

Last updated: August 24, 2021

**LEXi Digital Assets Ltd** (hereinafter “**LEXIT**”, “**us**”, “**we**” or “**our**”) has created the following Privacy Policy to commute to you clearly and conclusively how LEXIT processes (including collection, use, transferring, storage, deletion, etc.) your personal information. The Privacy Policy informs you of your rights as a data subject. The Privacy Policy is an integral part of the agreements between you and LEXIT.

LEXIT is the controller of your personal data. LEXIT processes personal data in accordance with applicable law, including consistent with 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 (the “Regulation”).

Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions (accessible from <https://www.lexit.com/terms-and-conditions>) which together with this Privacy Policy must be read and accepted prior to using our Website or Services. We highly recommend reading the Terms and Conditions first since the descriptions and explanations presented there will make it easier to understand this Privacy Policy.

Please read the Privacy Policy carefully prior to submitting the data, use of LEXIT Services or concluding contracts with LEXIT.

1. What kind of personal data is collected?
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If you cannot find the answers you're looking for in our Privacy Policy or have any other questions regarding your personal data, please do not hesitate to contact LEXIT using the following contact information:

**Name:** LEXi Digital Assets Ltd

**Email:** [contact@lexit.co](mailto:contact@lexit.co)

**Website:** <https://www.lexit.com>

## 1. What kind of personal data is collected?

- Basic identification data: first and last name, date of birth, citizenship;
- Contact data: e-mail address, residential address;
- Copy of legal documents: passport + photo of user holding the passport; ID-card/driver license (front, back + photo of user holding the document); proof of residence (utility bill, phone bill, bank statement);
- Information related to the “On behalf of the Company” account;
- Information provided when creating a listing: a summary of the sale provided through data inputs, questions, drop-downs, storytelling etc. via LEXIT Services.

In the course of using LEXIT Services you may provide additional information and/or content by filling out your user profile.

## 2. How does LEXIT collect the personal data?

Generally LEXIT only collects data that you provide to us. Data is collected when:

- you request information about our Services via our Website;
- you create a personal account;
- you create a “On behalf of the Company” account;
- you create a listing and submit it for review;
- you submit information in a public forum or any social media accounts linked to LEXIT (Facebook, Twitter, LinkedIn, Telegram, Reddit, YouTube, Bitcoin Forum);
- you sign up for our social media notifications.

## 3. What are the purposes of the processing?

Essentially, LEXIT provides an online marketplace facilitating NFT Transactions. In order to provide you the LEXIT Services, you have to conclude a contract with LEXIT. Therefore, LEXIT processes your personal data for the performance of the contract and in order to take steps prior to entering into a contract (LEXIT Terms and Conditions, accessible from <https://platform.lexit.com/terms-and-conditions>). We use the personal information you have provided for creating and managing your user account, managing your subscriptions and to provide and improve the LEXIT Services. The data will also be used for verification purposes.

Furthermore, the processing might be necessary for compliance with legal obligations to which LEXIT is subject. For example, LEXIT is required to organise the accounting and financial reporting. LEXIT also may have obligatory procedures for preventing money laundering and terrorist financing established by legislation, etc.

LEXIT will also process your personal data if the processing is necessary for the purposes of the legitimate interests pursued by LEXIT. In every such case LEXIT will consider whether such interests might be overridden by the interests or fundamental rights and freedoms of the data subject. For example, LEXIT has the legitimate interest to process your data to help with fraud identification and prevention.

LEXIT may use your email address to send you transactional emails. Those emails are not promotional in nature, and might be triggered by interactions with LEXIT, such as:

- Password confirmation email;
- Reset password email;
- KYC status email;
- Listing verification email;
- Personal message;
- Other non-promotional content;

LEXIT can process your personal data if you have given consent to the processing of your personal data for one or more specific purposes. For example, LEXIT can send you direct marketing offers if you have expressly given such consent. You have the right to withdraw your consent at any time. However, we remind you that the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

#### 4. Where do we store and process personal data?

We place great importance on the security of all personally identifiable information associated with our users. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control.

