

Terms and Conditions

We respect your privacy and are committed to protecting your privacy rights. Please take the time to read our Privacy Policy carefully. We want to be clear about how we use information, and about how you can protect your privacy. To ensure transparency, this Privacy Policy describes our information-handling practices when you access the LYNKEY and our Services, as both defined below.

If you have any questions, please feel free to contact us at support@lynkey.com

By using LYNKEY and/or our Services, including downloading one of our mobile Applications, visiting our Web, you signify acceptance to the terms of this Privacy Policy. Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below.

IF YOU DO NOT AGREE WITH THIS POLICY PLEASE LEAVE THE WEB, UNINSTALL MOBILE APPLICATIONS OR CEASE USING OUR SERVICES IMMEDIATELY.

1. Our Status

1. We will act as a data controller in relation to personal information about you that may be either provided by you or collected by us.
2. As a data controller, we will solely determine the purposes and means of the processing of your personal information.

2. How We Use Your Personal Information

1. **We never collect your private keys and never have access to your wallet because none of your private keys ever leave your web browser storage or local storage of your mobile phone.**
2. In this Section 2 we have set out:
 1. the general categories of personal information that we may process;
 2. the purposes for which we may process personal information; and
 3. the legal basis of the processing.
3. Please note that not all the information you provide to us is personally identifiable information according to the applicable law.
4. We may process information about your use of our Services (“usage data”). The usage data may include:
 1. your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and navigation paths, as well as information about the timing, frequency and pattern of your service use;
 2. your device number, device id or unique identifier, device type, and unique device token, operating system and applications used, application crash-data, application

- version, device identifiers such as IDFA (Identifier For Advertisers), Android ID (Android device), referrer URL (Playstore), Google Advertiser ID, device model;
3. cookies, local storage files.

The source of the usage data is our analytics tracking system and your usage of our Services. This usage data may be processed for the purposes of analysing the use of our Services. The legal basis for this processing is your consent and our legitimate interest, namely monitoring and improving the LYNKEY and our Services.

1. We may process your account data (“account data”). The account data may include your nickname, email address, your user ID (Ref ID), your **public** wallet address you generate through the LYNKEY, and, in case you provided us with, your photo.

The source of the account data is you and the LYNKEY (with the reference only to Ref ID). The account data may be processed for the purposes of providing you access to our Services, ensuring the security of the LYNKEY and our Services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is a performance of an agreement between you and us and/or taking steps, at your request, to enter into such an agreement.

1. We may process information contained in any enquiry you submit to us regarding the LYNKEY and/or our Services (“enquiry data”). The enquiry data may be processed for the purposes of responding to your enquiry, offering, marketing, correcting any deficiencies in the LYNKEY and/or Services and selling relevant services to you. The legal basis for this processing is a performance of an agreement between you and us and/or taking steps, at your request, to enter into such an agreement and our legitimate interest.
2. We may process information relating to our customer relationships, including customer contact information (“customer relationship data”). The customer relationship data may include your name, your nickname, your contact details (phone number, social media handle, email address or other social networks or messengers identifiers you use to communicate with us) and information contained in communications between us and you.

The source of the customer relationship data is you. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is our legitimate interest, namely the proper management of our customer relationships.

1. 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 your contact information (phone number, social media handle, email address or other social networks or messengers identifiers you use to communicate with us).

The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interest, namely the proper administration of the LYNKEY, our Services and business and communications with users.

1. We may process your transactions information when you interact with technically supported decentralized protocols, pools and/or blockchains and information you generate through the LYNKEY (“interaction data”). This data may include your transactions, requests, contributing your crypto assets to pools, participation in sale and/or distribution of Digital Assets through Launchpad or Launchpool and other details of your interaction with decentralized protocols, pools, blockchains or generated through the LYNKEY.

