

Privacy Notice

Our Privacy Policy informs you about the information we collect from you when you use our website or our app. In collecting this information we act as a personal data operator so we are here to provide you with information about us, the purpose and manner in which we use your data and your rights related to your personal data.

Our data protection policy and practice focuses on the proper processing, exchange and storage of personal information and at the same time ensuring confidentiality, integrity and availability.

Therefore, by reading this privacy policy, you will find out all your rights and all information related to the processing of personal data.

Our Privacy Policy is based on the following data protection principles:

- The processing of personal data will be done in a legal, fair and transparent manner;
- The collection of personal data will be done only for specified, explicit and legitimate purposes, and data will not be further processed in a manner incompatible with those purposes;
- The collection of personal data will be appropriate, relevant and limited to the information necessary for the purpose of the processing;
- All necessary steps will be taken to ensure that incorrect data is erased or corrected without any delay;
- Personal data will be kept in a form that permits identification of the data subject and for a period no longer than the one in which personal data is processed, depending on which kind of data is collected;
- All personal data will be kept confidential and stored in a manner that provides the necessary security;
- Personal data will not be shared with third parties unless it is required for the purpose of providing services;
- Individuals concerned have the right to request access to their personal data, to request the rectification and erasure of their personal data, to oppose or restrict data processing as well as the right to data portability.

Personal data means any information that may be linked to an identified or identifiable individual (subject person). Personal data includes all types of direct or indirect information (that is used in connection with other data) that relate to the subject, such as name, date of birth, addresses, e-mail addresses, telephone numbers etc.

1. Who are we?

Organization Name	CRYPTO ORDERS SRL
Trade Register Number	J08/496/2019
Unique Identification Code/ VAT code	40559983
Headquarters	Gardeniei Street 5, Ghimbav, Brasov County
E-mail Address	support@bmy.guide / legal@bmy.guide
Telephone Number	+40787878700

Any questions about the use of your personal data should be addressed to the above contact data.

2. How do we use your information?

2.1. When you use our website

When using our website or app, we collect the following types of information.

Information you provide us directly:

- Your username, password and e-mail address when you register on the Dashboard section. Profile information that you provide for your account (e.g., first and last name, country). Personal data is collected on registration (on the website registration page. This feature will not be sent to third parties.
- The information you upload for passing the KYC process. This includes name, surname, address, ID Card no/Passsport No.
- Communications between you and bmy.guide. For example, we may send you service-related emails (e.g. account verification, changes/updates to features of our service, technical and security notices). Note that you may not opt out of Service-related e-mails.

We collect information about how you use our products, such as information about the types of content you are viewing or interacting with, the features you use, the actions you take, frequency, and the duration of your activities.

Information about transactions made through our services. If you use our products for purchases or other financial transactions, we collect information about that purchase or transaction. These include payment information such as your personal cryptocurrency wallet address, number and other card information, other account and authentication information, and billing, delivery, and contact information.

Location information. We use location information - such as your current location, where you live, This information can be based on items such as the exact location of the device (if you have allowed us to do so), IP addresses, and the information you provide We do not collect information about your facial characteristics.

Automatically logging in information. You can automatically log into our site each time you visit, rather than manually typing your user name and password every time. That personal information may include your name, email address, mailing address, telephone number, username and password. If you visit our site by "clicking-through" from a site operated by one of our partners, and you have registered with that partner, then certain information about you that you have provided to that partner may be transmitted to us. You should review the privacy policy of the website from which you reached our site in order to determine what information was collected and how you agreed that our partner could use that information. We may or may not retain that information; if we do, then we will only use it in accordance with our privacy policy, regardless of the policy of the partner site from which you came to us.

We use a number of cookies (first-party cookies) and (cookies) to allow the website and app to function, to collect useful information about users and to provide you with the best experience in using our services.

2.2. What are cookies?

Cookies are small text files that are placed on the user's device to track usage and record preferences. Our cookies do not contain information that can identify people. We collect certain automated information using cookies and tracking technologies such as Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), page references/ outputs, pages viewed on our site (e.g. HTML pages, graphics), operating system, date/ time and/or clicks to analyze the trend as a whole and to manage the website/app. Site users can control the use of cookies at the browser level and also through the pop-up bar which allows you to choose the cookies by an opting-in action. Some of the cookies we use are strictly necessary for our site to work and we do not ask for your consent to use them in your computer. These cookies are listed below.

