

Data Protection Statement

Last updated: 20.02.2020

The privacy of our customers is a top priority for us. The transparent and legally compliant handling of personal data, as well as the protection of such data from unauthorized access, is a core part of our business model. The following data protection policy describes the circumstances and conditions under which information is stored by us, processed, or, as the case may be, transferred to third parties.

§ 1 Responsible controller

The controller responsible for the storage and processing of personal data in terms of chap. 4 para. 7 of the GDPR is:

SAVL OÜ, a company incorporated under the laws of Estonia, with a registered office at Harju maakond, Tallinn, Lasnamäe linnaosa, Peterburi tee 47, 11415, Estonia

§ 2 Data Protection Officer

A data protection officer has not been appointed, since this is currently not required. Should the material and/or legal situation change in this respect, we will immediately appoint a data protection officer and provide the contact information here.

§ 3 General Information on the collection and processing of personal data

(1) This Data Protection Statement applies to the website www.savl.com as well as the mobile app "SAVL" provided by us, which you can download to your mobile device via the Google Play Store or iOS App Store. In the following, we will inform you about the collection and processing of personal data when you use our website as well as our mobile app. Personal data are all data that can be related to you personally, such as name, address, email addresses, your user behavior, etc. (chap. 4, para. 1, no. 1 of the GDPR).

(2) If we make use of commissioned service providers for individual functions of our offers or wish to use your data for advertising purposes, we will inform you in detail about the

procedures below. At the same time, we will also identify the defined criteria of storage duration.

§ 4 Collection and processing of personal data in connection with the use of our website

(1) This website makes use of the Appsflyer web analytics service, provided by AppsFlyer Ltd. ("Appsflyer").

A list of the data stored and processed by Appsflyer can be found here:
<https://www.appsflyer.com/services-privacy-policy/>

Appsflyer will process this information in our commission in order to evaluate the use of our online services by the users and generate reports on user activities within these online services for the purposes of analysis and optimization of our services. The legal basis for this is chap. 6 para. 1 sentence 1 f. GDPR.

Appsflyer may need to transfer Customer Data to countries other than the country from which the Data originated. Any such transfer shall be done in compliance with all applicable laws. With regards to the collection, use and retention of personal data transferred from the European Economic Area or Switzerland to the United States, Appsflyer complies with the EU-U.S. and Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce, by which Appsflyer demonstrates in accordance with chaps 45, 46 GDPR that it complies with the level of data protection in accordance with the GDPR.

The data protection policy of Appsflyer can be found here:

<https://www.appsflyer.com/services-privacy-policy/>

Your IP address is stored by our partner only in an abbreviated form and evaluated for us, so that only a rough localization of your IP down to the country of origin is possible.

AppsFlyer provides End Users with the ability to opt-out of being measured by the Services by emailing a request to privacy@appsflyer.com or by completing the form here:
<https://www.appsflyer.com/optout/> .

(2) On our website you have the opportunity to sign up for our email newsletter. In this case, we will ask you to consent to the storage and use of your email address for the purpose of the distribution our newsletter. Storage of the email address that you specify when you sign up for our newsletter is done solely for this purpose. The legal basis for the storage and processing is your consent in accordance with chap. 6 para. 6 sentence 1 a. GDPR.

We do not track your email address that you have specified in your registration for the newsletter in conjunction with other personal data. Our newsletter contains no cookies. The deletion shall be carried out as soon as your email address is no longer required for the purpose of sending the newsletter, for instance, if we stop sending the newsletter, or in response to your explicit withdrawal of consent. You may revoke your consent at any time by notifying us, for example using the pertinent link in our newsletter, or via our contact data under our legal notice. (chap. 7 para. 3 GDPR)

§ 5 Collection and processing of personal data when using our mobile app

(1) When you download our mobile app from an app store, the necessary information is sent to the app store, in particular the user name, email address and customer number of your account, the time of the download, the payment information, and the individual device code. Depending on the end device used, the app store provided will either be iOS App Store by Apple Inc. ("Apple") or Google Play Store by Google LLC. ("Google"). We have no influence on this data collection and are not responsible for it. We process such data only to the extent necessary for downloading the mobile app onto your mobile device.

The data protection policy of Apple can be found here:

<https://www.apple.com/legal/privacy/en-ww/>

The data protection policy of Google can be found here:

https://www.gstatic.com/policies/privacy/pdf/20191015/9ad23b47/google_privacy_policy_en.pdf

(2) Within the application of our mobile app we make use of the digital identification service Sum&Substance of the Sum and Substance Ltd. ("Sum"Substance"). Sum&Substance will

store and process the following information on our behalf, in order to adhere to the legal provisions relating to the services offered by us in our mobile app (legal basis is chap. 6 para. 1 sentence 1 c GDPR) and to support the security of the transactions carried out via our mobile app (legal basis is chap. 6 para. 1 sentence 1 f. GDPR).

A list of the data stored and processed by Sum&Substance can be found here:

<https://sumsub.com/privacy-and-cookie-policy/>

Sum&Substance exclusively stores the personal data of users on a server within the area of application of the GDPR in the European Union.

Your IP address is stored by our partner only in an abbreviated form and evaluated for us, so that only a rough localization of your IP down to the country of origin is possible.

