

PRIVACY POLICY

Last updated: 15.04.2025

This Privacy Policy (hereinafter – the Policy) explains how, to what extent and for what purposes your personal data are collected, processed and stored by Limited Liability Company “DataGroup” (hereinafter – the Company, we, us, our, ours) – a legal entity established and operating under the laws of the Kyrgyz Republic: registration number 208003-3301-000, TIN 02507202210232, OKPO 31552816, located at the address: 55/5 Logvinenko Street, Bishkek, Kyrgyz Republic.

This Policy is developed in accordance with and pursuant to the Law of the Kyrgyz Republic No. 58 “On Personal Information” dated 14 April 2008.

This Policy shall be applied and effective solely with respect to the Clients of the Telegram bot @SwapsterBot or Swapster mobile application. The Company does not collect and process personal data (including cookies) through its website <https://swapster.fi/>.

By using the Company's services provided through its facilities –Telegram bot @SwapsterBot or Swapster mobile application – you, as a Client, agree to this Policy and all its terms and conditions. If you do not want your personal data (as defined below) to be used in the ways described in this Policy, you shall not use the Company's services.

TERMS AND DEFINITIONS

Terms used in this Policy have the following meaning:

Personal information (personal data) – recorded information on a tangible medium about a specific person, identified with a specific person or which can be identified with a specific person, allowing to identify this person directly or indirectly, by reference to one or more factors specific to his/her biological, economic, cultural, civil or social identity.

Personal data includes biographical and identifying data, personal characteristics, information on marital status, financial situation, health status and others.

Personal data array – any structured aggregate of personal data of an indefinite number of subjects, regardless of the type of data carrier and the means used for their processing (archives, file cabinets, electronic databases, etc.).

Personal data confidentiality regime – normatively established rules defining restrictions on access, transfer, provision and storage conditions of personal data.

Personal data subject (subject) – the Company's Client to whom the relevant personal data relates.

Holder (owner) of personal data array – the Company.

Processor – an individual or legal entity, determined by the Company, which processes personal data on the basis of a contract concluded with it.

Collection of personal data – a procedure for the Company to obtain personal data from data subjects or other sources in accordance with the laws of the Kyrgyz Republic.

Processing of personal data – any operation or set of operations performed independently by or on behalf of the holder (owner) of personal data, by automatic means or not, for the purposes of collection, recording, storage, updating, grouping, blocking, erasure and destruction of personal data.

Consent of the personal data subject – expressed in the form provided for by this Law, free, specific, unconditional and informed expression of the person's will, according to which the subject notifies his/her consent to the procedures related to the processing of his/her personal data.

Transfer of personal data – provision of personal data by the Company to third parties.

Cross-border transfer of personal data – transfer of personal data by the Company to holders (owners) located under the jurisdiction of other states.

Updating of personal data – prompt amendment of personal data in accordance with the procedures established by the current legislation of the Kyrgyz Republic.

Blocking of personal data – temporary cessation of transfer, clarification, use and destruction of personal data.

Destruction (erasure or destruction) of personal data – actions of the holder (owner) of personal data to bring this data into a state that does not allow to restore its content.

Company's facilities – Telegram bot @SwapsterBot or Swapster mobile application.

PRINCIPLES OF WORK WITH PERSONAL DATA

When dealing with personal data, the Company adheres to the following principles:

- collects and processes personal data in the manner prescribed by law;
- collects and processes personal data only for the purposes specified in this Policy;
- ensures the accuracy of personal data and updates it if necessary;
- stores personal data strictly for the period necessary to fulfil the purposes for which they were collected and destroys them once the purposes have been achieved or no longer required;
- stores and protects personal data against unlawful access, additions, modifications and destruction.

BASIC RIGHTS AND OBLIGATIONS OF PERSONAL DATA SUBJECTS

As a personal data subject, you have the right to:

- full information about your personal data processed by the Company;
- access your personal data, including the right to receive a copy of any record containing your personal data, except as provided by law;
- have your personal data clarified, blocked or destroyed if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;

- take measures provided for by law to protect your rights, including appealing to the authorised state authority on personal data and to the court;
- exercise other rights provided for by the legislation in force.

As a personal data subject, you are obliged to:

- provide the Company with only reliable data about yourself;
- provide information and documents containing personal data to the extent necessary for the purpose of processing;
- notify the Company of the clarification (update, change) of your personal data.

WHAT PERSONAL DATA THE COMPANY COLLECTS, PROCESSES AND STORES

The personal data that the Company collects, processes and stores includes, but is not limited to, the following information:

- surname, first name, middle name;
- gender;
- date of birth;
- passport details;
- nationality;
- postal address and address of actual residence;
- telephone number;
- Telegram nickname;
- email address;
- IP address;
- payment card details;
- cryptocurrency wallet details.

The Company may also request additional financial and investment information from you to verify your eligibility for certain transactions, including your investment experience, qualifications, level of your annual income, source of funds, proof of tax payment, etc.

It is important that the personal information the Company holds about you is accurate and up to date. Please inform us whenever your personal data changes in the course of your co-operation with the Company.

The Company may receive information about you from third parties, such as affiliates, subsidiaries, analytics service providers, information retrieval service providers or publicly available sources if required or permitted by applicable law, including information about whether you may be on sanctions lists or is a politically exposed person.

