Privacy Notice

Last update 06.07.21

PureFi takes care of your personal data and does everything possible to protect it. This Privacy Notice is written to help you understand what your personal data is collected, stored and used, and what happens to it, when you use our website.

In this Privacy Notice we answer the following questions:

- 1. Who are we?
- 2. What does this Privacy Notice cover?
- 3. What data do we collect and why?
- 4. How long do we keep your data?
- 5. Do we share data with third parties?
- 6. <u>Do we do data transfer outside the European Economic Area?</u>
- 7. What rights do I have regarding my data?
- 8. <u>Do we use cookies?</u>
- 9. EU and EEA users
- 10. How do we update Privacy Notice?

1. Who are we?

We are **PureFi**, located at Avelot Limited, Room 747, 7/F, Star House, 3 Salisbury Road, Tsim Sha Tsui, Hongkong. Hereinafter, PureFi will be referred to as "we" and "our".

We are the controller of your personal data, which means that we determine what, for what purpose and how your personal data will be processed.

If you have any questions, you can contact us by sending an email to <u>info@purefi.io</u> You can also send us a letter at the address: Avelot Limited, Room 747, 7/F, Star House, 3 Salisbury Road, Tsim Sha Tsui, Hong Kong.

Our EU representative: Paymir Global OU, Harju maakond, Kuusalu vald, Pudisoo küla, Männimäe/1, 74626

2. What does this Privacy Notice cover?

This Privacy Notice applies to our website and services.

Website address: <u>https://purefi.io/</u>

3. What data do we collect and why?

The data we process is divided into two categories: **technical information** and data that is provided to us by **user**.

Technical information. When you visit our website, some data is collected automatically. We need technical data to operate, maintain, and improve our website. This includes data such as IP address, UTM parameters, geolocation, device type, and data about your interaction with the website-session ID.

The **session ID** includes your interaction with the website, the functions you use, the pages viewed on our website, the way you use our website, and the actions you take if such actions are present.

Data provided by the user. To provide the service we need: interests, full name, email.

Data provided by third parties. Information we can get from social media Twitter, Telegram, Medium.

Type of data	Description of data	Legal basis	Reasons for processing
You fill out the "whitelist" form	interestsfull nameemail	Performance of the contract	Providing necessary information about the product
You connect with us through social media	 Name photo email address other information that can be obtained via Twitter, Telegram, Medium 	Legitimate interest	marketing, support
You connect	 Name 	Legitimate	marketing, support

Once again, briefly about what personal data we collect:

with us through email	 photo email address other information that can be obtained via email 	interest	
Automatically collected data	Technical information Session ID	Legitimate interest	Website operation; Analytics; Statistics
you have consented to cookies	Cookies	Consent	Analytics; Statistics

4. How long do we keep your data?

We store personal data in one category — **user's data**

We store personal data of users for the duration of the development and usage of the service.

However, you can exercise your right to delete your data. In this case, your data will be deleted from our servers within 30 days of your request.

5. Do we share data with third parties?

We use your personal data to perform a contract and for communication between us and the user. We use and transfer your personal data in measures which are needed to perform a contract. Also, we transfer your data on the following grounds:

Consent. We transfer your personal data based on your explicit consent.

Compliance with the law. We will disclose your personal data to third parties to the extent that it is necessary:

- to comply with a government request, court order, or applicable law;
- to prevent unlawful use of our website or violation of the Terms of Use of our website and our policies;
- to protect against claims of third parties;

• to help prevent or investigate fraud.

Transfer to third parties: We transfer your personal data to third parties on the basis of public offer for processing on our behalf, subject to technical and organizational measures to protect your personal data.

6. Do we do data transfer outside the European Economic Area?

The personal data we collect is stored on servers in Amsterdam. By default, the data is stored in Ukraine, but we may need to process your personal data in another country.

7. Do we use cookies?

We use cookies necessary for the functioning of the website. Using cookies, we receive the technical information specified in clause 3 and our Cookie Policy.

If you want to disable cookies, then you can find instructions for managing your browser settings at these links:

- Internet Explorer
- Firefox
- Safari
- Microsoft Edge

- Chrome
- Opera
- Vivaldi

8. What rights do I have regarding my data?

You, as subjects of personal data, have the following rights:

- The right to access information. You can request an explanation of the processing of your personal data.
- The right to opt-out. You have the right to opt out from direct marketing activities
- The right to rectification. You can request the correction of your personal data.
- The right to file complaints. If your request was not satisfied, you can file a complaint to the regulatory body.

To exercise your rights, write us an email at <u>info@purefi.io</u>. We will answer you as soon as possible.

If you have a complaint, you can contact **Privacy Commissioner** by email at communications@pcpd.org.hk, or in person or by mail to: Office of the Privacy Commissioner for Personal Data, Hong Kong: 12/F, Sunlight Tower, 248 Queen's Road East, Wanchai, Hong Kong.

9. EU or EEA users

If you are user from the EU or EEA you have the following rights:

- The right to access information. You can request an explanation of the processing of your personal data.
- The right to portability. You can request all the data that you provided to us, as well as request to transfer data to another controller.
- The right to restrict processing. You may partially or completely prohibit us from processing your personal data.
- The right to rectification. You can request the correction of your personal data.
- The right to file complaints. If your request was not satisfied, you can file a complaint to the regulatory body.
- **Right to be forgotten.** You can send us a request to delete your personal data from our systems.

To exercise your rights, write us an email at info@purefi.io.

If your request was not satisfied, you can file a complaint to the regulatory body, the ICO via live chat service https://ico.org.uk/livechat or https://ico.org.uk/global/contact-us/

10. How do we update Privacy Notice?

This Privacy Notice and the relationships falling under its effect are regulated by the The Personal Data (Privacy) Ordinance (the "PDPO") and GDPR. Existing laws and requirements for the processing of personal data are subject to change. In this case, we will publish a new version of the Privacy Notice on our website. If significant material changes are made that affect your privacy and confidentiality, we will notify you by email or display information on the website and ask for your consent.