

Latest Update: July 9, 2026.

1. SUBJECT OF PRIVACY POLICY

1) This Privacy Policy (“Privacy Policy”, “Policy”) defines the principles under which Axenor Holdings OÜ Private limited liability company registered and governed by law of Estonia Republic, at the following address: Harju maakond, Tallinn, Kristiine linnaosa, Rahumäe tee 6b-67, Estonia, entered into the Estonian Companies Register under number 17426720 (hereinafter referred to as “Company”, “we”), collects, processes, uses, and discloses personal information obtained from or about Users (“you”, “User”) during access to and use of the website crypto-holdings.io (the “Website”), including your rights in relation to such data.

2) This Policy forms an integral part of the Terms of Use of the Platform (“Terms”). By registering and using the Platform, you accept the Agreement in full. If you disagree with any part of the Agreement, you must cease using the Website and Platform.

2. GENERAL PROVISIONS

1) For the purposes of this Privacy Policy:

a. “Website” means the software and hardware system accessible at crypto-holdings.io, offering the Platform’s services and governed by this Policy and relevant documentation.

b. “GDPR” refers to the Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

c. “Personal Data” means any personal information that the User provides voluntarily during registration or while using the Website (e.g. name, date and place of birth, email address, phone number), and any data automatically collected by the Website (e.g. IP address, device information).

2) This Policy applies exclusively to Personal Data collected via the Website and in the context of its use.

3. DATA COLLECTED BY THE COMPANY

1) The Company collects only the information necessary to deliver its services. This includes but is not limited to:

- a. Full name;
- b. Date of birth;
- c. Address;
- d. Email address;
- e. Mobile phone number;
- f. Payment card or digital wallet information;
- g. Country of residence;

- h. Data visible on ID/passport documents;
- i. cookies;
- j. pixel tags, web beacons, browser analysis tools and web server logs;
- k. Data necessary to confirm Political Exposed Person status;
- l. information from the devices you use to access our Site or mobile platform, your operating system type or mobile device model, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone of your device, among other information;
- m. other data, if collecting them is required by applicable and binding law.

2) The Company may request additional information when necessary to fulfill regulatory or service requirements.

3) The Company processes personal data solely for legitimate, specified, and lawful purposes, including but not limited to:

a. **Provision of services** - to identify Users, verify their identity (KYC), and provide the products and services you request;

b. **Operational management** - to ensure the day-to-day operation, administration, and maintenance of accounts and services, including collection of amounts outstanding from Users;

c. **Contractual performance** - to create, execute, and store contracts, agreements, or transaction records arising from the use of the Platform;

d. **Customer communication** - to contact you (including by email) in response to inquiries, comments, or requests for support, and to safeguard your interests;

e. **Marketing and information** - to inform you about services, products, or promotional offers provided by the Company or its partners, provided you have not opted out of such communications;

f. **Product and service improvement** - to understand customer needs, study market trends, and develop, test, or improve our services and related products;

g. **Website and platform management** - to operate, manage, and maintain the functionality, performance, and security of our Website and services;

h. **Recruitment and applications** - to administer and process requests for information, partnership opportunities, or job applications submitted through the Website;

i. **Regulatory and legal compliance** - to comply with our statutory and regulatory obligations, including but not limited to responding to lawful requests such as warrants, subpoenas, or court orders, and fulfilling government reporting requirements (e.g., tax or AML/KYC laws);

j. **Fraud prevention and investigation** - to detect, investigate, and prevent suspicious or fraudulent activities and security threats;

k. **Protection of rights and property** - to enforce our terms, protect our intellectual property, ensure network integrity, and defend against legal claims;

l. **User experience and personalization** - to personalize your experience on the Website (e.g., content, interface, or announcements) and improve overall customer satisfaction.

4) The Company ensures that personal data are not further processed in a manner incompatible with these purposes unless required by law or with the User's explicit consent.

5) We may cooperate with governments and law enforcement officials or private parties to enforce and comply with applicable laws and regulations.

