user ID, click information and other information collected by cookies or similar technologies.

**Purpose of processing:** Delivery of orders, invoicing, cooperation with authorities, prevention of money laundering and financing of terrorism. Use of personal data: Our primary aim collecting personal data is to be able to provide secure, smooth, efficient and customized services to you. Usually, we use personal data for the provision of our services, to create and develop, operate and transmit content and ads or prevent losses and combat fraud. These information are used as follows:

- Maintenance of legal compliance and adherence to rules.
- Enforcing our Services Agreement and other Agreements
- Provision of our Services
- Communication when Providing Services
- Customer Service
- Quality Assurance
- Network and Information Security
- Research and Development Purposes
- Enhance the user experience of our website
- Facilitate corporate acquisitions, mergers or transactions
- Marketing activities

**Protection and Storing of Personal Data:** We are aware of the importance of confidentiality; therefore, the Company maintains (and obliges its service providers to do the same) adequate physical, technical and administrative measures to protect your personal data and the

confidentiality of such data. Personal or transaction information or parts thereof – including certain confidential bank accounts and/or route numbers – may be stored or processed by us anywhere in the world where our facilities or service providers are located. Your personal data are secured by our adherence to the applicable regulations and rules and by maintaining physical, electronic and procedural protection methods. For example, we use computer-based protection, such as firewalls, data encoding, access control facilities and files. We only allow access to personal data for staff whose access is necessary for the completion of their tasks. However, we cannot guarantee that loss, misuse, unauthorized access or alteration of data will not occur. Please, take your role in the protection of your personal data seriously. When you subscribe to our services, choosing a long and complex enough password is important. You should not disclose such passwords to third parties and you should inform us of any unauthorized access to your account without delay. In addition, we cannot guarantee security or confidentiality of data sent or received through the Internet or wireless connections, for example, email, telephone or text messages, as we are not in the position to protect these until we receive the pertinent message. Should you have a good reason to assume that your data are no longer secure, we request you to contact us at our email address, mailing address or telephone number indicated below.

**Who do we disclose your information to?** The information you entrusted us with will only be disclosed to third parties, if: – you gave us your consent to do so – it is necessary for the performance of this Agreement or to defend our legitimate interests – required by law.

**Our Data Processors:** Our Data Processors are our contractual partners who contribute to the provision of our services. In other words, they are instructed by us, and act in line with our decisions, while we maintain our liability for the processing of your data. They may not use your data independently. After termination of our agreement with them, they shall provide deletion of such data. In such cases, we ensure that the respective data processor applies the appropriate technical and organizational measures to maintain the security of such data. Such payment verification mechanisms include restriction of access to such data and the infrastructure such data are stored on, and an agreement with them that requires them to adhere to the pertinent legislation. Since we operate as a payment service provider, outsourcing of data processing activities are subject to strict law and conditions set forth by the Hungarian National Bank, which we also adhere to. Our data processor partners:

- Mixed Trade Kft's Coinmixed.eu secure servers are operated by tarhely.eu .
- Our customer service call center is operated by Adertis Kft.
- Imbookeppeng Ltd. is contributing to the completion of our bookkeeping tasks.

**Experts necessary for the prudent operation:** Employing an auditor and compliance officer is a statutory requirement we must fulfill. These experts also ensure compliance of our activities with the statutory requirements. To be able to complete their tasks, we may disclose personal data to them. However, auditors and compliance officers are not considered as data processors, because, in line with the pertinent statutory provisions and the rules of the trade, they are entitled to dispose over such data independently.

**Attorney-at-Law necessary for exercising rights and fulfillment of obligations:** During the operation of [www.coinmixed.eu](http://www.coinmixed.eu), the necessity of legal expertise or advisory services may arise, which we will solve by soliciting the services of an external attorney-at-law. The most common cases: investigation of customer complaints, bringing claims or solution of legal disputes. To be able to complete their tasks, we may disclose personal data to them. However,

attorneys-at-law are not considered as data processors, because, in line with the pertinent statutory provisions and the rules of the trade, they are entitled to dispose over such data independently.

**Statutory Requirements:** Should we be mandated by law to disclose your information to third parties, we will do so. Such mandatory data disclosures to law enforcement bodies or other authorities are set forth by law, or for the prevention of money laundering and financing of terrorism, to the bank maintaining our escrow account. Additionally, we may verify your personal data in the register of personal data and addresses.

**Term of Data Processing:** Personal data stored electronically or on paper will be deleted within 365 days of the delivery of your order.

**Consumers may request that the Data Controller:**

- inform them about the processing of their personal data
- rectify their personal data
- delete or block their personal data

When you use the services offered by the website [www.coinmixed.eu](http://www.coinmixed.eu), the data valid at the time of using such services this time of use of the services is added to the storing interval. You may initiate information of your personal data associated with the use of the services, or rectification or deletion of the same personally with the Data Controller or via email. Data Controller shall provide the requested information in writing and in a laymen's term as soon as possible, but within 10 business days of receipt of the request the latest. Should you find your request legitimate, you should take the appropriate measures to rectify or delete such personal data without delay.

**COOKIES** Our website uses cookies to distinguish you from other individuals using our website. This helps us to make your browsing experience better, and at the same time to improve our website.

**Security Technology:** The Company uses Secure Socket Layer (SSL) coding technology to protect information provided to us. This technology serves as prevention of circumvention of your information when you communicate with us. To adequately safeguard information, the Company's servers communicate with private networks through an industrial network, behind an industrial-quality hardware firewall. Should you be dissatisfied with any activities of Data Controller, you may exercise your rights to protect your personal data on the civil court or you may submit your complaint to the following bodies:

- Hungarian National Authority for Data Protection and Freedom of Information