

PRIVACY POLICY

RINGFINANCIAL OÜ

The purpose of this Privacy Policy (hereinafter referred as "Policy") is to inform you as to what information may be collected by RINGFINANCIAL OÜ (registry code 14716908, registered under the laws of the Republic of Estonia under address Harju maakond, Tallinn, Kesklinna linnaosa, Viru väljak 2, 10111) (hereinafter referred to as „We“, „Us“, „Joys“ or „Our“) from you when you visit our website, mobile application or other interactive platforms and/or any services are provided through them by Joys to you. Hereby we provide you with information about how the collected information will be used by us, with whom such information may be shared and about your choices and rights regarding the processing of your personal data.

By accessing in any way or registering your account on our webpage, mobile application or other Joys's interactive platforms and/or submitting your personal data to us, you agree and give your consent to us for collecting, storing, using, disclosing and processing your personal data in any way necessary. If you do not agree with Joys processing your personal data YOU SHOULD IMMEDIATELY STOP USING JOYS's webpage, mobile platform, other interactive platforms or the provided services in general. Despite on any subjective disagreements you might have in regards to Joys processing your personal data, your continuous use of the abovementioned services will act as continuous your consent.

Joys reserves the right, at its sole discretion, to amend, change, modify, add or remove portions of the Privacy Policy regulation, at any time. Changes to the regulation will become effective immediately after they have been disclosed in Joys's interactive platforms (webpage, mobile application etc). Concluding the hereby Privacy Policy regulation you agree that it's your responsibility to check them periodically for changes. After disclosing the changed version of the Privacy Policy, your continued use of Joys's webpage, mobile application and/or Joys's services in general, constitute that you agree and comply with the changes in Privacy Policy.

1. Data collection

1.1. On various occasions you may be asked by Joys to provide us with certain types of personal data, such as:

- 1.1.1. first and last name;
- 1.1.2. identification code;
- 1.1.3. phone number;
- 1.1.4. username (login) and password (and/or PIN-code) data in Joys interactive platforms;
- 1.1.5. citizenship;
- 1.1.6. e-mail address;
- 1.1.7. cryptocurrency related addresses;
- 1.1.8. personal data you choose to provide;
- 1.1.9. personal data we are obliged to obtain from you in accordance with our KYC and AML policies;
- 1.1.10. any other necessary relevant data.

1.2. We hope that you will provide us with the abovementioned personal data. However, if you do not want to disclose your personal data to us, please do not submit it. This means that in some cases we will not be able to provide you with the services that you have requested from us.

1.3. In addition to the personal data mentioned above, we may additionally collect data from and about you that does not classify as personally identifiable data and (such as: IP address, browser type, domain name, the date and time of visits to our interactive platforms, computer settings, geolocation data or data collected when you use our software).

2. Processing purposes

2.1. The purpose of Joys asking, collecting and in any way processing the abovementioned personal data is the following:

- 2.1.1. identifying the user;
- 2.1.2. provide you with the access to digital assets;
- 2.1.3. understand and meet your needs and preferences;
- 2.1.4. develop new and enhance existing service and product offerings;
- 2.1.5. manage and develop our business and operations;
- 2.1.6. carry out any purposes for which we have received your consent;
- 2.1.7. to provide the user with the purposeful services of the mobile platform;
- 2.1.8. sending notifications to the client, contacting and communicating with the client regarding the fulfillment of obligations set forth in these terms and conditions;
- 2.1.9. to improve our services;
- 2.1.10. analyzing trends, usage and activities in connection with our interactive platforms;
- 2.1.11. fulfilling Joys's obligations stipulated by law.

2.2. Non-personally identifiable data mentioned is collected and processed for the purposes stipulated in clauses 2.1.10 and to improve the functioning of Joys's interactive platforms in their technical perspective and thereof to provide our customers with better services.

2.3. Personal information collected will be processed for direct marketing (service offers via e-mail etc) will be processed in this manner only once received your separate consent which enables us to do so.

3. Processing and storing

3.1. Joys will process the collected data only for the purposes mentioned in the hereby Privacy Policy legally and fairly making sure, as much as reasonably possible, that the personal data collected is up to date and correct.

3.2. You understand that, at some cases, your data might be processed and stored by our counterparties from whom we order services from. All such third parties will be contractually bound to protect your data in compliance with our policy.

