

## Privacy Policy

This Privacy Policy will explain how our Company uses the personal data we collect from you when you use our website.

At Soken we highly prioritize protecting your personal information and being transparent about what we do with it. We are committed to using your personal information following all applicable laws concerning the protection of personal information and ensuring that you understand your data rights and freedoms.

Soken will be considered as the "controllers" of your data. We determine which personal data we need to process and for what purpose and are responsible for the safe storage and handling of this data.

First, we need to define, and it is important for you to understand, the expression: **"Personal Data" (PD)**. It generically represents any kind of information about a physical person, whose particularities can lead, directly or indirectly, to its identification. Here you have, by way of example, but not limited to: name and surname, geographical address, any identification number, political orientation, sexual orientation, email address, any location information and any other online identifier such as the device used to access the Internet, IP address, or cookie information.

With regards of your agreement on collection and use of personal data, we have taken all the necessary technical measures to provide you with this detailed agreement, so you can have a crisp clear experience, from the first to the last interaction with our website or our services.

Visitors and Users agree and accept that the use of our website is not possible without any indication of personal data.

In your relationship with us through the website, controller, for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data

protection, is: Soken LLC a company incorporated in Canada, whose registered office is at 32 Britain Street, Toronto, ON, Canada.

This Policy does not apply to other companies' or Companies' websites to which we may link to or may link to us. You should carefully review the privacy policies of those sites in order to determine how they treat your personal information.

If you do not agree to this Privacy Policy, please exit, and do not access or use our website.

## Definitions

Our data protection policy should be legible and understandable for the general public, as well as for our Users and business partners. To ensure this, we would like to first explain the terminology used. In this data protection declaration, we use, inter alia, the following terms:

- **Data Subject or Data Principal** - is any identified or identifiable natural person, whose personal data is collected and processed by us.
- **Processing** - is any operation which is performed on personal data, such as collection, recording, Company, structuring, storage, etc.
- **Restriction of processing** - is the marking of stored personal data with the aim of limiting their processing in the future.
- **Profiling** - means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person.
- **Data Controller or Data Fiduciary** - is the natural or legal person, public authority, agency or other body, which determines the purposes and means of the processing of personal data;
- **Processor** - is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **Recipient** - is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed. The processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

•**Third-party** - is a natural or legal person, public authority, agency or body other than the ones above, who, under the direct authority of the controller or processor, are authorized to process personal data.

•**Consent** - is any freely given, specific, informed and unambiguous indication of data subject's acceptance to the processing of their personal data.

## **Compliance**

The processing of personal data will be in line with these main international legislations:

•**General Data Protection Regulation** (GDPR), applicable in Europe;

•**California Consumer Privacy Act** (2018) and Privacy Act U.S.C. 552a (Privacy Act of USA);

We are able to provide our services worldwide. For the purpose of avoiding any compliance conflict with any terminology used by any particular legislation, in this document: "Users" are the "data subjects" or the "data principals" and Soken is the "data controller" or "data fiduciary"

Our privacy notice tells you what personal data (PD) and non-personal data (NPD) we may collect from you, how we collect it, how we protect it, how we may share it, how you can access and change it, and how you can limit our sharing of it. Our privacy notice also explains certain legal rights that you have with respect to your personal data. Any capitalized terms not defined herein will have the same meaning as where they are defined elsewhere on our website.

## **Automated individual decision-making and profiling**

You will have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

## **Filing a complaint with authorities**

You have the right to file a complaint with supervisory authorities if your information has not been processed in compliance with any applicable data protection law. If the supervisory authorities fail to address your complaint properly, you may have the right to a judicial remedy.

## **Use Cases**

Please take a moment to understand which use case(s) set out in this Privacy Policy apply to you:

- Website Visitor

You are a “Website Visitor” by definition when you visit our website <https://soken.io/> and any other eventual subdomains associated with our principal domain. As a website visitor, we use your navigation statistical information for our own purposes, primarily for improving the use of our website and to provide you with more relevant content.

