

#### PRIVACY POLICY

### Version / Last Updated: January/2022

This Privacy Policy governs the manner in which Anny.trade collects, uses, maintains and discloses user information ("User") from https://anny.trade ("Site"). This privacy policy applies to the site and all products and services offered by MECABOTS.

#### Personal identification information

We may collect personally identifiable information from Users in a variety of ways, including, but not limited to, when Users visit our site, filing an application to subscribe to the newsletter and in connection with other activities, services, resources or services, resources we make available on our site. Information requested from users may be, as appropriate: Name, email address, mailing address, telephone number, users may, however, visit our site anonymously.

We will collect personally identifiable information from Users only if Users voluntarily submit such information to us. Users may always refuse to provide personally identifiable information, except that such information may prevent them from participating in certain activities related to the Site.

### Non-personal identification information

We may collect non-personally identifiable information about Users whenever they interact with our Site. Non-personally identifiable information may include the browser name, computer type, and technical information about your means of connecting to our Site, such as your operating system and Internet service providers, and other similar information.

# How we use your Personal Data

To the fullest extent permitted under applicable under Data Protection Laws, we use your information to:

- Provide any information or Services that you have requested or ordered;
- Compare information for accuracy and to verify it with third parties;
- Provide, maintain, protect and improve our Services;
- Manage, monitor, and administer your use of the Services and provide an enhanced, personal, user experience;
- Manage our relationship with you (for example, customer services and technical support activities);



- Undertake internal testing of the Services or systems to test and improve their security and performance (in these circumstances, we would de-identify any information used for such testing purposes);
- Provide you with any information that we are required to send you to comply with our regulatory or legal obligations;
- Comply with applicable Know Your Customer, Anti-Money Laundering, Counter-Terrorism Financing, and Anti-Corruption laws and regulations;
- Detect, prevent, investigate or remediate, crime, illegal or Prohibited Activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes);
- Contact you to see if you would like to take part in our customer research (for example, feedback on your use of our Services);
- Monitor, carry out statistical analysis and benchmarking (provided that in such circumstances it is on an aggregated basis which will not be linked back to you or any living individual);
- Deliver advertising, marketing (including but not limited to in-product messaging) or information that may be useful to you;
- Deliver joint content and services with third parties with whom you have a separate relationship (for example, social media providers); and
- To send periodic emails
- The email address users provide for order processing will only be used to send information and updates related to their order. It can also be used to answer your questions and/or other requests. If you choose to accept our mailing list, you will receive emails that may include news, updates, product or service related information, etc. If at any time you wish to unsubscribe from future emails, we will include instructions on how to unsubscribe at the bottom of each email or you may contact us via our website.

In addition to the legal and commercial uses listed above, we may be required to provide any and all of your Personal Data to governmental authorities as necessary to comply with the law. To the extent required by Data Protection Laws, or where we have a legitimate and lawful purpose for doing so, we retain information about you after your withdrawal of funds through the Services, the closure of your Account, if the registration of an Account is declined or if you decide not to proceed with the registration of an Account.

# How we protect your information

We have adopted appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

The exchange of confidential data between the Site and its Users takes place via a secure SSL encrypted communication channel protected with digital signatures.



#### **Data Retention**

We will retain your Personal Data for as long as it is necessary for the purposes of performing a contract, complying with our legal and regulatory obligations, and protecting our legitimate interests. Specifically, we reserve the right to retain your Personal Data for the purposes of complying with applicable Know Your Customer, Anti-Money Laundering, Counter-Terrorism Financing, and Anti-Corruption laws and regulations for a period of at least seven (7) years, and for the purposes of legal proceedings, complaints and disputes for as long as this is necessary to protect our legitimate interests.

Persons who may access your Personal Data:

Anny.trade authorized personnel, including but not limited to our Compliance Officers, shall have access to your Personal Data on a need-to-know basis. Our Compliance Officers and other authorized personnel are bound to confidentiality and non-disclosure agreements and subject to strict company policies related to the access and use of the data.

We may engage from time to time to third-party service providers to assist Anny.trade with the implementation of the KYC/AML & CTF Policy as well as the compliance with applicable Know Your Customer, Anti-Money Laundering, Counter-Terrorism Financing, and Anti-Corruption laws and regulations. Where applicable, we will enter into a data processing agreement with these third-parties to ensure data security and protection of your Personal Data against Data Beaches. Such Data Processors will only process your Personal Data to the extent required for the provision of services for which they are engaged.

We may provide your Personal Data to competent authorities upon their request to the extent legally required or to the extent necessary to defend our rights in legal proceedings or investigations.

