



## PRIVACY POLICY

Update date: June 28, 2024

### **1. General information about the privacy policy.**

1.1. This Privacy Policy (hereinafter referred to as the Policy) defines the procedure for processing personal data and measures to ensure the security of personal data taken by megabit.kg (hereinafter referred to as the Operator).

1.2. The most important task and an integral condition of the Operator's activities is respect and protection of human rights and freedoms in the process of processing his personal data, which guarantees the confidentiality of personal life.

1.3. This personal data processing policy (hereinafter referred to as the Policy) covers all information that the Operator may receive from users of the site <https://megabit.kg>.

### **2. Basic concepts used in the Policy.**

2.1. Automated processing of personal data is the process of processing personal data using computer tools.

2.2. Blocking of personal data is a temporary cessation of their processing, except in cases where clarification of the data is necessary.

2.3. Cross-border transfer of personal data is the transfer of data to the territory of another state, to an authority of that state, to a foreign individual or legal entity.

2.4. Cookies are small text files stored on the user's computer that are used for record keeping.

2.5. Crime records - personal data associated with criminal convictions and offences.

2.6. Data controller is a person processing data on behalf of Megabit, excluding its employees.

2.7. Depersonalization of personal data is a process as a result of which it is impossible to determine whether the data belongs to a specific subject without additional information.

2.8. Dissemination of personal data - actions aimed at disclosing it to an indefinite number of persons or making it available to an unlimited number of persons, including publication in the media, posting on networks or providing access to data in any way.

2.9. Destruction of personal data - actions leading to their irreversible destruction and deprivation of the possibility of recovery in the system or on physical media.

2.10. The site is a complex of graphic and information materials, as well as programs and databases that ensure their availability on the Internet at <https://megabit.kg>.

2.11. Personal data - information directly or indirectly associated with a specific or identifiable user of the <https://megabit.kg> website, including data that allows the identification of a person through identifiers such as name, number, location, online identifier, or through one or more factors, characteristic of physical, psychological, genetic, economic, cultural or social identity.

2.12. Personal data information system is a set of personal data contained in databases and technological means for processing it.

- 2.13. Processing of personal data - any operations or set of operations performed with personal data, including collection, recording, systematization, accumulation, storage, clarification, extraction, use, transfer, depersonalization, blocking, deletion of data.
- 2.14. Providing personal data - actions aimed at disclosing data to a specific person or group of persons.
- 2.15. Special categories of data - personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as the processing of genetic data, biometric data for the unique identification of a person, data about health, sex life or sexual orientation.
- 2.16. User - an individual or legal entity registered on the website <https://megabit.kg>.
- 2.17. Visitor is an individual or legal entity who visits the site <https://megabit.kg>, but is not registered and does not use the site's services.

### **3. Personal information about the user.**

#### **3.1. Reasons for providing personal data by a user to Megabit:**

Megabit accumulates data provided by users to provide a high-quality interaction with Megabit services and ensure users receive optimal use of the Megabit site, products and services.

Data is also collected in accordance with Megabit's internal audit procedures under the Kyrgyz law on combating the financing of terrorist activities and the legalization (laundering) of criminal proceeds.

Users provide their data voluntarily by filling out forms on the Megabit website when registering an account, as well as when subscribing to Megabit services, sending requests or reviews, registering for events, uploading documents, participating in forums or social events on the site, participating in promotions and surveys, reporting problems on the site, etc.

#### **3.2. Categories of data that Megabit collects from the user:**

- Full name, residential address, contact details, including email, telephone numbers;
- date and place of birth, gender, citizenship;
- blockchain addresses used to conduct transactions on the blockchain;
- information about bank accounts, debit and credit cards, sources of funds, assets and liabilities;
- trading account balances, trading activity, user requests and Megabit responses;
- information necessary to confirm your identity, including passport data, driver's license and other identification documents;
- photo/video with ID - images of the user with identification documents;
- any other data that Megabit deems necessary to comply with the law.

#### **3.3. Data automatically collected about Megabit user:**

- data collected by analytics systems, including IP addresses, domain names, login information, browser types and versions, time zone settings, plug-in and operating system information;
- information generated when using the site, automatically collected and stored in Megabit server logs, including device data, location, system activity, pages visited, response times, loading errors, length of visits, page interactions and exit methods;
- information obtained through the use of Megabit services, including the registration process, subscription to events and news, as well as information from customer support and third parties such as payment providers, online identity services and public sources.

#### **3.4. User data obtained from external sources:**

- basic personal and financial information of the user, including bank account details provided by banks, EMI and payment systems;
- the user's provided name and address and financial information;
- provided anonymous or depersonalized information about the user, including data about how the user found the Megabit website;
- provided username, email, nationality, age, date of birth, keys or public key certificates.

3.5. Personal information provided when creating an account is retained for one year, even if registration is not completed or cancelled.

#### **4. Trusted partners.**

4.1. Megabit employs a set of industry approved practices, procedures and organizational practices to protect the confidentiality of customer personal data from unauthorized access, use or disclosure.

4.2. The data processing process, which includes hosting provider services (storage and maintenance of databases containing password-protected personal data of clients), is carried out on behalf of Megabit and in accordance with the privacy policy by authorized Megabit Data Operators. At the end of this contract, Operators return the information to Megabit or transfer it to a new Operator designated by Megabit, and destroy all copies in their possession. However, the Operator has the right to retain data to fulfill potential administrative or judicial obligations.