- User

You become a “User” if you submit an inquiry on our website/platform in order to benefit of our services. If you are a User, our primary purpose of using your personal data is for providing the products and services to you. We retain your personal information for a limited time and for limited purposes, such as to make it easier for you to re-join our service in the future or to wish you offers for services that we think you may be interested in.

## **What data do we collect?**

Upon acquisition of our services, we may ask for your full name and a valid e-mail address, which will be included in our mailing list, for future maintenance, updates, and eventual marketing promotions. In addition, we will ask you to provide us with secure payment data, which will be used for processing the order. This particular set of data will be legally processed by our payment processor, and will not be stored by us.

We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type, and version, operating system, referral source, length of visit, page views and

website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analyzing the use of the website and services.

We may process your personal data that are provided in the course of provision of our services ("service data"). The service data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

We may process information contained in any inquiry you submit to us regarding services and/or services ("inquiry data"). The inquiry data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

We may process information relating to our User relationships, including User contact information ("User relationship data"). The User relationship data may include your name, your employer, your job title or role, all your contact details, and information contained in communications between us and you or your employer. The User relationship data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

We may process information relating to transactions, including purchases of services, that you enter into with us and/or through our services ("transaction data"). The transaction data may include your contact details and the transaction details. The transaction data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the

purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

**"Automatically Collected" Information:** The website collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files, and it is collected regardless of your quality: Website Visitor or User.

Collected may be:

- the ISP,
- the operating system used by the accessing system
- the website from which an accessing system reaches our website (so-called referrers)
- the sub-website
- the date and time of access to the website
- an Internet Protocol address (IP address)
- screen Resolution
- locale Preferences
- web page visited before you came to our website
- information you search for on our website
- date and time stamps associated with transactions
- system configuration information and other interactions with the website.
- social networking information (if we are provided with access to your account on social network connection services);
- any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, we do not draw any conclusions about the data subject. Rather, this information is needed to:

- deliver the content of our website correctly;
- optimize the content of our website as well as its advertisement;
- ensure the long-term viability of our information technology systems and website technology;
- provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack;

In addition to the specific purposes for which we may process your personal data set out in this Section, 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.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

Obviously, the access to our website for website visitors is free; however, we inform you that for the use of the website via mobile device the charges and the standard tariffs provided in the service contract that you have stipulated with them will still be applied by the telephone operators.

### **How do we collect your data?**

You directly provide Soken with most of the data collected. We collect data and process data when you avail our products and services.

### **What is the purpose of collection?**

Our commercial purpose, by reference to the subject matter of our business, is provision of cryptocurrency services. Reports in the financial domain and other complementary services, and the new rules of personal data protection (GDPR, CCPA, etc.) are part of this context.

### **Complementary purposes**

To improve our services.

We always want to offer you the best online experience and for this we can collect and use certain information about your behavior and preferences when using the website and platform, or we can conduct market research directly or through partners.

To improve your marketing activity

We may want to keep you informed about the best offers for the services you may be interested in. In this sense, we may send you any type of message (such as: email / SMS / phone / mobile push / web push / etc.) containing general and thematic information about products or services, information on offers or promotions, as well as other commercial communications.

#### To defend our legitimate interests

There may be situations in which we use or transmit information to protect our rights and our commercial activity. These situations may include:

- measures to protect the website and platform Visitors and Users against cyber-attacks;
- measures to prevent and detect fraud attempts;
- transmission of information to the competent public authorities;
- other risk management measures.

We therefore commit ourselves:

- to protect the privacy of your data, which is a top priority for our company's management;
- to use this data for the sole purpose of providing you with a personalized experience on our website as well as on the online platforms that we promote our products and services (Facebook and Google, etc.).

#### **How do we store your data?**

Soken securely stores your data at third-party dedicated server located in Canada.

We do not use the information you provide to make any automated decisions that might affect you.

