

PRIVACY POLICY

Last revised: 31.05.2021

You should carefully read this Privacy Policy (the “**Privacy Policy**”). By using, accessing or registering on the Service (as this term defined below) in any manner, including but not limited to visiting or browsing this Website, you agree to be bound by this Privacy Policy and all other operating rules, policies and procedures (changes, amendment, alterations thereto) that may be published from time to time on this Website, so please check it for updates.

This Policy describes and explains how we may collect, process and disclose your Personal Data (as this term defined clause 2.3 below) when you use the Service and tells you about your privacy rights and how the law protects you.

•INTRODUCTION

This Privacy Policy determines the way we process the Personal Data collected from users of our website www.neonlabs.org (the “**Website**”), applications, materials, other content, services and products provided (directly/indirectly) by the Company, as well as the devices to contact Company (the “**Service**”) and/or our counterparties (“**users**”, “**you**”, “**your**”).

The Services are operated by Neon Labs Ltd., a legal entity incorporated and existing in accordance with the Cayman Islands legislation (the “**Company**”, “**we**”, “**us**”, “**our**”). The Service may contain links to third-party websites, apps, utilities, etc. (not operated by Company) to exit the Service.

The Company cannot accept liability for the process of your Personal Data by such third parties. The Company is the data controller with respect to your Personal Data. The Company processes Personal Data directly or through subcontractors. We have specialized security team who constantly make every effort to prevent any unauthorized access and use of the Personal Data. This Privacy Policy does not apply to utilities which can be offered on other services (devices, apps, portals, websites) not operated by the Company. Your Personal Data are stored on secure servers in accordance with the applicable law and under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alter but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure.

Hereby you irrevocably declare:

that you have read, understood, found satisfactory and fully accepted this Privacy Policy and the Terms of Use;

that you confirm that your affirmative consent for processing of Personal Data is given freely, clearly, specifically and unambiguously;

that you consider the Terms of Use and risk warnings and risk disclosures provided in the Website in any form as an integral part of this Privacy Policy.

We shall not be required to accept you as a counter-party, including acceptance as a full-fledged user, and we may be unable to accept you as a client until all Know-Your-Client and Anti-Money-Laundering documentation we require is duly executed and received, if required under applicable laws, and we reserve the right to reject your payments of any nature (donations, investments, payments, etc.) until it has received all necessary documentation, properly completed and duly executed.

•PERSONAL DATA WE PROCESS

The Personal Data we process include the data (information) that you provide either directly (orally and/or in writing) or indirectly (e.g., when you visit our Website) to the Company. We do collect any Personal Data automatically.

We create the Personal Data about you or collect Personal Data that you choose to provide the Company with, e.g., when filling out enquiry forms, when subscribing to e-mail alerts, when downloading publications or other documents from the Service or when otherwise corresponding with Company other parties within Service. We may also receive Personal Data from third parties (e.g., due to disclosures made by counterparties of agreements). Personal Data in this Privacy Policy means data (information) relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as first name and surname, an identification number, location data, an email address, a telephone number, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing of Personal Data means operation or set of operations, which is performed on Personal Data or on sets of Personal Data, whether or not by automated means (if applicable), such as collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Types of Personal Data we usually Process including but not limited to:

your personal identification information (e.g., your full name, your date of birth, nationality, gender, signature, utility bills, phone number, home address, email);
institutional information (e.g. tax identification number or comparable number issued by an authorized authority, proof of legal formation, personal identification information for all material beneficial owners);
financial information (e.g., bank account information, payment card primary account number, transaction history, trading data, tax identification);
transaction information (e.g. information about the transactions that you made within our Services);
matter details (e.g., your directions or instructions given to us);
records of your approval of Processing your Personal Data using our Services;
records of usage and interactions of our Services (for example, your IP address and location);
advertisement campaign performance (e.g., your interaction with provided ads);
any other information you granted to us.

We may process your Personal Data by using direct marketing tools to contact you directly in order to provide you up-to-date information about our Services.

•PURPOSE FOR WHICH WE PROCESS PERSONAL DATA

We process the Personal Data for the following lawful purposes:

- to provide our Service and operate our business in a proper manner;
- to improve and develop our Service;
- to promote our Service;
- for contacting you;
- for interaction with external networks and platforms;
- for registration and authentication;
- for handling payments;
- for infrastructure monitoring;
- for managing contacts and sending messages;
- for analytics;
- to run, maintain and operate the Service;
- to comply with applicable laws;
- to recruit and handle with job applications;
- to send you relevant information you agreed with (or have requested to) about topics we consider as interesting for you by way of email or SMS notifications

(other forms of communication), any of which you may unsubscribe from at any time by contacting us.

If we intend to process the Personal Data subsequently for a purpose other than stated in clause 3.1 above, we will prior provide you with the relevant information on such processing including the right to withdraw your consent to the Personal Data processing for such purpose.

The Personal Data will be adequate, relevant and limited to what necessary in relation to the purposes for which they are processed as stated in clause 3.1 above.

•HOW WE DISCLOSE PERSONAL DATA

We process only the Personal Data that we need and will not disclose (share, sell, trade, or rent) the Personal Data with any third parties, unless otherwise directly specified in this Privacy Policy.

We may disclose the Personal Data for legitimate business purposes, when we believe that such disclosure is necessary:

- to conform to legal requirements or to respond to a subpoena, search warrant or other legal process received by us, whether or not a response is required by applicable law;
- for legal purposes by us in court or in the stages leading to possible legal action arising from improper use of the Service or the related services;
- to reveal the Personal Data upon request of public authorities;
- to protect our rights;
- to protect your safety.