6) We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: to respond to claims, legal process, subpoenas; to protect our intellectual property, rights and safety and the property, rights and safety of a third party or the public in general; and to stop any activity we consider illegal, unethical or legally actionable activity.

7) The Website and its services are intended only for individuals over the age of 18. The Company does not knowingly collect data from minors. If you become aware of such a case, please notify the Company (see contact section), and appropriate measures will be taken to remove such data.

8) To the extent that the Company processes personal data on behalf of the Users, acting as a processor, this Policy constitutes a personal data processing agreement pursuant to Article 28 of the GDPR, under the terms and conditions set forth in this Policy.

9) Accepting of this Policy constitutes the User's instruction to process personal data, marked and processed in the manner and for the purpose specified in this Policy.

10) The basis for processing the User's personal data is the User's consent to the processing of his or her personal data for all purposes specified in this Policy.

11) Furthermore, data processing is also necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

12) The processing of certain categories of the User's personal data is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

13) This applies in particular to personal data which the Company must process for legal reasons incumbent on the controller. This applies in particular to personal data that the Company must process due to the legal obligations incumbent on the controller, including obligations arising from the AML/KYC procedure.

14) Company may collect certain information through cookies or other automated means, the rules of processing the data collected in this way are described in Cookies Policy.

15) The appropriately organised purposes of personal data processing in relation to legal basis are described in Appendix 1, which forms an integral part of this Policy.

4. ACCESS TO INFORMATION BY THIRD PARTIES

1) User data may be shared with:

- a. Employees,
- b. Agents,
- c. Contractors,
- d. Partners,
- e. Associated companies,

solely for the purpose of providing services under the Agreement.

2) Any third party receiving User data is obligated to comply with this Privacy Policy and is not permitted to use the data for any unauthorized purposes.

3) User data will not be shared with unrelated third parties unless:

- a. required under applicable law or court orders,
- b. explicitly provided for in this Policy.

5. USER RIGHTS UNDER GDPR

1) Users are entitled to exercise the following rights under applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 (“GDPR”):

a. You have the right to obtain confirmation as to whether or not your personal data is being processed, and, where that is the case, access to such personal data and information about the processing, including its purpose, categories of data, recipients, and data retention periods.

b. You may request correction or amendment of any inaccurate or incomplete personal data concerning you.

c. You may request deletion of your personal data if:

- i. the data are no longer necessary for the purpose for which they were collected;
- ii. you have withdrawn your consent (where processing is based on consent);

- iii. you object to the processing and there are no overriding legitimate grounds;
- iv. the data have been unlawfully processed; or
- v. erasure is required to comply with a legal obligation applicable to the Company.

d. You may request that processing of your personal data be restricted if:

- i. you contest the accuracy of your data (for a period allowing verification);
- ii. processing is unlawful but you oppose deletion;
- iii. the Company no longer needs the data, but you require it for the establishment, exercise, or defence of legal claims; or
- iv. you have objected to processing pending verification of the Company's legitimate grounds.

e. You may obtain a copy of your personal data that you have provided to the Company in a structured, commonly used, and machine-readable format, and you may request that such data be transmitted to another controller, where technically feasible.

f. You may object, on grounds relating to your particular situation, to processing of your personal data where such processing is based on the Company's legitimate interests. The Company shall cease such processing unless it demonstrates compelling legitimate grounds that override your interests, rights, and freedoms.

g. You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you, except where such processing is necessary for a contract or based on your explicit consent.

- 2) Where processing is based on your consent, you may withdraw that consent at any time without affecting the lawfulness of processing carried out before such withdrawal.
- 3) You have the right to lodge a complaint with the competent supervisory authority. In Republic of Estonia, this is the National Commission for Data Protection Inspectorate (Tatari 39, Tallinn 10134, Estonia; e-mail info@aki.ee).
- 4) To exercise any of your rights, you may contact the Data Protection Officer (DPO) by e-mail: contact@crypto-holdings.io. Requests will be handled without undue delay and within the time limits prescribed by applicable data protection regulations.
- 5) If you become aware of a personal data breach, please notify the Data Protection Officer.