The data protection policy of Sum&Substance can be found here:

<https://sumsub.com/privacy-and-cookie-policy/>

(3) When you use our mobile app, we also collect additional personal data that we require in order to provide you with the functions of our mobile app as well as to improve it, and in order to ensure the stability and safety of use. The nature and composition of the data processed and stored by us depends on the concrete use of our app by the end user. (Legal basis is chap. 6 para. 1 sentence 1 f. GDPR) The data stored and processed by us are for example:

1. Mobile phone number of the user, in order to enable you to use our app
2. Email address and country that the user has selected during the registration process, in order to promote the security of our services
3. Preferred fiat currency of the user, e.g. RUB, USD, EUR, UAH in order to facilitate the use of our services
4. The date of registration and the last profile update to promote the security of users in the use of the app

5. The individual address of the investments blockchain, as well as a list of the public user addresses from the currently 6 common crypto-currencies (Bitcoin, Litecoin, Biocoin, Bcash, Ripple, Ethereum) to enable transactions over the app
6. The synchronization of contacts in the address book on the mobile device of the user with the registered users of SAVL to enable transactions between the user and the saved contacts of the user within the app
7. Transactions of the user over the app in order to ensure secure use of the app
8. The user's digital correspondence over the app, including a list of all the conversations of the user, public and secret chat keys of the user, sending and updating time of the messages, status of the messages (sent, received, read), the sent messages and URLs in encrypted form, in order to ensure the comfortable use of our chat/correspondence function within the app
9. Technical usage information such as hash values and tokens for facilitating and simplifying the login process in the app

(4) In the case of iOS App Store users this app uses the web analytics services provided by Apple iTunes Analytics of Apple Inc.

A list of the data stored and processed by Apple iTunes Analytics can be found here: <https://developer.apple.com/app-store/app-analytics/>

Apple processes this information on our commission in order to evaluate the use of our online services by the users and generate reports on user activities within these online services for the purpose of analysis and optimization of our services. The legal basis for this is chap. 6 para. 1 sentence 1 f. GDPR.

Apple Analytics also generally stores the personal data of users within the EU on a server within the area of application of the GDPR in the European Union. On rare occasions, Apple may transfer the data into third countries and save them there. Apple has however established appropriate safeguards to ensure compliance with the requirements of the GDPR and transfers the data to a third country only where enforceable rights and effective legal remedies are available to users.

Your IP address is stored by our partner only in an abbreviated form and evaluated for us, so that only a rough localization of your IP down to the country of origin is possible.

The data protection policy of Apple can be found here:

<https://www.apple.com/legal/privacy/en-ww/>

(5) When you use our mobile app, this app also makes use of the AppsFlyer web analytics service, provided by AppsFlyer Ltd. ("**Appsflyer**").

A list of the data stored and processed by AppsFlyer can be found here:

<https://www.appsflyer.com/services-privacy-policy/>

AppsFlyer will process this information in our commission in order to evaluate the use of our online services by the users and generate reports on user activities within these online services for the purposes of analysis and optimization of our services. The legal basis for this is chap. 6 para. 1 sentence 1 f. GDPR.

AppsFlyer may need to transfer Customer Data to countries other than the country from which the Data originated. Any such transfer shall be done in compliance with all applicable laws. With regards to the collection, use and retention of personal data transferred from the European Economic Area or Switzerland to the United States, AppsFlyer Inc. complies with the EU-U.S. and Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce, by which AppsFlyer demonstrates in accordance with chaps 45, 46 GDPR that it complies with the level of data protection in accordance with the GDPR.

The data protection policy of AppsFlyer can be found here:

<https://www.appsflyer.com/services-privacy-policy/>

Your IP address is stored by our partner only in an abbreviated form and evaluated for us, so that only a rough localization of your IP is possible.

AppsFlyer provides End Users with the ability to opt-out of being measured by the Services by emailing a request to privacy@appsflyer.com or by completing the form here: <https://www.appsflyer.com/optout/>.

§ 6 Collection of personal information when contacting us by other means

When you contact us outside of our mobile app and our website, for example, by email, telephone, or by other means, any information you make available to us is stored by us; the data is, however, only stored in the case of statutory retention obligations (legal basis: chap. 6 para. 1 sentence 1 c. GDPR), or, to the extent that such data are required for this purpose, for the purpose of responding to your inquiry (legal basis: chap. 6 para. 1 s. 1 f. GDPR). We delete the data collected in this context after the storage is no longer required for the purpose of responding to your inquiry, or – in the case of statutory retention obligations – restrict the processing to the legally required extent.

§ 7 Minors

Our website, our mobile app and the services offered by us are not conceived or designed for minors, especially children under the age of 16. We will not knowingly collect or store information about minors.

§ 8 Your Rights

(1) You are entitled to the following rights in relation to us with regard to the personal data concerning you:

- Right to information (chap. 15 GDPR)
- Right to rectification (chap. 16 GDPR) or deletion (chap. 17 GDPR)
- Right to limitation of processing (chap. 18 GDPR)
- Right to object to the processing (chap. 21 GDPR)
- Right to data portability (chap. 20 GDPR)

(2) You also have the right to appeal to a data protection supervisory authority concerning the processing of your personal data in our company. Before you take this path, however, we ask that you contact us directly with your concerns. Your right of appeal will not be affected by this.