

Privacy Policy

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1. Introduction

1.1 EDC Blockchain Technology Limited (" **we**") are committed to safeguarding the privacy of our data-subjects (" **you**" or " **user**") ; in this policy we explain how your personal data, meaning any information relating to you as an identified or identifiable natural person, that we may hold about you, is collected, used, stored, disclosed, and removed (each and all referred to as " **processing**").

1.2. We do not collect any personally identifiable information from children under the age of 16. If you believe that a child under the age of 16 has provided us with personally identifiable information, please contact our customer support.

1.3. This Policy only applies to information we process. It does not apply to the practices of companies that we don't own or control, or employees that we don't manage. Information on our services' may contain links to third party websites, and any information you provide to those sites will be covered by any privacy policies they may have. Please be sure to read the privacy policies of any third-party sites you visit. It is those sites' responsibility to protect any information you give them, so we can't be held liable for their wrongful use of your personally identifying information.

1.4. We may update this policy from time to time and will notify you of changes to this policy affecting your rights by email and/or by posting on our website at <https://blockchain.mn>

2. Your Personal Data and How We Use It

2.1. In Section 2 we set out:
the general categories of data and types of personal data that we may process;
the source of that personal data;

the purposes for which we may process personal data; and the legal bases of the processing.

2.2. We may process your registration data ("registration data").

Registration data may include your username, email address, phone number. The source of the registration data is you.

Registration data is required in order for you to be able to use the service. The legal bases for this processing are consent and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract;

2.3. We may process your account data ("account data"). Account data may include your full name, email address, username, country, and telephone number. The source of the account data is you. The account data may be processed for the purposes of providing our services, ensuring the security of our users and services, and communicating with you. Verifying the full name helps protect users against fraudulent payments, increase user's trustworthiness, and provides an alternative way to access user's <https://wallet.blockchain.mn/login> wallet in case the password is lost or the account is hacked. Phone number is used for notification purposes and is an alternative mechanism to identify users in case the password is lost or account gets hacked. The legal bases for this processing are consent; the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; and our legitimate interests, namely the operation of our business model.

2.4. We may process data about your use of our website and services ("usage data"). Usage data is primarily non-personally-identifying information of the sort that web browsers. Other non-identifying information that we might have access to includes how you use the service (e.g. search queries), your approximate location, cookies set by our site, etc. Usage data may include:

1) Data that we collect mainly for behavioral statistics, business intelligence and email campaigns and this data may also contain

your email address, IP address, and country code. 2) Data that we collect mainly for technical, security and/or fraud prevention reasons or for tracking errors ("technical data"). We also log certain events from your actions on our site.

The legal basis for this processing is our legitimate interests of ours and/or by third-parties, namely to monitor service quality and improve our website and services as well as to prevent, detect and investigate fraud, criminal activity or another misuse of the services and to prevent security issues.

2.5. We may process data relating to coins transactions in and out of your wallet. Information stored on received transactions may include a timestamp, amount, deposit address (unique) and transaction ID and other publicly available data. Withdrawal transactions may include data such as timestamp, amount, sent address, transaction ID, and description. The legal bases for this processing are consent; the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the operation of our business model.

2.6. We may process information contained in or relating to any communication that you send to us or what you generate through the use of our service ("communication data"). Communication data includes: all your messages, requests and other communication with our customer support which may happen during the dispute review process, emails, or by means of any other communication tool; and Communication data may include, email address, username, IP address, full name, audio and video files and in the case of manual ID verification: photo of the user's personal ID, photo of the user, and photo of the user's utility bill or related document. The communication data may be processed for the purposes of communicating with you, record-keeping, in order to review and resolve disputes, serve our customers better and improve our service. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

2.7. We may process information that you provide to us for the purpose of subscribing to our email notifications, SMS notifications("notification data"). The notification data may include your email address, phone number, username, and full name. The notification data may be processed for the purposes of sending you the relevant notifications. The legal basis for this processing is consent. You can unsubscribe at any point by contacting us or by clicking the unsubscribe link in the email.

2.8. In connection with the activities described above, we may conduct profiling based on your interactions with any content that you provide to our service, and/or information obtained from external services. In limited cases, automated processes may restrict or suspend access to our service if such processes detect activity that we think poses a safety or other risk to our service, our users or third parties. We process this information given our legitimate interests in protecting our service and brand; preventing, detecting and investigating fraud, criminal activity or another misuse of the services; optimizing the products and services offered and/or complying with applicable laws.