#### **Our Legal Basis for Collecting and Processing Personal Data**

Our legal basis for collecting and processing your personal data when you buy request our services is based on the necessity for the performance of a contract or to take steps to enter into a contract.



## What Happens If You Don't Give Us Your Personal Data

If you do not provide us with enough Personal Data, we may not be able to provide you with our services. However, you can access and use some parts of our website (not our platform) without giving us your Personal Data.

## What are your data protection rights?

Soken would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

**The right to be informed** – You have the right to be informed about the personal data we collect from you, and how we process it.

**The right to access** – You have the right to request Soken for copies of your personal data. We may charge you a small fee for this service.

**The right to rectification** – You have the right to request that Soken correct any information you believe is inaccurate. You also have the right to request Soken to complete the information you believe is incomplete.

**The right to erasure** – You have the right to request that Soken erase your personal data, under certain conditions.

**The right to restrict processing** – You have the right to request that Soken restrict the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to Soken's processing of your personal data, under certain conditions.

**The right to data portability** – You have the right to request that Soken transfer the data that we have collected to another Company, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us

- Email us at: [info@soken.io](mailto:info@soken.io)
- Call us at: +1 (416) 875-4174

## **Sharing Information with Affiliates and Other Third Parties**

We do not sell or rent your PD to third-parties for marketing purposes. You understand, and we undertake, that we will provide your PD through our platform strictly to the corporate stakeholders that are using our platform. However, for data aggregation purposes we may use your NPD, which might be sold to other parties at our discretion. Any such data aggregation would not contain any of your PD. We may provide your PD to third-party service providers we hire to provide services to us. These third-party service providers may include but are not limited to: payment processors, web analytics companies, advertising networks, call centers, data management services, help desk providers, accountants, law firms, auditors, shopping cart and email service providers, and shipping companies.

## **Retaining and Destroying Your PD**

We only retain the personal information collected from a User for as long as the User is active on our platform, or otherwise for a limited period of time as long as we need it to fulfill the purposes for which we have initially collected it, unless otherwise required by law. 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 2-year criteria, after your relationship with us ends.

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.

## **Cookies Policy**

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we will collect information from you automatically through cookies or similar technology

For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

## How do we use cookies?

Soken uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website
- To authenticate you

## What types of cookies do we use?

There are several different types of cookies, however, our website uses:

- o Functionality – Soken uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and the location you are in. A mix of first-party and third-party cookies are used. Soken uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed, and information about your browser, device, and your IP address.
- o Strictly Necessary cookies– let you move around the website and use essential features like secure areas. Without these cookies, we cannot provide the requested services. We use these strictly necessary cookies to:
  - o Identify you as being logged in to the website and to authenticate you
  - o Make sure you connect to the right service on the website when we make any changes to the way it works
  - o For security purposes
- o 'Performance' cookies – collect information about how you use the website, e.g. which pages you visit, and if you experience any errors. These cookies do not collect any information that could identify you and are only used to help us improve how the website works. We use performance cookies to:
  - Help us improve the website by measuring any errors that occur
  - Test different designs for the website

## **How to manage cookies**

You can set your browser not to accept cookies, [allaboutcookies.org](http://allaboutcookies.org) tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

## **Privacy policies of other websites**

The Soken website/platform contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

## **California Privacy Rights**

In addition to the rights provided for above, if you are a California or US resident, you have the right to request information from us regarding whether we share certain categories of your personal information with third parties for the third parties' direct marketing purposes. To the extent we share your personal information in this way, you may receive the following information:

- (a) the categories of information we disclosed to third parties for the third parties' direct marketing purposes during the preceding calendar year; and
- (b) the names and addresses of third parties that received such information, or if the nature of their business cannot be determined from the name, then examples of the products or services marketed.

Effective January 1, 2020, pursuant to the California Consumer Privacy Act of 2018 ("CCPA"), California residents have certain rights in relation to their personal information, subject to limited exceptions. Any terms defined in the CCPA have the same meaning when used in this California Privacy Rights section.