# **Data Security**

To protect your Personal Data, Anny.trade takes all reasonable precautions and follows the best practices of the industry to prevent the loss, misuse, improper access, disclosure, alteration or destruction of the same.

Legal basis for processing in the EU:

In the EU, we collect your Personal Data for the following purposes:

- Based on your consent, for marketing purposes, which can be revoked at any time;
- Where necessary to perform any contract we enter into, or have entered into, with you to provide Services or provide access to our Services;
- Where necessary for our legitimate business interests (or those of a third party) when your interests and fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation either in the EU or elsewhere.



#### You have the following rights:

- The right to access your own Personal Data;
- The right to have your Personal Data rectified if it is inaccurate or incomplete;
- The right to request deletion or removal of your Personal Data where there is no good reason for processing to continue;
- The right to restrict processing of your Personal Data where there is no good reason for processing to continue;
- The right to data portability to enable moving, copying or transferring of Personal Data from one platform to another;
- The right to object to the processing of your Personal Data in certain circumstances; and
- Rights relating to profiling and automated decision making resulting from the processing of your Personal Data.

The exercise of these rights is personal and therefore must be exercised directly by the interested party, requesting it directly to Anny.trade, which means that any Customer, user, subscriber or collaborator who has provided their data at any time can contact Anny.trade and request information about the data that it has stored and how it has been obtained, request the rectification of the same, request the portability of your Personal Data, oppose the processing, limit its use or request the cancellation of that data in Anny.trade files.

To exercise the rights of access, removal, rectification, cancellation, portability and opposition, you must send an email to the Data Protection Officer of Anny.trade (legal@anny.trade) together with a valid proof of identity such as a Government-issued ID document.

# Accuracy and veracity of Personal Data

You agree that the information provided to Anny.trade is correct, complete, accurate and current. You are solely responsible for the veracity and correctness of the data you submit when accessing and/or using the Services, exonerating Anny.trade from any responsibility in this regard.

Acceptance and consent

You declare to have been informed of the conditions on the protection of Personal Data, You accept and consent to the treatment of the same by Anny.trade in the manner and for the purposes indicated in this Privacy Policy.

# Revocability

To exercise the rights of access, removal, rectification, cancellation, portability and opposition, you must send an email to <a href="legal@anny.trade">legal@anny.trade</a> along with your valid proof of ID such as a Government-issued identification document. The exercise of your rights does not include any Personal Data that Anny.trade is obliged to keep for administrative, performance of contracts, legal or security purposes.



### **Change of Operatorship**

In case of incorporation, acquisition, merger or any other causes that cause the change of Operatorship of the Services, you expressly consent that your registration data and information are transferred by Anny.trade to the new Operator. When and if this occurs, Anny.trade will comply, in any case, with the duty of information to you.

#### Parties with whom we may share your Personal Data

We may share your Personal Data with:

Third-Party Internet and Marketing Services Vendors including but not limited to SendGrid, Active Campaign, Facebook, Twitter, Discord, Telegram, GoogleCloud, Google Analytics;

Government and State Authorities to respond to subpoenas, court orders, legal process, law-enforcement requests, legal claims, or government inquiries and to protect and defend the rights, interests, safety, and security of Zignaly, our affiliates, Customers, or the public;

#### Web browser cookies

Our site may use "cookies" to improve the user experience. The user's web browser places cookies on the hard drive for record-keeping purposes and sometimes tracks information about them. You may choose to set your browser to refuse cookies or to alert you when cookies are being sent. If they do, note that some parts of the site may not function properly.

# **Third-Party Sites**

Users may find advertising or other content on our site that links to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by the linked sites from our site. Additionally, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Navigation and interaction on any other site, including sites that link to our Site, is subject to the site's own terms and policies.

# **Advertising**

Ads appearing on our site may be delivered to users by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they submit an online advertisement to compile non-personally identifiable information about you or others who use your computer. This information allows ad networks to deliver, among other things, targeted ads that they think are of most interest to you. This privacy policy does not cover the use of cookies by any advertiser.



### Changes to this privacy policy

Anny.trade has the power to update this privacy policy at any time. When we do, review the updated date at the bottom of this page. We encourage Users to frequently check this page for changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to periodically review this privacy policy and to be aware of any modifications.

#### Your acceptance of these terms

By using this Site, you signify your acceptance of this policy and terms of service. If you do not agree to this policy, please do not use our site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

#### Contacting us

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at:

Anny.trade Amsterdam support@anny.trade