

PRIVACY POLICY

Please carefully read this Privacy Policy ("**Policy**"), which governs how NovaCyber Ltd, a company registered in accordance with legislation of British Virgin Islands with its registered office at Vistra Corporate Services Centre, Wickhams Cay II, Tortola, VG1110, British Virgin Islands ("**Company**", "**we**"), collects, uses and discloses information, when you access or use Company's Service as such term is described in Terms of Use, or when you otherwise interact with us.

1. Applicability and Acceptance of Policy

1.1. This Policy defines the Personal Data, explains how Personal Data is collected, used, processed, and disclosed.

1.2. This Policy shall come into effect at the moment you first access to the Service. By accessing, browsing or using the Service you irrevocably and unconditionally accept and adhere to provisions of this Policy without any exemptions, limitations and/or exclusions.

1.3. In the event you disagree with any provision of this Policy or would not like to provide your consent for processing of your Personal Data, you shall cease using the Service.

2. Information about the Data Controller

2.1. The data controller of this Service is NovaCyber Ltd, a company registered in accordance with legislation of British Virgin Islands with its registered office at Vistra Corporate Services Centre, Wickhams Cay II, Tortola, VG1110, British Virgin Islands. Contact details: legal@webwisewallet.com

3. Legal Grounds for Personal Data Processing

3.1. We process your Personal Data on the basis that it is:

3.1.1. necessary for the performance of a contract, therefore, where we have a contract with you, we will process your Personal Data in order to fulfil that contract (in particular, to provide access to the Service and render Services available through it);

3.1.2. authorized by your Consent, which you give us as it is set out in section 4 hereof;

3.1.3. necessary for compliance with our legal obligation, in particular, when we are obliged to respond to a court order or a regulator;

3.1.4. necessary for performance our legitimate interests;

3.1.5. permitted by applicable legislation.

4. Consent to Personal Data Processing

4.1. EU Persons Consent to Personal Data processing

4.1.1. If you are an EU Person and to process your Personal Data we need to receive your consent, as it is prescribed by GDPR, we will process your Personal Data only in the case we have received from you a freely given, specific, informed and unambiguous indication of your wishes by which you signify agreement to the processing of your Personal Data ("**Consent**").

4.1.2. You may give your Consent by ticking a box when visiting the Service. In the case you tick the respective box, you irrevocably and unconditionally consent and agree that the Company shall be entitled to process your Personal Data as it is indicated by your Consent.

4.1.3. Your Consent covers all processing activities with your Personal Data carried out for the same purpose or purposes. When the Processing has multiple purposes, your Consent should be deemed given for all of them.

4.1.4. You have the right to withdraw your Consent at any time. You can submit such request by sending us an email to legal@webwisewallet.com. Your withdrawal of Consent shall not affect the lawfulness of your Personal Data processing based on Consent before its withdrawal.

4.1.5. Except as required or enabled by law we will not use or disclose your Personal Data for any purpose for which you refuse Consent or later withdraw your Consent. If you withdraw Consent, you agree that in spite of this withdrawal, we may continue to use those Personal Data previously provided to us to the extent that we are contractually or otherwise legally obliged to do so and to the extent necessary to enforce any contractual obligation you may have towards the Company or in any other way permitted by law.

4.2. Non-EU Persons Consent to Personal Data processing

4.2.1. If you are not an EU Person, by transferring to us your Personal Data via the Service or otherwise, you irrevocably and unconditionally consent and agree that the Company shall be entitled, in accordance with this Policy:

- To Process in any manner, including to collect, store, use, disclose, share and transfer (including cross-border), your Personal Data so provided to us, as well as your Personal Data collected from your use of the Service (i.e. your Personal Data which we collect automatically and/or from other sources); and
- to use cookies and web beacons (pixel tags) to collect your Personal Data and associate the Personal Data with your computer and web browser.

5. Collection of Personal Data

5.1. General Provisions

5.1.1. The type of Personal Data we collect depends on how you are interacting with us. In many cases, you can choose whether or not to provide us with Personal Data, but if you choose not to, you may not get full functionality of the Service. When you visit Service, you may provide us with the following types of Personal Data: *(i)* Personal Data that you voluntarily disclose that is collected on an individual basis; *(ii)* Personal Data collected automatically when you use the Service; and *(iii)* Personal Data which we collect from sources other than the Service.