6. RETENTION PERIOD

- 1) We will not retain data longer than is reasonably considered necessary to fulfil the purposes for which it was collected, processed or as required by applicable laws or regulations. When a user makes a request to have their account deleted and all data deleted, all personal Data collected through the platform will be deleted, as permitted by applicable law.

7. CONFIDENTIALITY AND SECURITY OF PERSONAL DATA

- 1) Company provide an adequate level of protection for the Personal Information and make sure that appropriate technical and organizational security measures are in place to protect the Personal Information against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing.
- 2) Company has a data protection audit and recovery system in place. We track and maintain strict records for all of our data processing activities. We place your account information on the secure portion of our Site, using firewalls and other security technology to protect our network and systems from external attacks, and we require you to enter a unique and confirmed email and password to access your account information online.
- 3) Our servers are enabled with Secure Sockets Layer (SSL) technology to prevent unauthorized parties from viewing the Personal Information that you provide or access during a secure session (look for the padlock icon on your browser). In addition, if you access information online, we use digital certificate services to authenticate that you are transacting with our Site and not the Site of an impostor.
- 4) However, to the extent that the internet is not completely secure, we cannot guarantee that any of your Personal Information stored or sent to us will be completely safe. We encourage you to use caution when using the internet to access our Site.

8. ADDRESS AND DETAILS OF THE PROCESSOR

- 1) **Company name:** Axenor Holdings OÜ.
- 2) **Legal Status:** Private limited liability company registered under the number 17426720 and governed by law of the Republic of Estonia.
- 3) **Registered office address:** Harju maakond, Tallinn, Kristiine linnaosa, Rahumäe tee 6b-67, Estonia.

Data Protection Officer (DPO) contact email: contact@crypto-holdings.io

Appendix No. 1

Appropriately organised purposes of personal data processing in relation to legal basis

We collect and process your Personal Data for the following purposes, and rely on the following legal bases:

Purpose	Description	Legal basis
Providing our websites (including our social media pages)	We process your Personal Information to operate and administer our websites and to provide you with the content you access and request	Our legitimate interest in providing online content to our customers and prospective customers regarding our service offering and related information
Improving our websites	We process your Personal Information to analyze overall trends and help us improve the user experience on our websites	Our legitimate interest in providing a relevant and well-functioning website for the benefit of our website visitors
Promoting the security of our websites	We process your Personal Information by tracking use of our websites and verifying and investigating activity	Our legitimate interest in promoting the safety and security of our websites and in protecting our rights and the rights of others
Displaying personalized advertisements and content	We process your Personal Information to conduct market research, advertise to you, provide personalized information about us on and off our websites and to provide other personalized content based upon your activities and interests	Our legitimate interest in advertising our products and services or, where necessary, to the extent you have provided your prior consent
Registering visitors	We process your Personal Information, including registration information and associated non-disclosure information, for security reasons	Our legitimate interest in protecting our offices, staff, visitors and our confidential information against unauthorized access

Managing event registrations and attendance	We process your Personal Information to plan and host events or webinars for which you have registered or that you attend, including sending related communications to you Where you explicitly consent, we also may process your biometric Personal Information to facilitate event registration and for security reasons	Performance of a contract or where we receive your explicit consent
Ensuring the safety and security of our employees, events and premises	We process your Personal Information where necessary based on a credible threat to our employees, events or premises	Our legitimate interest in protecting our employees, events and premises
Sending communications	We process your Personal Information to send you marketing information, product recommendations and other non-transactional communications (e.g., marketing newsletters, push notifications, information about our products, news or events) about us, our affiliates and partners	Our legitimate interest in conducting direct marketing or where you have provided your prior consent
Recording phone calls	We process your Personal Information, including recording phone calls (in accordance with applicable laws) for training, quality assurance, and administration purposes If required under applicable law, we will give you the option to object to a call being recorded	Consent or our legitimate interest in maintaining the high quality of our phone calls with users
Handling contact and user support requests	We process your Personal Information, if you fill out a “Contact Us” web form or request user support, or if you contact us by other means	Necessary for the performance of a contract or our legitimate interest in fulfilling your requests and communicating with you

