

Personal Data Processing Policy

The purpose of this document is to provide you with information explaining **how our company handles your personal data** we collect from you when you use our website and services.

The processing of personal data is governed in particular by 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 persons and repealing Directive 95/46/EC (General Data Protection Regulation) – hereinafter as "GDPR", and Act No. 110/2019 Coll. on the processing of personal data, as amended by later regulations.

This document provides information on:

- Who processes your personal data?
- Who can you contact if you have any questions about the processing of your personal data?
- Whose personal data do we process?
- What personal data do we collect?
- How do we collect your personal data?
- Do we record phone calls?
- On what legal basis do we process your personal data?
- Do we keep copies of identity documents?
- How do we use your personal data?
- Do we transfer personal data to third parties?
- Do we process personal data through profiling or automated decision-making?
- How do we store your personal data?
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Who processes your personal data?

We, joint controllers of personal data who are:

1) Mountain Wolf s. r. o., CIN 52 227 723, registered office Vajnorská 100/B, Bratislava, CIN 52 227 723,

2) MOUNTAIN WOLF LLC, BIN: 400370941, registered office Georgia, Tbilisi, Omar Khizanishvili Street, N 264, Tbilisi Technology Park Free Industrial Zone,

3) MOUNTAIN WOLF PSP FZCO, registration No.: DSO-FZCO-4829, Dubai Silicon Oasis, DDP, Building A2, Dubai, United Arab Emirates,

4) TOO Mountain Wolf, registered office K.Amazholov Street 174, 090000 Uralsk, Kazakhstan (hereinafter as the "Controller" or the "Company"), are the controller of your personal data.

Who can you contact if you have any questions about the processing of your personal data?

If you have any questions about the processing of your personal data or cookies by the Company or would like to exercise any of your data protection rights, please do not hesitate to contact us.

To contact any of the joint controllers, please use this joint email: legal@mountainwolf.com

In the subject line of the email, please specify which of the joint controllers your inquiry concerns, if this information is relevant or known to you.

The Controller has appointed a **personal data protection officer**, which is the company **KOPEČNÝ & PARTNERS s.r.o., attorney-at-law office**, with a specifically designated person to carry out the work of the officer: **Mgr. Bc. Petra Juřátková** (hereinafter referred to as the "trustee").

Contact details of the trustee: KOPEČNÝ & PARTNERS s.r.o., law firm, with registered office at Stará 98/19, 620 00 Brno, the Czech Republic, ID number: 077 20 653, e-mail: povenerec@kopecnypartners.com, telephone: +420 778 886 293.

Whose personal data do we process?

We process the personal data of:

- **A potential customer**
- **A customer**
- **A visitor to our website** (in conjunction with Cookies)

The processing of personal data only concerns natural persons, regardless of their nationality or place of residence, and regardless of whether they are entrepreneurs or consumers. When the Company comes into contact with the data of legal entities, the processing of personal data may concern, for example, natural persons – employees, statutory bodies, beneficial owners, and other natural persons.

What personal data do we collect?

Our company only processes your personal data where it has the legal authority to do so, in a fair and transparent manner. We only collect your personal data for the intended purpose, in a secure manner and only for as long as is necessary in relation to the specific purpose of the processing.

If you are a visitor to our website, our company processes

- IP address
- Date and time of the request
- Necessary cookies unless you give us your consent to process other cookies

If you are a potential customer, our company processes the personal data you have provided to us including in particular:

- First name, surname
- Phone number
- E-mail address
- Cookies, IP address

Our company only stores data if the respective communication is based on a contractual basis. Data with regard of normal enquiries are not stored. Otherwise, the processing is limited in the event that there are legal retention obligations.

If you are a customer, our company processes all the personal data you have provided to us in connection with the entry into, continuation and termination of the contract between you and our company in any form. This in particular includes the following personal data:

- First name, surname, date of birth, birth certificate number, identification number for entrepreneurs, permanent address, nationality,
- Phone number, e-mail address, contact address (if different from your permanent address),
- ID card number, including information on the validity of the ID card or other document which can be used to verify your identity (for example, a residence permit),
- a copy of the identity card or other proof of identity,
- photographs/videos,
- IP address, cookies, e-mail address,
- bank account numbers,
- records of communications between us and you.

Our company only stores data, if it is necessary for the performance of a contract or for the entering into a contract, if it is necessary for compliance with a legal obligation, if it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the company, or if it is necessary for the purposes of the legitimate interests pursued by the company or by a third party.

