

PRIVACY NOTICE

1. ABOUT US AND HOW TO GET IN TOUCH

The website <https://signals.network/> as well as the signals network applications (web application accessible via <https://app.signals.network> and signals network mobile applications for iOS and Android - together referred further to as the “**apps**”) are operated by Signals Network, a Cayman Islands exempted company limited by shares, with its registered office at 2nd Floor, Willow House, Cricket Square, Box 709, Grand Cayman KY1-1 107, Cayman Islands (hereinafter “**signals network**” or “**we**”). As per applicable personal data protection laws, including 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 (General Data Protection Regulation), signals network is, when you use the signal network website or apps, the controller of your personal data, and as such determines the purposes and means of the processing, and decides why and how your personal data is processed.

In case you do not find answers to your questions in this privacy notice or should have any comments or requests for more information, please do not hesitate to contact us at: support@signals.network.

2. WHAT PERSONAL DATA DO WE PROCESS

Personal data means any information relating to an individual from which that person can be directly or indirectly identified. It does not include data anonymised in such a manner that the person is not or no longer identifiable. At signals network, we process the following categories of personal data:

- **Identity Data** including first name, surname, date of birth, gender, country of citizenship, profile photo, copy of your identification document (including type, number and expiry date of such document);
- **Contact Data** including residential address, e-mail address, phone number;
- **Technical Data** including details on devices you use to access our website or apps, your internet protocol (IP) address, login data (your username and password), browser type and version, time zone setting and location, and information on the operating system used;
- **Public Data** including public social media data from your accounts on social media platforms (e.g. Facebook, Twitter);
- **Aggregate data** including statistics and demographic information. The aggregate data may be derived from your personal data but is not considered personal data, so this data cannot directly or indirectly reveal your identity. We use the aggregate data to calculate the percentage of users accessing a specific function on our website.

3. HOW WE COLLECT YOUR PERSONAL DATA

We collect your personal data in the following ways:

- **Directly from you:** We primarily acquire your personal data from you while you fill in the forms on our website on in the apps or while you communicate with us online, by phone or otherwise. This particularly include your personal data provided, for example, when you:
 - register on our website or apps;
 - pass through the KYC (Know Your Customer) process;
 - use Signals apps;
 - subscribe for our newsletter..
- **Automatically:** When you visit or interact with our website, we may automatically acquire your personal data, particularly the technical data about your device and usage data about your browsing activities and patterns. We collect this data by using cookies, server logs and other similar technologies.
- **From third parties:** In some cases, various third parties provide us with your personal data, including technical data from analytics providers (e.g. Google) and public data from your accounts on social media platforms.

4. HOW WE PROCESS YOUR PERSONAL DATA

We process your personal data fairly, lawfully and transparently and only to the extent necessary for a particular purpose and for the period necessary to fulfil this purpose. We collect and process your personal data only when:

- you give us a consent to the processing your personal data;
- processing is necessary for the performance of a contract with you;
- processing is necessary for compliance with legal obligation to which we are subject to;
- we have legitimate interest in processing not overridden by your rights.

5. THE PURPOSES WE PROCESS YOUR PERSONAL DATA FOR

Processing purpose	Data category	Lawful basis for processing
Setting up your user account	Identity, Contact	Performance of a contract
Setting up your user account by passing the KYC procedure	Identity, Contact	Performance of a contract
Communication with you (including sending out any information you ask for, information on changes to our terms and conditions or this privacy notice)	(Identification), Contact	(Performance of a contract) / Legitimate interest
Sending the newsletter if you subscribe for it	Contact	Your consent
Administration, protection and improvement of our business, website or apps (support, data analysis, testing, system	Identification, Contact, Technical	Legitimate interest

maintenance, reporting and hosting of data)		
Personalisation of content on our website or app and online advertisements, including measure of effectiveness of that advertising	Identification, Contact, Technical, Public	Legitimate interest
Use data analytics to improve our website, services, marketing and for statistical and market research purposes	Technical	Legitimate interest

6. HOW LONG WE KEEP YOUR PERSONAL DATA FOR

We will keep your personal data for no longer than is necessary for the purposes described in this policy notice and to meet our legal and regulatory obligations. Further details of the periods for which we retain your personal data are available on request. Once this period of time is over, we delete your personal data or render it anonymous.