The source of this data is your activities at or through the LYNKEY. This data may be processed for the purposes of providing relevant Services to you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

1. We may process information when we verify your identity (“verification data”). This verification data may include your name, address, telephone number, e-mail address, date of birth, national identification number, government identification documents, and, if applicable, information regarding your bank account (such as the name of the bank, the account type and account number).

The source of this data is you. This data may be processed for the purposes of identity verification, restricting access of ineligible users to certain Services, ensuring enforcement of geographic restrictions, the detection of money laundering, terrorist financing, fraud, or any other financial crime, and/or performance our obligations to verify the identity of our customers. The legal basis for this processing is the compliance with our legal obligation, the protection and assertion of our legal rights, your legal rights and the legal rights of others, the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

1. We may process any of your personal information identified in this Policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interest, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
2. We may process any of your personal information identified in this Policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interest, namely the proper protection of our business against risks.
3. In addition to the specific purposes for which we may process your personal information set out in this Section 2, we may also process any of your personal information 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.
4. It is your sole decision whether to provide us with the requested information or not. However, if you choose to withhold requested information, we may not be able to provide you with access to the LYNKEY or the possibility to use Services. Depending upon the activity, some of the information that we ask you to provide is identified as mandatory and some as optional. Please do not supply any other person's personal information to us, unless we prompt you to do so.

3. Disclosing Your Personal Information

1. We may disclose your personal information to our affiliates, our contractors and our service providers insofar as reasonably necessary for the purposes, and on the legal bases, set out in this Policy.
2. We may disclose your personal information to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
3. In addition to the specific disclosures of personal information set out in this Section 3, we may disclose your personal information where such disclosure 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. We may also disclose your personal information where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
4. If we are required by the applicable law (for example, you are a resident of the EEA zone, UK or Switzerland) and your personal information is to be transferred outside our country of incorporation (British Virgin Islands) and/or the EEA zone, UK or Switzerland, we will ensure an adequate level of protection by any of the recognised methods of transfer, including but not limited to entry into the standard contractual clauses for the transfer of personal information to processors established in third countries.

4. Cookies

1. As with many other websites in the world, the LYNKEY uses cookies. A cookie is a small file on your device with a string of letters and numbers which serves as a unique identifier. Sometimes cookies can also be used to store your personal preferences on websites. When you open the LYNKEY for the first time, cookies are created on your device. When you open it next time, cookies are sent back to us, thus letting us know you've already been there. We don't create cookies ourselves, but we use third-party providers who do it for us.
2. Cookies make it easier for you to use the LYNKEY during future visits. They also allow us to monitor traffic and personalise the content of the LYNKEY for you. *Session-based cookies* only last while your browser is open, and are automatically deleted when you close the browser. *Persistent cookies* last until you or your browser deletes them or until they expire.
3. Some of our cookies may be necessary for certain uses of the LYNKEY. These cookies allow us to make the LYNKEY usable by enabling basic functions like page navigation. The LYNKEY may not function properly without these cookies.
4. We may also use functional cookies and cookies from third parties for analysis and marketing purposes. *Functional cookies* enable certain parts of the LYNKEY to work properly and your user preferences to remain known. *Analytics cookies*, among other things, collect information on how visitors use the LYNKEY, the content and products that users view most frequently, and the effectiveness of our third-party advertising.
5. We generally use cookies for the following purposes:
 1. authentication – we use cookies to identify you when you visit the LYNKEY and as you navigate through the LYNKEY;

