

PRIVACY POLICY

LAST UPDATED: 3th day of July 2018

CoinPip Pte Ltd (“CoinPip”) takes your privacy very seriously. We ask that you read this privacy policy (the “Policy”) carefully as it contains important information about what to expect when CoinPip collects personal information about you and how CoinPip will use your personal Data.

The Policy applies to information we collect on www.coinpip.com and its sub-domains about:

- (i) visitors to our website (the “Site”) and
- (ii) people who register their emails with us

By using the following Privacy Policy, we would like to inform you about the nature, scope and purpose of the collection and use of your personal data by CoinPip Pte. Ltd., a private company with limited liability, incorporated under the laws of Singapore, having its corporate seat in Singapore with UEN 201402300N (hereinafter also referred to as “we”) by using our website www.coinpip.com (hereinafter referred to as “Website”):

CoinPip Pte. Ltd. gathers, uses and saves your personal data within the scope of the directions of the EU data protection regulation (GDPR). Personal data pertains to individual information on personal or factual circumstances of an identified or identifiable natural person.

1. Responsible Department to contact

The responsible department for the collection, processing and use of personal data within the meaning of the EU data protection regulation (GDPR) is CoinPip Pte. Ltd. You can contact us and our data protection officer at any time:

E-Mail: hello@coinpip.com

As far as the user has provided us with personal data (e.g. via the contact form), we will store and use the provided data for the user’s request. The user may object to the collection, processing or use of his personal data by CoinPip in accordance with this Privacy Policy in whole or for individual measures at any time by sending an e-mail to the above contact information.

2. Collection and processing of data on our Website

With every access to our Website or our App, usage data are transmitted through the respective internet browser and stored in log files, the so-called server log files. The records stored in this case contain the following data: date and time of retrieval, page name, IP address, referrer URL (i.e. the page you have previously visited), the amount of data transferred, as well as the product and version information of the browser used. We use the log data and log files only for statistical evaluations for the purpose of operation, security and optimization of our offer. Our site contains links to other websites. This privacy policy applies to this website only. In addition, if CoinPip's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers, and will be passed on to the new owners of the business.

3. Transactions

For the purpose of the use of our services and on the legal basis of Art. 6 para. 1 lit. b) GDPR, we process your personal data to perform transaction and/or perform due diligence with third parties.

4. Newsletter (CoinPip Updates)

With our newsletter we inform you about ourselves and our offers. To register for the newsletter, we need your e-mail address. In addition, we record your IP address and the date of registration upon registering to ensure that no third party misuses your e-mail address and hereby logs in without your knowledge to receive the newsletter.

This data is stored and used for the sending of the newsletter. On the basis of Art. 6 para. 1 lit. of GDPR, we use the component Intercom, headquartered at 55 2nd St. San Francisco, CA 94105, USA.

By registering for our newsletter, your e-mail address, IP address and date of registration will be transmitted to and stored by a server of Intercom in the USA.

Pursuant to Commission Implementing Decision (EU) 2016/1250 of 12.07.2016, the transmission of data from a controller or processor in the EU to US organizations self-certifying to the US Department of Commerce to comply with the Framework Principles of the United States Department of Commerce US- US Privacy Shields, including the Additional Principles, are permitted. Intercom has committed to upholding these principles through self-certification with the US Department of Commerce. After registering, you will receive an e-mail to confirm your affiliation to the newsletter e-mail list.

At the end of each newsletter, there is a link through which you can unsubscribe from the newsletter at any time. Upon cancellation of the newsletter, the personal data provided for the purpose of providing of the newsletter have been deleted, unless a statutory retention requirement precludes this.

When you register your emails with us, we may use it for the following:

- Send you newsletters, contact you about products and services we think may be of interest to you.
- Transactional emails to keep you updated on the status of your account.

You can revoke your consent to the storage of data, the e-mail address and their use for sending the newsletter at any time. The revocation can via a link in the newsletter itself or by message to the in Paragraph 1 mentioned contact options.