7. HOW WE SHARE YOUR DATA

We may disclose and share your personal data with the parties set out below:

- with our agents, representatives, trusted service providers and contractors;
- to fulfil our legal duty with law enforcement or regulatory authorities as may be required by law.

8. MARKETING PREFERENCE, ADVERTS AND COOKIES

Marketing, adverts. Advertising and/or promotional messages may be displayed throughout our website and apps. This advertising may relate to the content of the services, queries entered through the services and also other information. We also may inform you through commercial messages about our services or about the services and products of our affiliates or partners, and may do so using your user account, as well as your email address.

You have the right to ask us not to process your personal data for marketing purposes. You can exercise the right at any time by contacting us at support@signals.network.

Cookies. On our website we use cookies and use information collected from cookies to distinguish you from other users of our website and to personalize communication towards you. The consent with using cookies is optional and you can set your browser to refuse or disable cookies or to alert you when website set or access cookies. For detailed information how to disable cookies in different types of browsers, please see websites of respective browsers. Please note that if you set your browser to refuse or disable cookies, some parts of our website may become inaccessible or not function properly.

9. THE WAY WE PROCESS YOUR PERSONAL DATA AND HOW IT IS SECURED

We undertake appropriate organisational safeguards and security measures to protect all and any of your personal data to ensure its confidentiality, and to protect it from loss, misuse, alteration or destruction. Your personal data is processed manually and automatically within electronic information

systems, in electronic or paper form, by our employees and processors, which are bound to keep it confidential. We store your personal data in secure storage facilities located in the European Union.

10. YOUR RIGHTS WITH REGARD TO THE PERSONAL DATA PROTECTION

At any time while your personal data is being processed, you have the following rights under the data privacy legislation:

- **Right to access to your personal data.** You have the right to obtain from us the confirmation of whether and what personal data about you we process including the right to receive a copy of your personal data we process.
- **Right to rectification of your personal data.** You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you including the right to complete or update your personal data.
- **Right to erasure of your personal data.** You are entitled to request us to delete your personal data. Please bear in mind that we may not always be able to comply with your request if the processing is necessary for specific legal reasons, this will be notified to you at the time of your request.
- **Right to restriction of processing of your personal data.** In some cases you have the right to ask us to restrict the processing of your personal data, for example if you contest the accuracy, legality or our need to process your personal data or if you have objected to processing.
- **Right to your personal data portability.** You are entitled to receive the personal data (in structured, commonly used and machine-readable format) concerning to you and to transmit those received data to another company or person. Please note that this right applies only to your personal data processing carried out by automated means on the basis of your consent, or in order to fulfil an agreement.
- **Right to not be subject to automated decision-making.** If significantly affects you or has legal effects concerning you, you have right to not be subject to a decision making solely by automated processing including profiling
- **Right to lodge a complaint with the supervisory authority.** If you have any complaints regarding the processing of your personal data or you think there is a breach of your rights given by the law on the protection of personal data, you are entitled to lodge a complaint with the supervisory authority within a European Union member state which is entrusted with supervision over rights and obligations in personal data protection being kept. However, we would really appreciate the chance to deal with your concerns or complaints before you lodge the complaint with the supervisory authority, so please contact us in the first instance.

11. RIGHT TO OBJECT TO PROCESSING OF PERSONAL DATA

Besides the rights mentioned above, you have right to object to the processing of your personal data. This right applies only to processing your personal data based on legitimate interest pursued by the controller or third party or carrying out the task undertake in the public interest or exercise of public authority. You can also lodge an objection to our processing of your personal data for direct marketing purposes including profiling.

If you object to the processing and we do not demonstrate that we have legitimate grounds to process your data overriding your personal interest or rights and freedoms, we shall no longer processed the your personal data.

12. HOW YOU CAN EXERCISE YOUR RIGHTS

If you decide to exercise any above mentioned rights with regard to your personal data, please inform us directly by email. Please bear in mind that in some cases you may be asked to prove your identity when you are exercising your rights.

13. CHANGES TO THIS PRIVACY NOTICE

We may change or update this privacy notice from time to time and in particular to accommodate any new data protection legislation which is enacted in the Cayman Islands. If we make any such changes or updates we will post the latest version on our website. If we make any changes or updates which may have a significant impact on your privacy, we will inform you by an email. We recommend you to read this privacy notice regularly to remain informed about how we process your personal data and how you can protect your privacy.

This privacy notice was last updated on February 18, 2019.