5.1.2. The Service contains links to other third-party websites that may collect Personal Data about you, including through cookies or other technologies. If you use our links to visit another websites, services this Policy will not apply to your use of, and activity on those other websites. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any information that is submitted to or collected by these third parties.

5.2. Personal Data You provide to Us

5.2.1. In order to fulfill our obligations on provision an access to Service and/or provision of Opportunities for you and applicable terms of use, We are entitled to ask you to provide us with your Personal Data, including (but not limited):

- passport or other ID document data (stored at ondato.com servers);
- selfie (stored at ondato.com servers);
- phone number;
- cryptocurrency wallet address and information about transactions made through it;
- Telegram ID.

Personal Data hereof is collected only when voluntarily offered, and solely for purposes that are clearly identified on the Service or in this Policy.

5.2.2. The Company may collect the Personal Data from you in a variety of ways and circumstances, including, but not limited to, registration at the Service, subscription to a newsletter, filling out a form, providing us with

feedback. The Company shall be entitled to combine Personal Data collected in the course of your interaction with different sections of the Service with any other relevant available information.

5.3. Personal Data We Collect Automatically

5.3.1. Personal Data collected by or transmitted to the Company in the course of accessing, interacting and operating of the Service may include, without limitation, the following Personal Data:

- device information, which may include (but is not limited to) information about the computer or mobile device you use to access the Service, including the hardware model, operating system and version, the web browser you use, and other device identifiers;
- server log information, which may include (but is not limited to) your login details, the date and time of visits, the pages viewed, your IP address, time spent at the Service and the websites you visit just before and just after the Service;
- information collected by cookies and other tracking technologies. We and our service providers use various technologies to collect information when you interact with the Service, including cookies and web beacons. ‘Cookies’ are small data files that are stored on your device when you visit a Service which enable us to collect information about your device identifiers, IP address, web browsers used to access to the Service, pages or features viewed, time spent on pages, mobile app performance and links clicked. Web beacons are graphic images that are placed on a website or in an email that is used to monitor the behavior of the user visiting the website or sending the email. They are often used in combination with cookies. The Company’s policy regarding the cookies is specified in Cookies Notice.

5.4. Data We Collect from Other Sources. We may also receive information about you from other sources, such as when you log in to Service by using your account credentials for a separate third-party service. We will receive information from that service as indicated in the relevant third party's authorization screen.

6. Use of Personal Data

6.1. We use Personal Data for the following purposes.

- 6.1.1.** to provide access to the Service;
- 6.1.2.** to provide Opportunities through the Service;
- 6.1.3.** to handle your orders and requests, including requests for technical support and assistance;
- 6.1.4.** to conduct AML/KYC measures that we are obliged to conduct under applicable law;
- 6.1.5.** to properly fulfil tax-related and accounting obligations imposed by applicable laws;
- 6.1.6.** to detect, investigate, and prevent illegal activities or conduct that may violate the terms of use of the Service and this Privacy Policy;
- 6.1.7.** personalize your experience with our Service;
- 6.1.8.** contact you in relation to, and conduct, surveys or polls you choose to take part in and to analyse the data collected for market research purposes;
- 6.1.9.** conduct internal research and development and to improve, test and enhance the features and functions of our Service;
- 6.1.10.** provide you with marketing materials as permitted by law;
- 6.1.11.** meet our internal and external audit requirements, including our information security obligations;

7. Disclosure of Personal Data

7.1. The Company treats Personal Data as confidential and may not pass on or use any such data without valid legal grounds.

7.2. We will only disclose your Personal Data in the following circumstances:

- 7.2.1. with your Consent or at your instruction;
- 7.2.2. with companies under common control or ownership with us or our offices internationally;
- 7.2.3. for everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations;
- 7.2.4. in connection with a merger or sale of our company assets, or if we do a financing or are involved in an acquisition, or any other situation where Personal Data may be disclosed or transferred as one of our business assets;
- 7.2.5. if we believe your actions are inconsistent with our terms of use of the Service or applicable legislation, or to protect the rights, property and safety of any assets of the Company or third parties;
- 7.3. The Company may without limitations share aggregated or de-identified information, which cannot reasonably be used to identify you.
- 7.4. The Company use third-party services that ensure AML/KYC measures available in Service. We shall transfer necessary part of your personal data to such third-party services to provide you with access to certain functions of the Service. We have made sure that all service providers to whom we transfer your Personal Data follow our instructions on how they should process your Personal Data. The transfer of your Personal Data is governed by the data processing agreements or data processing conditions that we have concluded with the service providers. List of such third party is subject to change but in any case, we shall add information about such third party in the Privacy Policy. Currently, we attract following third parties to ensure adequate level of AML/KYC measures in the Service:
 - 7.4.1. Ondato (privacy policy available at: <https://ondato.com/privacy-policy/>)