5. Use of our own Cookies

For a part of our service it is necessary for us to insert cookies. A cookie is a small text file which is saved by your browser on your device. Cookies are not inserted to execute programs or to load viruses into your computer. Instead the main purpose of cookies is to provide a product or service especially tailored to yourself and to make use of our services as time-saving as possible.

We use our own cookies in particular:

- For log-in identification;
- For load distribution;
- To store your language settings;

To note that information placed on our website has been displayed to you – so that on your next visit to the website it does not need to be displayed again.

In this way we wish to enable you to use our website in a convenient and individual way. These services are based on our foregoing legitimate interest, and the legal basis is Art. 6, para. 1 lit. f) GDPR.

We further use cookies and comparable technologies (e.g. web beacons) of partners for analytical and marketing purposes. This is described more precisely in the following sections.

6. Web Tracking, Analytics and Marketing

Our Website and our App uses cookies on the basis of Art. 6 para. 1 lit. f) GDPR in order to provide personalized functions and to be able to analyze your use of the website. A cookie is a file that is stored on the user's access device (PC, tablet, smartphone, etc.) It stores certain information related to the device. If our website is accessed by the respective device, the server of our website contains cookies. The server can evaluate the information stored in the cookie in several ways. Cookies can be used inter alia for advertisements, which can be adapted to the user behavior due to the cookies, and statistical data from website usage can be recorded.

Collected Data includes:

- The IP address of your device,
- The date and time of the access,
- The identification number of a cookie,
- The device identification of mobile devices
- Technical information on the browser and the operating system

In the following descriptions of the technology which we employ you will find instructions on how to object to our analysis procedures and advertising campaigns by means of a so-called opt-out cookie.

Please note that after the deletion of all cookies in your browser or the later use of another browser and/or profile, another opt-out cookies must be placed.

In the following paragraphs we describe the ways in which you can object to our analysis processes and advertising campaigns. Alternatively you can exercise your objection through settings to that effect on two websites: Truste or Your Online Choices, which provide objection facilities by many advertisers in bundled form. Both sites make it possible to disable all advertisements at once for the providers listed, using opt-out cookies, or alternatively to make the settings for each provider individually.

Occasionally, we may include third-party content on our site, such as videos from YouTube, Maps from Google Maps, RSS feeds or graphics from other websites. In order to display the content, the providers of this content perceive the IP address of the users. We have no influence on storage and further use of the IP address by the third providers.

Google Analytics

We use in our Website and our App on the basis of Art. 6 para. 1 lit. f) GDPR Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses cookies, text files that are stored on your computer and that allow an analysis of the use of the website by you. The

information generated by the cookie about your use of this website is usually transmitted to a Google server in the US and stored there.

Google has committed itself to self-certification by the US Department of Commerce to adhere to the framework of the EU-US Privacy Shield.

However, if IP anonymization is enabled on this website, Google will truncate your IP address beforehand within member states of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the US and shortened there. IP anonymization is active on this website. On behalf of CoinPip, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide other services related to website activity and internet usage to the website operator.

The IP address transmitted by Google Analytics within the framework of Google Analytics will not be merged with other data provided by Google. You can prevent the storage of cookies by setting your browser software accordingly; however, we point out that in this case you may not be able to use all functions of this website in full. In addition, you may prevent the collection by Google of the data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading the browser plug-in available under the following link and install:

<http://tools.google.com/dlpage/gaoptout?hl=de>

Google DoubleClick

Our website uses DoubleClick by Google, a service of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). DoubleClick uses cookies and similar technologies to present you with advertisements which you may find relevant. The use of DoubleClick enables Google and its partner websites to insert advertisements on the basis of previous visits to our or other websites on the internet. The data accrued in this context may be transmitted for evaluation to a server in the USA and stored there. Should personal data be transmitted to the USA, Google has acceded to the EU-US Privacy Shield.