2.9. We may process any of your personal data when necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or outside the court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.10. In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.11. We may disclose your personal data 1) to our auditors, lawyers, accountants, consultants and other professional advisors insofar as it is reasonably necessary for the purposes of obtaining professional advice or managing legal disputes and risks; 2) where such disclosure is necessary for compliance with a legal

obligation to which we are subject, in order to protect your vital interests and/or the vital interests of a third-party.

2.12. All the aforementioned general categories of data may contain data that by itself does not identify you and is therefore not deemed as personal data.

2.13. Please try to avoid supplying any unnecessary personal data to us.

3. Information You Choose to Display Publicly on Our Services

3.1. Please remember that if you choose to provide personally identifiable information using certain public features of our services, individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge, and search engines may index that information. We, therefore, urge

you to think carefully about including any specific information you may deem private in content that you create or information that you submit through our Services.

4. Retaining and Deleting Personal Data

4.1. Section 4 sets out our data retention and deletion policies, which are designed to help ensure that we comply with our legal obligations in relation to the user's right to be forgotten.

4.2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

4.3. Users may request the deletion of their account through our site.

4.4. We will retain and delete your personal data as follows:

For all users who have deleted their account:

Personally-identifiable analytics data is removed 14 days after account deletion. Notification data is not generally stored by our processors but they may retain activity logs for a short period of

time (this time varies depending on the processor in question but is not greater than 13 months).

For users who have not conducted or initiated any trades transactions to their wallet, we will delete all personal data 14 days after the approval of your account deletion request.

For users who have conducted or initiated any trades, our data deletion policy is the following:

Your public profile will be hidden 14 days after you delete your account.

Your communication data will be deleted 5 years after you delete your account. Your registration data, account data, ID data, trade data, and technical data will be deleted 5 years after you delete your account.

4.5. In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the period we need to access the data for the provision of services, receiving payment, resolving your customer support issue or other issues or for any other auditing or legal reasons.

4.6. Notwithstanding the other provisions of Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. Your Rights

5.1. In Section 5, we have summarised the principal rights. Some of the rights are complex, might contain restrictions depending on the legal basis for processing the data and not all of the details have been included in our summaries.

5.2. Your principal rights are:

(a) the right to access;

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data. Providing the rights and freedoms of others are not affected, we will supply you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can ask for your personal data by contacting our customer support.

(b) the right to rectification;

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

(c) the right to erasure;

You have the right to the erasure of your personal data. We have described our policy for retaining and deleting personal data above in Section 4.

(d) the right to object to processing;

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

(e) the right to data portability;

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would

adversely affect the rights and freedoms of others.

(f) the right to complain to a supervisory authority;

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. (g) the right to withdraw consent.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

5.3. Without prejudice to the aforementioned, if we have reasonable doubts concerning the identity of a user exercising his/her rights referred to in Section 5.2 or if we otherwise due to security reasons deem it necessary, we may request the provision of additional information and otherwise use all reasonable measures necessary to confirm the identity of the user.

5.4. You may exercise any of your rights in relation to your personal data by contacting our customer support. Concerning "Right to erasure" users are also able to request the deletion of their account through our site.

6. Cookie Policy

(a) What are cookies

As is common practice with almost all professional websites, this site uses cookies, which are tiny files that are saved to your web browser, to improve your experience and to enable certain features, such as authentication. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored, however, this may downgrade or 'break' certain elements of the sites functionality. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will

remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

(b) Cookies that we use

If you create an account with us then we will use cookies for the management of the signup process, for general administration and for preventing abuse and misuse of our services.

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

When you submit data through a form such as those found on contact pages or comment forms, cookies may be set to remember your user details for future correspondence. In order to provide you with a great experience on this site, we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences, we need to set cookies so that this information can be called whenever you interact with a page that is affected by your preferences.

(c) Managing cookies

You can prevent the setting of cookies by adjusting the settings on your browser. Disabling cookies will result in disabling all functionality and features of this site. Therefore it is recommended that you do not disable cookies.

7. How to Contact Us

7.1. If you have any questions about this Privacy Policy, please, use the feedback form at the bottom of the page <https://blockchain.mn> .