How do we collect your personal data?

Most of the personal data we process have been directly provided to us by you or otherwise transmitted to us. We collect and process personal data in particular when:

- you use or view our website using your browser's cookies,
- you contact us,
- you enter into a contract with our company or you are in pre-contractual negotiations with our company.

Furthermore, our company is also entitled to process personal data that you have communicated to us in any way or that you have provided to our company's processor.

Our company is also entitled to process the personal data necessary for the provision of services to our customers, i.e. you, to the extent of the data obtained by our company (or our processor) from publicly available sources or from third parties in connection with the entry, continuation and termination of the contract between you and our company.

On what legal basis do we process your personal data?

Your personal data is processed:

- with your consent to the processing of your personal data,
- for the performance of a contract to which you are a party or for the implementation of measures taken prior to the conclusion of a contract to which you are a party,
- for the purpose of complying with any legal obligation to which our company or a third party whose services are used by our company for the performance of the contract is subject,
- for legitimate interests of our company or the third party.

Personal data (information, media containing personal data) can also be used as evidence.

Do we keep copies of identity documents?

We use a copy of your ID card or other identification document to identify you. Providing a copy of your ID card or other proof of identity increases the security and credibility of the services we provide

to you. We make copies on the basis of an obligation established by law, or for reasons of fulfilled public interest.

How do we use your personal data?

Our company collects your data mainly for the following purposes:

- verification of your personal data,
- performance of a contract between our company and you or to carry out measures taken prior to the conclusion of a contract to which you are a party,
- profiling and use of your personal data for the purpose of profiling a subsequent commercial offer,
- compliance with statutory obligations,
- customer support,
- protecting the legitimate interests of our company and third parties,
- asserting legal claims and obligations under the contractual relationship between our company and you,
- sending commercial communications.

Do we transfer personal data to third parties?

In particular in connection with the performance of a contract between our company and you and in connection with the performance of the obligations set out in the relevant legislation or if necessary to protect the rights and legally protected interests of our Company, we are entitled to transfer personal data to third parties. Separate data processing contracts were formed with these third parties in order to ensure the security of your personal data.

The recipients of personal data include in particular the following controllers and processors such as:

- IT service providers,
- providers of filing and archiving services,
- providers of significant activities (outsourcing),
- lawyers – such as KOPEČNÝ & PARTNERS s.r.o., law firm, ID number: 077 20 653, with registered office at Stará 98/19, 620 00 Brno, the Czech Republic,
- providers of printing and mailing services, including couriers,
- and others.

Among the controllers/processors involved in the processing of personal data are:

As an Accountant - SLC-Europe & Partner s.r.o., ID number: 46761381, registered address: Štefánikova 7, Bratislava 811 06, Slovakia

As a KYC & KYB Provider - UAB “iDenfy”, registered office address: Baršausko street 59, 51423 Kaunas, Lithuania

For Compliance - Coinfirm Limited, registered in England: 10027965, registered office address: 189 Brompton Road, London, SW3 1NE, United Kingdom

For IT services - PROSALES Softwaresysteme GmbH, registered office address: Am Stadtbrunnen 8, D-63128 Dietzenbach, Germany

For Card Services - Card Compact Ltd., registered office address 483 Green Lanes, London N13 4BS, United Kingdom

For Marketing - Hector Esteban Bedoya Serna, ID number: 53810481, Zálužická 100/3, 82101 Bratislava-Ružinov, Slovakia

As Banking partners - AlphaPay, UAB, EASY PAYMENT AND FINANCE, EP, S.A., Mobilum, UAB

Further specifications of processors and other recipients will be provided upon your request.

Our company wishes to point out that it is not responsible for the processing of personal data by third parties who are in the position of a controller. Such processing of personal data will be subject to the third party's own data protection policy in its capacity as a controller.

Personal data may be transferred to third countries outside the EU in the event that it is necessary for the performance of the contract and the administrator's processor, or a cooperating person of the administrator is from a country outside the EU.

Does the processing of personal data involve profiling or automated decision-making?

Personal data are processed systematically and automatically by our company, and we also use profiling, which means any form of automated processing of personal data with the aim to evaluate certain personal aspects relating to a natural person.

How do we store your personal data?

Our company complies with the relevant IT security legal standards to ensure data and system security and monitor their compliance and implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk.

For how long do we process your personal data?