You can (as set out above) prevent the storage of cookies by adjusting your browser to that effect; we must point out, however, that in this case you may not be able to all the functions of this website in full. You can further prevent the capture of the data generated by the cookies and relating to your use of the website, and prevent Google from processing these data, by downloading and installing the browser plug-in for DoubleClick disablement. As an alternative to the browser plug-in or within browsers on mobile devices you can deactivate the button "Personalised advertising" in Google's Advertising settings. In this case Google will only display general advertising, which has not been selected on the basis of information captured about you.

Your will find more detailed information on this matter on Google's Privacy Statement.

Jetpack/ WordPress stats

We use on our Website and our App Jetpack on the basis of Art. 6 para. 1 lit. f) GDPR. Jetpack is a visitor access statistics evaluation tool provided by Automattic, Inc. 132 Hawthorne Street, San Francisco, CA 94107, USA, using the tracking technology of Quantcast Inc., 201 3rd St, Floor 2, San Francisco, CA 94103-3153 , USA is operated. WordPress.com-Stats uses so-called "cookies", text files that are stored on your computer and that allow an analysis of the use of the website by you. The information generated by the cookie about the use of this website is stored on a server in the USA. The IP address is anonymized immediately after processing and prior to its storage. You may refuse the use of cookies by selecting the appropriate settings on your browser software; However, we point out that in this case you may not be able to use all the features of this website in full. You can survey and use the data through Quantcast with effect for the future, by placing an opt-out cookie in your browser by clicking on the link "Click here to opt-out": <http://www.quantcast.com/opt-out>. If you delete all cookies on your computer, you must set the opt-out cookie again.

WordPress has committed to self-certification with the US Department of Commerce to uphold the principles of the US-US Privacy Shield. Further information on the privacy of WordPress can be found at:

<https://wordpress.org/about/privacy>

Intercom

On the basis of Art. 6 para. 1 lit. f) GDPR, we use Intercom, headquartered at 55 2nd St. San Francisco, CA 94105, USA for sending messages in sales and after-sales service. Intercom is a customer service tool for communicating with customers. Your personal data (name, e-mail address, possibly provided documents) will be transmitted on Intercom's servers in the USA and stored there.

Intercom has committed itself to self-certification with the US Department of Commerce to uphold the principles of the EU-US Privacy Shield. Further information on the privacy of Intercom can be found at:

<https://www.intercom.com/de/terms-and-policies>

7. Transmission of Data

Data which we have collected are passed on only if:

- You have given an express declaration of consent for this, pursuant to Art. 6, Paragraph 1, Clause 1, Point (a) of the GDPR,
- Further transmission is necessary, pursuant to Art. 6, Paragraph 1, Clause 1, Point (f) of the GDPR, for bringing, exercising or defending legal claims, and no reason exists to suppose that you have a predominant and properly protected interest in preventing your data from being passed on,
- We have a legal duty to pass on your data pursuant to Art. 6, Paragraph 1, Clause 1, Point (c) of the GDPR, or
- This is legally permissible and requisite, pursuant to Art. 6, Paragraph 1, Clause 1, Point (b) of the GDPR, for the handling of contracts with yourself or for the execution of pre-contractual actions which are being carried out at your request.

A part of the data processing can be handled via service providers. Along with the service providers stated in this Data Protection Notice, these may include in particular computer centres which store our website and databases, IT service providers which maintain our systems, and consultancy firms. Should we pass data on to our service providers, these data may only be used for performance of their tasks. We select and commission these service providers carefully. They are bound contractually to follow our instructions, have suitable technical and organisational measures for the protection of the rights of data subjects, and are monitored by ourselves on a regular basis.

Further transmission may also be made in connection with requests by government authorities, decisions of the courts and legal proceedings if it is necessary for prosecution or execution at law.