2. status – we use cookies to help us to determine if you are logged into the LYNKEY;
 3. security – we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect the LYNKEY and our Services;
 4. analysis – we use cookies to help us to analyse the use and performance of the LYNKEY and Services; and
 5. cookie consent – we use cookies to store your preferences in relation to the use of cookies more generally.
6. We use analytics packages from trusted third parties to constantly improve your experience of using the LYNKEY and our services. Our trusted partners help us serve advertising and/or analytics and may place cookies on your device. You can find their privacy policies in the list below. Please read their privacy policies to ensure that you are comfortable with the manner in which they use cookies.
 7. We use the following third-party services to monitor and analyse web traffic and user behaviour and detect threats:
 1. Cloudflare. Cloudflare provides DDoS mitigation and Internet security services. Cloudflare utilises the data collected to detect malicious visitors to the LYNKEY and minimise blocking legitimate users. The data collected is used to identify users behind a shared IP address and apply security settings on a per-client basis. The service is subject to Cloudflare’s Privacy Policy
 2. Zendesk. Zendesk provides a cloud-based customer service platform that we use to provide support to our customers and users. Zendesk utilises the data collected to understand visitor and user preferences, improve their experience, and track and analyze usage, navigational and other statistical information. The service is subject to Zendesk’s Cookie Policy
 3. Facebook Pixel. Facebook Pixel is an analytics tool that allows to measure the effectiveness of advertising by understanding the actions people take at the Platform. The service is provided by Facebook, Inc. and is subject to the Facebook’s privacy policy. Facebook’s Privacy Policy is available via the link
 4. Google Analytics. Google Analytics is a web analysis service provided by Google Inc. Google utilises the data collected to track and examine user behaviour, prepare reports, and share insights with other Google services. Google may use the data collected to contextualize and personalize the advertisements launched via Google’s advertising network. The service is subject to Google’s Privacy Policy
 5. Amplitude. Amplitude is a cloud-based product analytics platform. Amplitude utilises the data collected to track and examine user behaviour and prepare reports on how our users use the Platform and services. The service is subject to Amplitude’s Privacy Notice

While we do our best to keep this list updated, please note that third parties who place cookies on your device may change from time to time, and there may be a slight delay updating the list.

1. You can generally activate or later deactivate the use of cookies through a functionality built into your web browser or mobile device. To learn more about how to control cookie settings through your browser:

Firefox
Chrome

Internet Explorer

Safari (Desktop)

Safari (Mobile)

Android Browser

For other browsers, please consult the documentation that your browser manufacturer provides.

5. Local Storage

1. Local storage, including Javascript-enabled localStorage, is a typical way for a website to store a small file of letters and numbers in your browser. We use local storage files to keep you signed in at our customer support platform. Local storage files are deleted when the website that stored them deletes them. You can also delete local storage files from your browser at any time you like by visiting your web browser settings.
2. You can clear local storage files from your browser by taking the following actions:

In Firefox, localStorage is cleared when the following conditions are met: (a) user clears recent history, (b) cookies are selected to be cleared, and (c) time range is "Everything";

In Chrome, localStorage is cleared when the following conditions are met: (a) clear browsing data, (b) "cookies and other site data" is selected, and (c) timeframe is "from beginning of time." In Chrome, it is also now possible to delete localStorage for one specific site;

In Internet Explorer, to clear localStorage: (a) click on Tools--Internet Options, (b) General tab, (c) delete browsing history on exit, (d) ensure "Cookies and website data" (or "temporary internet files and website files") is selected, and (e) consider unchecking "Preserve Favorites website data" at the top;

In Safari, to clear localStorage: (a) click Safari, (b) then click preferences, (c) select the Privacy tab, (d) click Remove all website data and (e) click Remove Now.

6. General Processing

Our processing means any operation or set of operations which is performed on personal information, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, support, maintenance, etc. We do not make automated decisions, including profiling.

We have implemented measures designed to secure your personal information from accidental loss and unauthorised access, use, alteration, and disclosure.

7. Retaining and Deleting Personal Information

We only retain your personal information for as long as it is necessary for us to use your information as described above or to comply with our legal obligations and legitimate interests. For instance, we may retain your data as necessary to meet our legal obligations, such as for tax and accounting purposes.

We will store your personal information that is used to send you promotional e-mails and/or newsletters or used in relation to your support tickets. Such information will be stored and processed solely for this purpose until you withdraw your consent, where applicable, or unsubscribe from newsletters, but not longer than for 3 years after your last interaction with us.