The Company may disclose (in the scope limited to the necessary to disclose) the Personal Data to the following parties:

- our banking and brokerage partners, legal, marketing, strategic and financial advisors;
- data controllers within Company;
- third parties in case of a corporate transaction within the Company;
- third party vendors and service providers to provide services to the Company;
- law enforcement, government officials, or other third parties when we believe in good faith that the disclosure of the Personal Data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of the Privacy Policy;
- other users when you share Personal Data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside;
- other third parties only with your prior consent or direction to do so.

In all cases mentioned in clause 4.3 above such parties will be required to treat all such data with the same degree of care as we and they will be prohibited from disclosing such data to any other person or party, except as otherwise provided for in this Privacy Policy.

We may disclose aggregated information not linked to any Personal Data regarding users to business partners, trusted affiliates and advertisers.

User is entitled to withdraw his or her consent at any time to any kind of disclosure; however, in certain cases it may prevent you from participating or engaging in certain Service related activities. Such withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

•MAINTENANCE OF PERSONAL DATA

We process Personal Data lawfully, fairly and in a transparent manner. While we cannot guarantee that loss, misuse, unauthorized access, disclosure, alteration or destruction to data will not occur, because of the open system nature of the Internet, we make every effort

to prevent such occurrence. Any Personal Data transmission using via the Internet is at your purely own risk. In order to protect our users and partners from cyberattacks and reduce amount of risks we implemented through the Company and our Services all necessary precautions.

We will collect Personal Data only if they voluntarily submit such information to us. By submitting Personal Data, you agree to the transfer thereof, including cross-border transfer to countries other than your country of residence, in accordance with the applicable law. It means that this information may be transferred to — and maintained on — computers located outside of your state (province, country or other governmental jurisdiction) where the data protection laws may differ than those from your jurisdiction. The Company will therefore seek to ensure that all adequate safeguards are in place and that all applicable laws and regulations are complied with in connection with such transfer. The Company will ensure that it has entered into legally necessary contracts with recipients of the Personal Data where required by applicable laws.

•RETENTION PERIOD

The Company retains Personal Data for no longer than is necessary to fulfil the purposes for which the information was originally collected or as necessary to comply with our legal obligations, maintain accurate financial and other records, resolve disputes, and enforce our agreements.

The processed Personal Data shall be destroyed, anonymized or depersonalized upon the achievement of the processing purposes or if it is no longer necessary to achieve them, unless otherwise provided by applicable law. If all these are not possible (e.g., when your data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.

Users are entitled, at any time, to know whether their Personal Data has been stored and can consult with us to learn about their contents, origin and other information regarding its processing.

•YOUR RIGHTS

You have the right to obtain confirmation as to whether or not the Personal Data is being processed, and, where that is the case, access to the Personal Data and the following information (inter alia):

- the purposes of the processing;
- the categories of the Personal Data concerned;
- the recipients or categories of recipient to whom the Personal Data have been or will be disclosed;
- where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from us rectification or erasure of the Personal Data or restriction of processing of the Personal Data concerning the data subject or to object to such processing.

You may revoke your consent for processing of the Personal Data and receiving marketing communications hereunder at any time, free of charge by contacting us.

Taking into account the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

You have the right to obtain from us the erasure of your Personal Data without a delay where one of the following grounds applies:

- the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the processing is based and there is no other legal ground for processing;

the Personal Data have been unlawfully processed;
the Personal Data have to be erased for compliance with a legal obligation stated in the applicable law.

You have the right to obtain restriction of processing where one of the following applies:
the accuracy of the Personal Data is contested by you for a period enabling us to verify the accuracy of the Personal Data;
the processing is unlawful and you oppose the erasure of the Personal Data and requests the restriction of their use instead;
we no longer need the Personal Data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims.

You have the right to receive your Personal Data provided to us in a structured, commonly used and machine-readable format and have the right to transmit those Personal Data to another entity.

You have the right to object at any time to processing your Personal Data when such processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority and for the purposes of legitimate interest pursued by us or a third party, except where such interests are overridden by such your interests or fundamental rights and freedoms which require protection of Personal Data.

Where Personal Data are processed for direct marketing purposes, you have the right to object at any time to processing your Personal Data for such marketing.

You have the right to lodge a complaint before relevant data protection authority or supervisory authority.

You have the right to Personal Data portability.

•CHILDREN’S PRIVACY

If you are under 18 years old, you cannot use the Website and the Service.

We do not knowingly collect personally identifiable information from anyone under the age of 18.

If we become aware that a person under the age of 18 has provided us with personal information, we will delete it immediately. We will not accept any responsibility in part of process and protection of respective Personal Data.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

•CHANGES IN PRIVACY POLICY

From time to time we may make changes to the Privacy Policy. If we make changes, we will post them on the Website to notify the users thereof.

User shall acknowledge and comply with all changes to the Privacy Policy when using the Service after those changes posted. Further use of the Service means that you accept in full and agree with any alterations made to this Privacy Policy.

You acknowledge and agree that it is your responsibility to review the Privacy Policy periodically and become aware of modifications.

•CONTACT US

Any questions, comments, requests or complaints concerning this Privacy Policy and other materials from the Service should be directed to our help desk as listed on “Contact us” page of the Website.