8. Transmission of Personal Data

- 8.1. The transmission of Personal Data or any other information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. The Company is not liable for the security of any Personal Data or any other information you are transmitting over the Internet, or third-party content.
- 8.2. Information about you may be transferred to, and processed in countries other than the country in which you are a resident. We have taken appropriate safeguards to require that your information will remain protected in accordance with this Privacy Policy.
- 8.3. Personal Data of EU Persons transmitted to a recipient outside the European Economic Area may be processed by a staff member operating outside the European Economic Area (EEA) who work for us or for one of Digital Content developer or copyright owner. Such staff may be engaged in amongst other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

9. Protection of Personal Data. Security Measures

- 9.1. We take appropriate security, administrative and technical measures to protect any Personal Data you provide regarding the collection, storage and processing of Personal Data, as well as security measures to protect your Personal Data against unauthorized access, modification, disclosure or destruction.
- 9.2. Personal Data is safeguarded from unauthorized access and unlawful processing or disclosure, as well as accidental loss, modification or destruction, through state-of-the-art technical and organizational measures. These are adjusted and updated continuously in tandem with technical developments and organizational changes. Additionally, Personal Data protection audits and other controls are carried out on a regular basis. However, no computer security system is entirely fool proof and the Internet is not a secure method of transmitting information. As a result, we do not assume any responsibility for the Personal Data you submit to or receive from us through the Internet, or for any

unauthorized access or use of that information, and we cannot and do not guarantee that information communicated by you to us or sent to you by us will be received, or that it will not be altered before or after its transmission to us. You agree to not hold the Company liable for any loss or damage of any sort incurred as a result of any misappropriation, interception, modification, deletion, destruction or use of information provided through the Service.

10. Retention of Information

10.1. In accordance with applicable laws and as needed to fulfill our obligations, we may hold your Personal Data. This requirement is conditioned by a need to comply with legal obligations and resolve possible disputes.

10.2. The Company may retain your Personal Data until your Consent is not withdrawn or terms of use of the Service is terminated. Provided however that we try not to store any your personal data, specified in section 5.2. of Privacy Policy longer that it is necessary to propose you personal training plan or to respond to your inquiry.

11. Your Rights in relation to Personal Data

11.1. The Company is committed to making sure you can exercise your respective rights effectively and free of charge. The Company will ensure each your request related to your Personal Data be reviewed in a timely fashion.

11.2. You have the following rights relating to your Personal Data in accordance with any applicable laws, including GDPR:

11.2.1. right to access.

11.2.2. right to data portability.

11.2.3. right to erasure ("Right to be forgotten") and right to rectification.

11.2.4. right to object.

11.2.5. right to be informed. the right to lodge a complaint with a supervisory authority

12. Children`s Privacy

12.1. The minimum age to use the Service is 18 years. The Company will not knowingly collect Personal Data from children under this age. Insofar as certain countries apply a higher age of consent for the collection of Personal Data, the Company requires parental consent before Personal Data associated with such child is collected. The Company encourages parents to instruct their children to never give out personal information when online.

13. Alterations to Policy

13.1. We have the right, at our discretion, to update this Policy at any time. We recommend that you frequently check this Policy to find any changes and stay informed about how we help protect the Personal Data.

13.2. By using the Service, you will acknowledge and agree that it is your responsibility to periodically review this Policy and be aware of the changes.

13.3. The subsequent use of the Service after changes to this Policy will also be considered as your acceptance of these changes.

13.4. This Policy may from time to time be translated into other languages. To the extent that any discrepancy may exist between the English version of this Policy and its version in another language, the English version prevails.

14. Data Protection Officer

14.1. The Company appoints an expert on data privacy who works independently to ensure that the Company is adhering to the policies and procedures set forth in the GDPR (data protection officer). Data protection officer assists the Company to monitor internal compliance, inform and advise on data protection obligations, provide advice regarding data protection impact assessments (DPIAs) and act as a contact point for data subjects and the supervisory authorities.

15. Feedback

15.1. We welcome your questions and suggestions with respect to the implementation or amendment of this Policy. Please use this feedback for communicating with us: legal@webwisewallet.com