Name of the Cookie	Purpose
XSRF-TOKEN (Essential)	<p data-bbox="737 396 1122 428">Cookie name: XSRF-TOKEN</p> <p data-bbox="737 485 951 516">Session cookie</p> <p data-bbox="737 573 1390 688">This cookie is written to help with site security in preventing Cross-Site Request Forgery attacks.</p> <p data-bbox="737 745 1203 777">Expires at the end of the session.</p>
bmyguide_session (Essential)	<p data-bbox="737 835 1200 867">Cookie name: bmyguide_session</p> <p data-bbox="737 924 951 955">Session cookie</p> <p data-bbox="737 1012 1390 1127">This is used to hold information about your current visit with us. This cookie is essential to the functionality of the site.</p> <p data-bbox="737 1184 1203 1215">Expires at the end of the session.</p>
BMG_BIFR_1_<TOKEN> (Essential)	<p data-bbox="737 1274 1289 1306">Cookie name: BMG_BIFR_3D_<TOKEN></p> <p data-bbox="737 1362 951 1394">Session cookie</p> <p data-bbox="737 1451 1403 1524">This is a load balancing cookie necessary to be able to deliver the best experience for visitors.</p> <p data-bbox="737 1581 1203 1612">Expires at the end of the session.</p>

CloudFlare (Essential)	<p>Cookie name: __cfduid</p> <p>Session cookie</p> <p>The __cfduid cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis.</p> <p>Visit CloudFlare for more information. (https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-Cloudflare-cfduid-cookie-do)</p>
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However, for those cookies that are useful but not strictly necessary, we will always ask for your consent before placing them. These are the following:

Name of the Cookie	Purpose
Statistics Cookies	
First-party cookies	We use cookies to count and track user activity on our site, for example, but not limited to, which pages a visitor has visited, returning visitors, and measure activity on a page.
Preferences Cookies	
First-party cookies	We use cookies to remember different site preferences, for example, but not limited to, whether the menu is closed or not, whether the chat is closed or not, etc.

For more information on using cookies, please visit our Cookie Policy section.

2.3. Automated decisions, profiling and retention of data

We do not use the information you provide through the contact form to make automated decisions that may affect you. The website makes profiling which is used to generate statistics in order to display relevant content and also for targeting purposes.

There are no CRM records made through the site. CRM is an acronym for Customer Relationship Management. A CRM is a software product, a tool for continuous improvement of the customer relationship. It serves a modern business strategy that centres on the customer's needs and knowledge of his needs and requirements. The purpose of a CRM system is to manage unit-related customer or prospective information and to increase their satisfaction level.

We store the data as long as it is necessary to provide our services or until your account is deleted - whichever comes first. This is a case-by-case assessment that depends on factors such as the nature of the data, its purpose of collection and processing, and the relevant, legal or operational needs to keep such data.

We keep emails coming from requests for two years, after which they are safely archived and kept for five years when we delete them. Also, other provided information is kept as long as you use our services. Afterwards, they are deleted.

2.4. The Newsletter Subscription

When you submit a subscription request to our newsletter, we ask for your email address. You will also tick a Commercial Communication Agreement that will briefly show you the categories of processed data, storage duration, and your rights.

We use this information to send you the latest news, projects and other related information.

By subscribing to the newsletter, the data is stored and processed until your consent is withdrawn. You can withdraw your consent at any time by sending a request via email or by clicking on the unsubscribe box at the end of each newsletter that we send you.

Personal data collected is not disclosed to others.

3. Your Rights

You can ask us what information we have about you and ask us to correct it if it is not accurate. If we have asked for your consent to process your personal data, you may withdraw this consent at any time.

If we process your personal data to fulfill a contract or consent, you may ask us to provide you with a copy of the information in a readable format so that you can transfer it to another person.

If we process your personal data on the basis of consent or legitimate interest, you may request deletion of your data.