3.3. All collected data will be stored to Joys's safe and secure locations in accordance to reasonable applicable criterias stipulated by the applicable law. We take regular reasonable measures to ensure and improve the security of our data storages and processing activities.

3.4. Unfortunately no data transmissions or processing activities over the internet can be 100% secure and while we strive to protect your personal data, we cannot guarantee or warrant its complete security.

3.5. Due to inability to guarantee the absolute security of data processing, we take no liability for losses and damages that you or any other third party may suffer as a result of a breach to your personal data. Disclosing any data to us will take place at your sole liability.

3.6. You agree to not hold us and our respective past, present and future employees, officers, directors, contractors, consultants, advisers, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns liable for any loss or damage of any sort incurred as a result of processing your personal data.

4. Disclosure of data

4.1. Collected data will not be disclosed to third parties without your prior consent, unless the obligation to Joys to provide such information to third parties comes directly from the applicable laws or is imperatively necessary to provide you with the requested services.

4.2. Joys will only disclose your personal data under the following basis and for the following reasons:

- 4.2.1. with your consent and/or at your instructions;
- 4.2.2. with Joys's current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with us or our offices internationally;
- 4.2.3. with third parties or service providers that perform work for us in order for us to provide services for you;
- 4.2.4. analytics and search engine providers that assist us in the improvement and optimization of our interactive platforms;
- 4.2.5. it is necessary to identify, contact or bring legal action(s) against you or other persons and entities who may be causing harm to you, us, or others;
- 4.2.6. to fulfill Joys's obligations stipulated in the law.

5. Data subject rights

5.1. You as a data subject have the following rights regarding the collection, processing and disclosing your personal data:

- 5.1.1. to ask Joys not to contact the client in the future (withdraw direct marketing consent);
- 5.1.2. to ask for a copy or transfer of your personal data;
- 5.1.3. to ask to correct, update or delete the client's personal data.

5.2. You can execute your abovementioned rights by contacting Joys via e-mail user-support@joysdigital.ee or through our support service functions made available at our interactive platforms (webpage, mobile application).

6. Deletion of data

6.1. Among other, your data will be deleted at the following occasions:

- 6.1.1. deletion of your account;
- 6.1.2. at your request, but will affect the ability to provide services;
- 6.1.3. at part or at its entirety when the data does not serve its processing purposes;

6.2. Joys deems it necessary to emphasize that even at cases mentioned under clauses 6.1.1 and 6.1.2 some or entirety of the collected data might not be immediately deleted when Joys has a direct legal obligation or overwhelming interest to protect its rights (accounting, KYC and AML purposes).

7. Cookies

7.1. Joys will also use cookies on its webpage and/or mobile application. The scope of the features used in regards to the cookie use, depends whether you are visiting our homepage or actually logged into to your account in our mobile platform.

7.2. As a webpage cookie feature we use a random session identifier, we do not collect any of your personal data. On our mobile application the cookies are used to store your following data into your devices: session ID, location city, name, phone number, birthday, e-mail and payment history.

7.3. The cookies and the cookie features implied by Joys serve the purpose to improve Joys's services and security in regards to the services, also at some aspects to conduct analysis, improve functionality and reliability of our mobile application.

8. Third-party links

8.1. Joys's webpage or mobile application may include external links to third party websites. These sites may have their own privacy policy regulations. When you are closing your personal data to those sites, it will be governed by their policy without any possibility of Joys's interference. Thus we advise you, before using any other external websites, get acquainted with their internal regulations (Terms and Agreements, Privacy Policy etc).

8.2. Our interactive platforms may offer social sharing features, links to social media and other integrated tools. You use of such features enables the sharing of information with your contacts and/or the public. Please visit the privacy policies of the entities that provide these features to obtain more information about the purposes and scope of data collection and the processing of such data by those entities.

9. Protection of children

9.1. Joys's website, mobile application and other interactive platforms are ment and targeted for people at least 18 years of age. We do not knowingly collect, use or disseminate any personal data from children. If, however, we become aware that personal data regarding children under the age of 18 has been collected, we will make reasonable efforts to delete it from our records.

10. Contacts

10.1. Regards to any questions, demands, claims or inquiries about your personal data processing by Joys, please contact Joys via e-mail user-support@joysdigital.ee or through our support service functions made available at our interactive platforms (webpage, mobile application).