	including but not limited to via phone	
Providing our services	We process your Personal Information to perform our contract with you for the provision of our services and to satisfy our obligations under the applicable terms of use	Necessary for the performance of a contract or our legitimate interest to provide and administer our services
Developing and optimizing the performance of the services	We process your Personal Information to develop, optimize, and improve the performance of the services	Legitimate interest to develop services and ensure that the services are performing in line with customer expectations; if special categories of Personal Information are processed, where the Personal Information is manifestly made public by the data subject
Providing personalized interactions	We process your Personal Information to customize our interactions with you	Legitimate interest to offer the best-in class services to our customers
Managing our customer and user accounts	We process your Personal Information (including Usage Data) to manage customer and user accounts generally, such as billing, customer correspondence and customer relationship management	Necessary for the performance of a contract or our legitimate interest in the management of customer and user accounts
Managing usage and licensing compliance	We process your Personal Information (including Usage Data) to assess and manage usage and licensing compliance with the applicable terms of use of our services	Necessary for the performance of a contract or our legitimate interest in managing the provision of our services to customers
Preparing internal reports and business modelling	We process your Personal Information (including Usage Data) for internal reporting and business modelling purposes (e.g., forecasting, revenue,	Our legitimate interest in the management of our business operations

	capacity planning, product strategy)	
Maintaining our security	We process your Personal Information (including your Usage Data) for the purposes of maintaining Our own security, including investigating, detecting and preventing suspicious activity, fraud and cybercrime that may affect Company or its services	Our legitimate interest in promoting the safety and security of Company generally and to protect our rights and the rights of others
Managing compensation for employees	We process your Personal Information (including your Usage Data) for the purposes of determining compensation for Company employees, such as commission	Necessary for the performance of a contract with an employee or our legitimate interest in fairly compensating our employees
Undertaking financial reporting	We process your Personal Information (including your Usage Data) for the purposes of financial reporting	Our legitimate interest in meeting our obligations associated with the reporting of our finances
Aggregating data	We process your Personal Information (including your Usage Data) for the purposes of aggregating this information to ensure that it is no longer identifying	Our legitimate interest in minimizing the amount of Personal Information processed as part of the noted processing activity
Managing, and participating in, webinars, contests, programs, training, certifications or promotions	We process your Personal Information if you register for a.o. a webinar, training, certification or a program. In some cases where the training or certification is through your employer, we will share your Personal Information with your employer.	Consent, necessary for the performance of a contract or our legitimate interest in providing the webinar, contest, promotion, training, certification or promotion

Managing payments	If you have provided financial information to us, we process your Personal Information to verify that information and to collect payments to the extent that doing so is necessary to complete a transaction and perform our contract with you	Necessary for the performance of a contract
Administering surveys and conducting research	We process your Personal Information (including, where legally permitted, special categories of Personal Information) in order to meet the goals set out in surveys or research as well as to analyze our compliance with internal policies	Consent or explicit consent (if required under applicable law) or our legitimate interest in conducting the survey or research based on its stated goals (where no special categories of Personal Information are in scope)
Collecting diversity information	We process your Personal Information (including special categories of Personal Information) to the extent you voluntarily consent to provide it to meet our broader community goals related to diversity and equality of opportunity	Consent or explicit consent (if required under applicable law)
Complying with legal obligations	We process your Personal Information (including Usage Data) when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Information to protect our rights	Legal obligation or our legitimate interest in protecting against misuse or abuse of our websites or services, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes, responding to lawful requests, or for auditing purposes