You have the right to ask us not to use your information for a while if you think we are not doing so legally.

Finally, in some circumstances, you can ask us **not to make decisions that affect you by using your automated processing or profiling.**

All of the rights stated above may be concluded as follows: the right of access to personal data, the right to rectification or erasure, the right to restriction of processing or the right to object to processing, and the right to data portability. Data portability implies your ability to ask us to transfer all data we hold to another person expressly indicated by you.

If you want to send us a request regarding your personal data by email, post mail or phone, use the contact information provided above in the *Who we are* section. We will respond to your requests within 30 days at most.

4. The right to Complain

If you have a complaint about your use of your information, we would prefer to contact us for firstly, so that we can amicably settle the request. However, you can also contact the National Supervisory Authority for Personal Data Processing through their website at <http://www.dataprotection.ro/> or write to:

B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, postal code 010336, Bucharest, Romania

5. Transferring personal data to a third country

We do not intend to transfer personal data to a third (non-EU) country or to an international organization. If this happens, you will be notified to that effect in order to give your consent or to provide you with appropriate safeguards that provide the same protection for the processing of your personal data.

6. Disclosure of Personal Data

Personal data will not be disclosed to third parties except when disclosure is required to provide our services. We occasionally sign contracts with other companies and business partners working on our behalf, such as technical companies for processing and delivering systems and technologies that develop our products and services, and in these cases we will disclose the necessary information. Service providers will be allowed to obtain only the personal data needed to deliver their services. We will not disclose personal data to third parties in order to allow them to market their products and services to our users or customers. If users do not want us to disclose personal data to these companies, they are kindly requested to contact us at the email address indicated above: support@bmy.guide / legal@bmy.guide.

In some cases, we may have to disclose personal data in response to requests from supervisors to meet legal requirements. We will also disclose personal information if required by law, for example to comply with a summons or other legal process, when we appreciate that data disclosure is required to protect our rights, our customers'/users' safety or the safety of others, the investigation fraud or in response to a request from public authorities.

7. Security of Processing the Personal Data Collected

We will process the data safely, apply and maintain appropriate technical measures to protect your personal data against accidental or unlawful destruction or loss, unauthorized alteration, disclosure or unauthorized access, especially when processing involves the transmission of data over a network as well as against any other form of illegal processing. Questions about personal data security can be sent to the email address indicated above: support@bmy.guide / legal@bmy.guide.

Specifically, the data on the website/app is collected securely through HTTPS over, at least, TLS v1.1, or higher, stored in BMyGuides databases.

All internal communication are encrypted and secure and all access to user data will be logged.

Possible marketing emails can only be sent with your express consent. This specific form of consent must be given freely, specifically and precisely informed. These requests are met when you opted to receive marketing emails (you have actively approved).

You will always have the right to object, on request and at no cost, to the processing of personal data for direct marketing purposes without having to provide concrete justification. Marketing emails contain information that we find interesting for you as well as cutting-edge news about our products and services.

8. Children's Privacy

This website is a general audience site, and we do not knowingly collect information about children. Should a child whom we know to be under 18 send personal information to us, we will use that information only to respond directly to that child to inform him or her that we must have parental consent before receiving his or her personal information.

9. Updates to this Privacy Policy

We regularly review and, if necessary, periodically update this privacy policy when the changes occur. If we want to use your personal information in a way that we have not

previously identified, we will contact you to provide you with information about it and, if necessary, to request your consent.

We will update the version number and date of this document each time it is modified.

Policy approval date	14/05/2019
The policy becomes operational from the date of	14/05/2019
The next review review of the Privacy Policy	14/12/2019

Our data protection policy and practices focus on the proper processing, exchange and storage of personal information while ensuring confidentiality, integrity and availability and we are trying to fully comply with the General Data Protection Regulation ("GDPR"), (Regulation (EU) 2016/679).

For any further questions regarding the way personal data is processed, please send us your requests by mail at our headquarters in Ghimbav, No.5 Gardeniei Street, Brasov County, Romania, telephone no. [+40787878700](tel:+40787878700) or to the e-mail address: support@bmyguide.com or legal@bmyguide.com.