- For personal information collected by us during the preceding 12 months that is not otherwise subject to an exception, California residents have the right to access and delete their personal information. Soken will not discriminate against those who exercise their rights. Specifically, if you exercise your rights, we will not deny you services, charge you different prices for services or provide you a different level or quality of services.

- To the extent we sell your personal information to third parties, you also have the right to request that we disclose to you: (i) the categories of your personal information that we sold, and (ii) the categories of third parties to whom your personal information was sold. You have the right to direct us not to sell your personal information. Soken does not sell your personal information in its ordinary course of business and will never sell your personal information to third parties without your explicit consent.

Should Soken engage in any of the activities listed in this section, your ability to exercise these rights will be made available to you in your account settings. You can exercise your rights by going contacting us via email so that we may consider your request.

If you are a US resident, you may designate an authorized agent to make a request to access or a request to delete on your behalf. We will respond to your authorized agent's request if they submit proof that they are registered with the California Secretary of State to be able to act on your behalf, or submit evidence you have provided them with power of attorney pursuant to California Probate Code section 4000 to 4465. We may deny requests from authorized agents who do not submit proof that they have been authorized by you to act on their behalf, or are unable to verify their identity.

### **Transferring PD From the European Economic Area**

PD that we collect from you may be stored, processed, and transferred between any of the countries in which we operate. The European Union and the UK has not found the United States and some other countries to have an adequate level of protection of PD under Article 45 of the GDPR. Our company relies on derogations for specific situations as defined in Article 49 of the GDPR. For European Union customers and users, with your consent, your PD may be transferred outside the European Union to the United States and or other countries. We will use your PD to provide the services, and/or information you request from us to perform a contract with you or to satisfy a legitimate interest of our company in a manner that does not outweigh your freedoms and rights. Wherever we transfer, process or store your PD, we will take reasonable steps to protect it. We will use the information we

collect from you in accordance with our privacy notice. By using our website, services, or products, you agree to the transfers of your PD described within this section.

## **Data Processing Covenants**

### Roles and Customer responsibility

**Parties' Roles.** To the extent that Soken processes Personal Data in the course of provision of Services, it will do so as a Controller and in accordance with the requirements of the Service Agreement.

**Purpose Limitation.** Soken will process the Personal Data only for the purpose of providing the Services and in accordance with users's lawful instructions.

**Scope.** Within the scope of this Covenant and in its use of the services, the Controller shall be responsible for complying with the statutory requirements relating to data protection and privacy, but not regarding the disclosure and transfer of Personal Data to other Processors. For the avoidance of doubt, Controller's instructions for the Processing of Personal Data shall comply with the Data Protection Law, but subsequent Processors will bear direct responsibility towards the user, with regards to the data privacy compliance. This Covenant is the user's complete and final instruction to Soken in relation to Personal Data and that additional instructions outside the scope of this Covenant would require prior written agreement between the parties. Instructions specified in this Covenant and may, from time to time thereafter, be amended, amplified or replaced by Controller in separate written instructions (as individual instructions).

**Compliance.** Soken, as Controller, shall be responsible for ensuring that: a) it has complied, and will continue to comply, with all applicable laws relating to privacy and data protection, including EU Data Protection Legislation; and b) it has, and will continue to have, the right to transfer, or provide access to, the Personal Data to other processors, for processing in accordance with the terms of the Agreement and this Covenant.

## **Changes to Our Privacy Policy**

We reserve the right to change this privacy notice at any time. If our company decides to change this privacy notice, we will post those changes on our website so that our users and customers are always aware of what information we collect, use, and disclose. If at any time we decide to disclose or use your PD in a method different from that specified at the time it was collected, we will provide advance notice by email (sent to the email address on file in your account).

Otherwise we will use and disclose our users' and customers' PD in agreement with the privacy notice in effect when the information was collected. In all cases, your continued use of our website, services, and products after any change to this privacy notice will constitute your acceptance of such change.