We process personal data for different periods of time depending on their purpose. Unless the length of processing is determined by the consent given by you, we process personal data only for the time necessary to fulfil the purpose of processing or to comply with legal obligations.

Unless otherwise stipulated below, the personal data will be deleted by us within a maximum of one year after the purpose or legal basis for processing has expired.

Personal data that are subject to archiving obligations are processed for the period of time stipulated by the relevant legal regulations.

Personal data processed on the basis of your consent will be erased following your written request, at the latest within 1 month of receipt of such request (withdrawal of consent). The processing of personal data prior to the withdrawal of the consent is not affected. Withdrawal of consent does not prevent us from further processing personal data on the basis of another legal ground.

You can withdraw your previously granted consent to the processing of personal data by e-mail at: legal@mountainwolf.com

Do we process personal data for marketing purposes?

Our company would like to send you information about our products and services we think you might like. The processing of personal data for the purpose of sending marketing communications is based

on our company's legitimate interest, although you are entitled to tell us at any time that you are no longer interested in receiving further marketing communications from us. In that case, we are obliged to stop sending you marketing communications immediately. However, the processing of personal data for other purposes is not affected.

If you no longer wish to be contacted for marketing purposes, please use unsubscribe link in the bottom of the marketing email and we will process your request immediately.

Do we process cookies?

Cookies are text files placed on your computer that collect standard Internet protocol information and information about visitor behavior.

We can only store cookies if they are necessary for the operation of our website. Otherwise, we need your consent.

There are a number of different types of cookies. Some cookies are placed by third-party services that appear on our website.

Specifically, our website uses the following third-party cookies:

- Necessary cookies - help the website to be usable by enabling basic functions such as page navigation and access to secure sections of the website. The website cannot function properly without these cookies.
- Statistical cookies - help website owners understand how visitors use the website. They collect and share information anonymously.

Necessary cookies can be stored on your device without your consent. We need your permission for all other types of cookies.

You can change or withdraw your consent at any time via the POP-UP WINDOW on our website.

Do we process data based on the integration of social media links?

The Company's website contains links to the following social media channels: Facebook, YouTube, VK. You can recognize these links by the respective company logo of the social media provider. When you click on the link you will be redirected to Company's account on the respective social media channel. Only at this point will data be processed by the respective provider of the social media channel. You can learn about this processing of your personal data when using the website from the data protection information:

- Facebook, full data policy can be found here: <https://www.facebook.com/privacy/policy/>
- YouTube (is a subsidiary of Google LLC). Information on the processing of personal data can be found here: <https://policies.google.com/privacy?hl=cs>
- Instagram, full data policy can be found here: <https://privacycenter.instagram.com/policy>
- X, full data policy can be found here <https://twitter.com/en/privacy>
- Telegram Messenger, full data policy can be found here: <https://telegram.org/privacy/eu>

If you follow the links while visiting our website and are logged into your personal account on the linked social media channel, the information that you have visited our website will be transmitted to the respective social media channel. The social media providers can also link your visit to the website

with your account. This information is sent to the social media providers and stored there. In order to prevent this, you must first log out of your respective account before clicking on the social media link.

What are your data protection rights?

We want to make sure that you are fully aware of all your data protection rights. You are entitled to:

- request access to the personal data processed by us,
- ask us for a copy of that personal data,
- ask us for confirmation of the personal data we are processing, in particular to tell you the purpose of the processing, the category of the personal data concerned, the recipient or category of recipients, the period of processing/storage of the personal data, information about the source of the personal data, and whether automated decision-making, including profiling, is taking place,
- ask us to correct or supplement inaccuracies,
- ask us to erase personal data processed by the controller if they are no longer necessary for the purpose provided or if they are processed unlawfully by us,
- ask us to restrict the processing of your personal data in the cases set out in Article 18 of the GDPR,
- the portability of your personal data,
- object under Article 21 of the GDPR.

If you believe that we are processing your personal data in violation of your rights or the law, you can:

- request an explanation,
- request that the unlawful situation be rectified,
- file a complaint with the supervisory authority, which is the Office for Personal Data Protection.

If you make any of the above requests or demands, we will respond to you within 30 days of receiving your request(s).

If you wish to exercise any of the above rights, please contact us via email legal@mountainwolf.com

Please note that the Policy may be updated from time to time. If we make any changes to the Policy, we will notify you so that you can tell us your opinion of the change. If you choose not to agree to the change, it is possible that we may no longer be able to process your personal data, which could result in us being unable to provide you with our services.

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