PURPOSES OF COLLECTION AND PROCESSING OF PERSONAL DATA

The Company collects and processes your personal data (both on its own and with the help of third-party processors) for the following purposes:

- to confirm your identity when you create a wallet and to provide access to the Company's services;
- to process your payments;
- to communicate with you and respond to your appeals, applications, complaints;
- to develop new products, services, functions;
- to fulfil the requirements of the legislation on countering the financing of terrorist activities and money laundering;
- to prevent misuse of the Company's services and protect the Company's property rights and security;
- to comply with other legal obligations of the Company.

The Company stores information about your wallet in encrypted form and does not use this information for any purpose other than to provide you with services and fulfil the Company's legal obligations.

To comply with money laundering and terrorist financing prevention legislation, the Company is required to collect, store and analyse documents that identify you, your contact details, transaction history, verification data, including from third-party sources (e.g. publicly available databases, commercial registries and sanctions lists) and other types of information required by law.

PERSONAL DATA OF PERSONS UNDER 18 YEARS OF AGE

The Company does not collect or process personal data of children (under 18 years of age). Only individuals who are at least 18 years of age may use the Company's services and facilities and provide information to the Company. If the Company becomes aware that anyone under the age of 18 has provided or attempted to provide personal information and use its services, the Company will endeavour to permanently delete that information from its files.

SPECIAL CATEGORIES OF PERSONAL DATA

The Company does not collect, process, store or use personal data revealing racial or ethnic origin, nationality, political opinions, religious or philosophical beliefs, or concerning health conditions and sexual inclinations.

COOKIE FILES

The Company does not collect cookies for any purpose.

PERSONAL DATA PROTECTION MEASURES

The Company takes all necessary legal, organisational and technical measures to ensure the protection of personal data in order to avoid unauthorised or accidental access to them, change,

blocking, copying, transmission, distribution, as well as their accidental or unauthorised destruction, alteration or loss.

Employees of the Company, to whom personal data became known due to their official position, assume obligations and bear responsibility for ensuring the confidentiality of these personal data. Such obligations remain in force even after the termination of work of these persons with personal data during the period of confidentiality regime preservation.

STORAGE PERIOD OF PERSONAL DATA

Personal data is kept for as long as necessary to fulfil the purposes for which it was collected. In particular, in order to fulfil its legal obligations, the Company keeps information about you and the transactions you have carried out for 5 years after the termination of the relationship with you (when you have not used the Company's services for more than two years).

When the storage period expires and the purposes of collecting personal data have been fulfilled, they are to be destroyed.

TRANSFER OF PERSONAL DATA

The Company may outsource the processing of your personal data to third parties – processors (companies that assist in processing, verifying your transactions and other services; identity verification companies; fraud or crime prevention companies). These processors act on behalf of the Company and may only use your information to provide services on behalf of the Company. They are not permitted to use it for their own purposes and the Company takes all reasonable and necessary steps to ensure that the processors protect your personal data to prevent unauthorised access, blocking, transfer or accidental or unauthorised destruction, alteration or loss.

The Company may also transfer your personal data to its affiliates or subsidiaries for the sole purpose of providing services to you. However, the processing of your personal data by such affiliates and subsidiaries will be strictly in accordance with this Policy.

In any restructuring, sale of our Company, merger with another company or acquisition of a new company, we may transfer your personal data to such new entity or company, provided that any recipient will use your personal data for the same purposes for which it was originally provided to us and/or used by us.

The Company may share your personal data with law enforcement, judicial, regulatory authorities, including if necessary to investigate, prevent or take action regarding illegal activities.

CROSS-BORDER DATA TRANSFER

Many of the Company's third parties are based outside the Kyrgyz Republic, so their processing of your personal data will involve data transfers to other countries. Such countries may have different data protection or privacy rules from those of the Kyrgyz Republic. Nevertheless, the Company takes measures to ensure that any such transfer complies with applicable laws and that your personal data remains protected.

By using the Company's services provided through its facilities, you consent to the cross-border transfer of your data.

TRANSACTION TRANSPARENCY

Due to the inherent transparency of blockchain networks, the transactions you approve may be publicly available. This includes, but is not limited to, your public key address, the recipient's public key address, the amount of cryptocurrencies sent or received, and any other data you choose to include in a particular transaction.

Transactions and addresses available on blockchain networks may reveal personal information about a user's identity, and personal information could potentially be correlated now or in the future by any party that chooses to do so, including law enforcement.

LANGUAGE

The Policy may be written in several languages. In case of discrepancies between the versions in different languages, the Russian version will take precedence.

CONTACTS

If you have any questions about this Policy or the processing of your personal data, or if you wish to make a complaint or enquiry in relation to the processing of your personal data, please contact us by email at info@swapster.fi or via Telegram [@SwapsterSupport](https://www.telegram.com). The Company endeavours to respond to your enquiries as quickly as possible.

CHANGES TO THE POLICY

This Policy is current as of the effective date set forth above. The Company may update this Policy at any time by posting a modified version on <https://swapster.fi/>, the Telegram bot [@Swapsterbot](https://www.telegram.com) or Swapster mobile application, including the effective date of the modified version. We ask that you check for updates or changes to the Policy yourself from time to time. Your continued use of the Company's services constitutes your acknowledgement and acceptance of such changes to this Policy. However, we will endeavour to keep you informed of any material changes.