4.3. Trusted partners (Operators) acting on behalf of Megabit under non-disclosure agreements and capable of storing, maintaining or processing customer data.

4.3.1. Megabit cooperates with authorized service providers (Operators), whose services and solutions complement, simplify and optimize Megabit's offerings in accordance with documented confidentiality agreements that ensure compliance with regulations and protection of the rights of individuals whose data is processed. Operators follow Megabit's instructions exclusively. They are directly responsible and may be subject to fines or other penalties.

4.3.2. Operators may obtain or otherwise have access to identifiable or anonymous personal data of customers, in whole or in part, depending on their specific functions and purposes in improving and facilitating Megabit's services and business, and may use it solely for these purposes.

#### **5. Use of personal information.**

5.1. Megabit may use collected customer information to:

- provision of services requested by the client;
- client account management and customer support;
- conducting research and analysis of the use of Megabit products, its services or content, as well as customer interest in these and other offers;
- communications with the client through email, postal mail, telephone calls and/or mobile devices regarding products or services that are offered by Megabit or other parties and may be of interest to the client;
- compliance with Megabit's policies and conditions;
- managing the activities of Megabit and performing the functions described to the client upon provision.

5.2. Megabit may use financial information or payment methods to prevent and detect potential fraud and as necessary to manage its business.

5.3. Megabit may share customer personal data with authorized service providers who provide certain services on the company's behalf. These services may include order and payment processing, customer support, marketing assistance, business and sales analysis, support for Megabit site features, and the administration of contests, surveys and other offers on the Megabit site. These providers may have access to necessary personal information to perform their functions, but may not share this information or use it for other purposes.

## **6. Disclosure of personal information.**

6.1. Megabit may disclose client information:

- in response to legal requests, such as subpoenas or investigative requests, court orders, or requests for cooperation from law enforcement or other government authorities;
- to assert or protect Megabit's legitimate interests;
- for protection against legal claims;
- when Megabit believes that disclosure of information is necessary to investigate, prevent or take action regarding illegal activities, suspected deception or other violations;
- to protect the rights, property or safety of Megabit, its customers, employees or others;
- to comply with laws or cooperate with law enforcement authorities;
- to comply with Megabit's terms of use or other agreements and policies;
- in accordance with legal requirements.

6.2. Disclosure of information to third parties.

6.2.1. Megabit does not rent, sell or share customer personal information with others or independent companies without the customer's consent, except to provide products or services requested by the customer, if Megabit has the customer/visitor's permission, or in the following circumstances:

6.2.2. Megabit shares information with trusted partners who provide services on behalf of the company, subject to non-disclosure agreements. These partners (Data Controllers) may manage, serve or process customer data within the scope of the authority granted. They do not have the autonomous right to disseminate the information received.

## **7. Child protection.**

7.1. Megabit does not provide its services to persons under 18 years of age.

## **8. Purposes of processing personal data.**

8.1. Users' personal data is processed for the purpose of concluding, executing and terminating civil law agreements, as well as to provide access to services, information and/or materials on the Megabit website.

8.2. The operator reserves the right to send users notifications about new products, services, special offers and events. Users may opt out of such notifications by sending an unsubscribe request to [support@megabit.kg](mailto:support@megabit.kg).

8.3. Anonymous data collected through web analytics services is used to collect information about user activities on the site in order to improve the quality of the site and its content.

## **9. Use of cookies.**

9.1. Megabit remembers user preferences and provides a personalized experience by using various types of cookies to identify the user when visiting a site or using services:

- authentication cookies to display relevant information and personalize the user experience after login;

- session cookies to store the user's session ID, allowing the session to be restored without re-entering data;
- security cookies to maintain security and help detect fraudulent activity;
- preference cookies to customize user preferences such as language and general settings, speeding up the process of filling out forms;
- performance and analytics cookies to analyze site performance and improve products, features and services;
- third-party cookies to analyze site and advertising performance.

9.2. Megabit uses Google Analytics, which may collect user behavior data to statistically analyze site usage.

## **10. Legal basis for data processing.**

10.1. The operator processes data only when the user provides it through special forms on the website <https://megabit.kg>. By submitting data, the user agrees with the policy.

10.2. The operator can process anonymous data with the consent of the user, expressed through browser settings (permission to use cookies and JavaScript).

## **11. Procedure for collecting, storing, transferring and other forms of processing of personal data.**

11.1. The protection of personal data processed by the Operator is guaranteed through the implementation of legislative, administrative and technical measures provided for the reliable implementation of the provisions of laws on the protection of personal data.

11.2. The operator guarantees the confidentiality of personal data and takes all necessary steps to prevent access to it by unauthorized persons.

11.3. The user's personal data will not be transferred to third parties, except in cases provided for by law.

11.4. If the user finds inaccuracies in his personal data, he can correct them by sending a message indicating "Change personal data" to the Operator at [support@megabit.kg](mailto:support@megabit.kg).

11.5. The period for processing personal data has no time restrictions. The user has the right to withdraw his consent to the processing of personal data at any time by sending a corresponding notice marked "Refusal to process personal data" to the Operator at [support@megabit.kg](mailto:support@megabit.kg).

## **12. Final articles.**

12.1. Any changes to the Operator's personal data processing policy will be reflected in this document. The policy is valid indefinitely until replaced by a new version.

12.2. The current version of the Policy is publicly posted on the website <https://megabit.kg>.

NOTICE: Users and visitors may want to change their browser settings to block cookies. However, if you refuse cookies, you will not be able to access the system or use most features of the Megabit website.