We generally process your personal data in the European Union (EU) and European Economic Area (EEA). In case your data is transferred to any third countries, we always make sure that appropriate and suitable safeguards compliant with the Regulation are implemented, such as the EU-U.S. Privacy Shield Framework. You can learn more about the EU-U.S. Privacy Shield Framework here: <https://www.privacyshield.gov/welcome>.

We will carefully assess all the circumstances and make sure appropriate safeguards are put in place so that your rights are not in any way undermined. We make sure that conditions to enforce your rights and effective legal remedies are available.

#### 5. How long do we retain your personal data?

LEXIT has both the right and the obligation to retain the personal data collected for a period of time. LEXIT does not retain personal information longer than necessary to achieve the purposes of processing and comply with the obligations of LEXIT. However, LEXIT may retain the personal data for a longer period of time if you have given consent for longer storage and processing of the data.

As a general rule LEXIT will keep your personal information for as long as your profile is active. Users are free to close their accounts and stop using LEXIT Services at any time. If you delete your profile, we keep your data for the limitation period (3 years by default) of possible claims. If you have not logged into your profile for 1 year, your profile is considered to be inactive; however, your personal data will be retained for the maximal limitation period of 10 years beginning from your last login. If you use your account again during that period, it will be reactivated (considered active again).

The information contained in the accounting records will be retained for seven years in accordance with the law.

If LEXIT sends personal information to another controller, the data retention periods will be determined by the recipient of the data.

#### 6. To whom and why do we transfer your personal data?

LEXIT discloses personal information only to the extent and in the form necessary for the fulfilment of the purposes listed in the Privacy Policy.

LEXIT may transfer your personal data to other data controllers or processors. LEXIT may share information with companies that provide support services to LEXIT (ID verification, company & company account verification, listing verification). These companies may need information about you in order to perform their functions. Data processors are not authorized to use the shared data for any other purpose.

LEXIT is required to transfer personal data if LEXIT is legally bound by such an obligation. For example, LEXIT might be obligated to disclose personal data to public authorities upon their legitimate request.

#### 7. What are your rights as a data subject?

You always have the opportunity to opt out of receiving promotional communications any time by following the instructions in those communications. If you opt out, we may still send you non-promotional communications (transactional emails, see Section 3).

Users are in control of their privacy when using the LEXIT Services. However, they accept the fact that they are paying careful attention to all the disclaimers and guidelines on the LEXIT Website and/or those provided with the Services.

You have the right to receive information about the personal data processed by LEXIT, including the categories of data processed, the sources of the data, purposes of processing etc. You are also entitled to receive copies and extracts of personal data processed. You have the right to request the correction or updating of data if it turns out that the personal data being processed is inaccurate.

You have the right to object to processing, on grounds relating to your particular situation, at any time to processing of personal data concerning you if such processing is only necessary for the purposes of the legitimate interests pursued by LEXIT.

You have the right to obtain from LEXIT restriction of processing or the erasure of your personal data. LEXIT will erase your data or implement other measures that result in the data becoming permanently anonymous if:

- your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw the consent on which the processing is based and there is no other legal ground for the processing;
- you object to the processing and there are no overriding legitimate grounds for the processing;
- your personal data have been unlawfully processed;
- your personal data have to be erased for compliance with a legal obligation to which LEXIT is subject.

LEXIT will fulfil your request within a reasonable time, but no later than one month after receiving the request.

In case of any suspected infringement of your privacy, please contact LEXi Digital Assets Ltd via e-mail: [contact@lexit.co](mailto:contact@lexit.co). We'll try to resolve the dispute by negotiation.

Any revisions to this Privacy Policy will be posted on the LEXIT Website. We recommend to periodically visit our Website to review any changes that may be made to this Privacy Policy. LEXIT may bring any amendments of the Privacy Policy to the user's attention by placing a notice on the Website, and/or by sending an email and/or by any other means deemed appropriate by LEXIT. If you continue to use our Website and Services, it constitutes your agreement to be bound by this Privacy Policy and any possible changes.