Otherwise, we either delete or anonymise the personal information collected. In case personal information was transferred to backup storage and, therefore, cannot be deleted, we continue to store it securely, but do not use it for any purpose. In all the other cases, we proceed with the deletion of personal information.

Please be aware that any blockchain wallets, even created through the LYNKEY, cannot be deleted from blockchain due to the technological specifics of blockchain networks and distributed ledgers.

8. Third Parties

1. The LYNKEY may contain links to any other websites or services. Please note that we are not responsible for the privacy practices or the content of such websites or services, and you should review the privacy policy of each such website or service to make sure you are comfortable with it before providing any personal information.

9. Rights of European Users

If you located in the EEA zone, UK, Switzerland as a data subject (a person whose personal information is collected, stored and processed) you have several rights under data privacy laws:

Right of access. You have the right to obtain confirmation if your personal information is being processed by us. If that is the case, you can access your personal information and the following information: (i) the purposes of the processing; (ii) the categories of personal information; (iii) to whom the personal information has been or will be disclosed; (iv) the envisaged period for which the personal information will be stored, or the criteria used to determine that period.

If you would like to have a copy of your personal information from us, we will provide it if (i) you prove your identity, (ii) it will not adversely affect the rights and freedoms of others. The first copy will be provided for free, for any further copies we may charge a reasonable fee based on administrative costs.

1. **Right to rectification.** You have the right to demand that we correct without undue delay your personal information which we have in our systems if it is inaccurate or incomplete.
2. **Right to erasure (“right to be forgotten”).** You have the right to demand that we erase your personal information, and we shall erase it without undue delay where one of the following grounds applies: (i) this personal information is no longer necessary in relation to the purposes for which it was processed; (ii) you withdraw consent on which the processing is based, and where there is no other legal ground for the processing; (iii) you object to the processing and there are

no overriding legitimate grounds; (iv) your personal information has been unlawfully processed; (v) your personal information has to be erased for compliance with a legal obligation.

3. **Right to restrict processing.** You have the right to restrict us in the ability of processing your information where one of the following applies: (i) you contest the accuracy of your personal information and we are verifying it; (ii) the processing is unlawful and you want to restrict it instead of erasure; (iii) we no longer need your personal information, but you need it for establishment, exercise or defense of legal claims; (iv) you have objected to processing and we are verifying whether legitimate grounds override your request.
4. **Right to data portability.** You have the right to receive your personal information which you provided to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another company, where: (i) the processing is based on your consent or on a contract; and (ii) the processing is carried out by automated means.

Where technically feasible, you can demand that we transmit those data directly to another company.

1. **Right to object.** You have the right to object to the processing of your personal information based on our legitimate interests. We shall no longer process your personal information unless we demonstrate compelling legitimate grounds for the processing or for the establishment, exercise or defense of legal claims.

Where personal information is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal information for such marketing.

1. **Right to withdraw consent.** You have the right to withdraw your consent for processing of your personal information at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

10. Changes to this Privacy Policy

1. We may modify this Privacy Policy by providing notice of such changes, such as by sending you an email, providing notice through the LYNKEY or its newsfeed, or updating the “Effective Date” date at the head of this Privacy Policy. By continuing to access or use of the LYNKEY or Services, you confirm your agreement to the modified Privacy Policy. If you do not agree to any modification to this Privacy Policy, you must stop using the LYNKEY and our Services. We encourage you to frequently review the Privacy Policy to ensure you understand the terms and conditions that apply to your access to, and use of, the LYNKEY and our Services.

11. Contact details

1. If you have any requests concerning your personal information or any queries with regard to this Privacy Policy please feel free to contact us at support@LYNKEY.com.

LYNKEY International Ltd.

Asia Leading Chambers, P.O. Box 986

Road Town, Tortola, British Virgin Islands