Amazon Web Services

Some of your data will be processed on servers which are provided by Amazon Web Services, a service of Amazon Web Services Inc., 410 Terry Avenue North, Seattle, Washington 98109, USA ("AWS"). Via these AWS servers your device will be connected with the contents in our website. The servers which we use are normally located inside the European Union. For technical reasons, however, portions of your data may be processed outside the European Economic Area, particularly in the USA. To ensure the protection of your data in this case too, AWS participates in the EU-US-Privacy-Shield. In addition, we have concluded a contract with AWS which meets the requirements stipulated by the standard clauses of the European Commission. The legal basis is Art. 6, Paragraph 1, Clause 1, Point (f) of the GDPR, grounded

on our legitimate interest in storing the contents of our website securely and reliably through external service providers while reducing our own expenditure of resources for the provision of our website's EDP infrastructure.

Google Tag Manager

Our website uses Google Tag-Manager, a service of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Tag Manager serves to administrate tracking tools and further services, so-called website tags. A tag is an element placed in our website's source text, in order for instance to capture prescribed usage data. Google Tag Manager operates without the use of cookies. Google Tag Manager ensures that the usage data required by our partners (Cf. the data-processing operations set out above) are passed on to them. Some of the data are processed on a Google server in the USA. Should personal data be transmitted to the USA, Google has acceded to the EU-US Privacy Shield. The legal basis is Art. 6, Paragraph 1, Clause 1, Point (f) of the GDPR, grounded on our legitimate interest in incorporating and managing a number of tags in an uncomplicated way on our website.

You will find more detailed information in Google's information on tag manager.

8. Your Rights

You have the right at any time to require us to provide information about the processing of your personal data (right of access). When providing you with this information we shall explain the data processing and supply an overview of the data relating to your person which are stored. Should data stored with us be inaccurate or no longer up-to-date, you enjoy the right to have these data corrected (right to rectification). You can also require the erasure of your data (right to erasure or right to be forgotten). Should the erasure exceptionally not be possible due to other legal regulations, the data processing will be restricted, so that in future they are only available for this statutory purpose. You can also have the processing of your data restricted, i.e. if you believe that the data which we have saved are not correct (right to restriction of processing). You also have the right of data portability, i.e. that we send you on request a digital copy of the personal data which you have provided (right to data portability).

To exercise your rights as set out here, you can communicate with the foregoing contact details at any time. This also applies should you wish to receive copies of guarantees for certification of an adequate data-protection level.

You also have the right to object to the data processing based on Art. 6, para., lit. f) of the GDPR. Finally, you have the right to complain to the regulatory authority to which we are subject. You can exercise this right at a regulatory authority in the member country of your place of residence, of your workplace, or of the place of alleged breach.

Under Article 7, para. 3 of the GDPR you have the right at any time to withdraw to us any consent which has been given previously. This will have as a consequence that in future we no longer continue the data processing based on this consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Insofar as we process your data on the basis of legitimate interests under Art. 6, para. 1, lit. f) GDPR, you have the right under Art. 21 GDPR to object to the processing of your data and to mention grounds relating to your particular situation that in your opinion speak in favour of prevailing legitimate interests.

According to Art. 15 GDPR, you have the right to obtain free information upon request about the personal data that has been stored about you. Additionally, you have the right to correct incorrect data as well as to block and delete personal data. Any request for your personal data, please direct to the imprint of our website or under Paragraph 1 e-mail address or address stated in this privacy policy.

Each interested party has the right to lodge a complaint with a data protection supervisory authority about the processing of data when using the website.

9. Duration of storage and routine deletion

Subject to the exceptions referred to in sections 21(2) of the Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore, we store personal data only for as long as is necessary to fulfil contractual or statutory duties for which the data were collected. We then erase the data immediately, unless we still need these data until expiry of the statutory period of limitation for purposes of evidence in civil claims or due to statutory duties of storage.

For purposes of evidence we must still store contact data for three years from the end of the year in which business relations with you end. Any claims will expire, under the normal statutory period of limitation, no earlier than at this time.

Thereafter we must also store some of your data for purposes of book-keeping. We have an obligation to do so under statutory duties of documentation.