

# Privacy policy

## INTRODUCTION

Welcome to Elfronus Company LTD privacy notice.

Elfronus Company LTD respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you

- visit our website <https://waves.exchange/> or its subdomains (collectively “**Website**”)
- complete surveys and subscribe for the newsletters, communicate with our team (“**Voluntary provision of data**”); and/or
- use our services (such as Waves Exchange, Waves Keeper, collectively “**Services**”)

and tell you about your privacy rights and how the law protects you.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Elfronus Company LTD collects and processes your personal data through your use of the Website and/or Services and/or Voluntary provision of data, including any data you may provide and/or we may collect through your use of the Website, the Services and/or when you sign up to our newsletters, complete our surveys and/or communicate with our support service.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Elfronus Company LTD is responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy notice). Our office is situated at Suite 1, Second Floor, Sound & Vision House, Francis Rachel Str., Victoria, Mahe, Seychelles.

### CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 18/11/2019.

We may update this Privacy policy from time to time. The updated version will be indicated by the date of the last update above. If we make material changes to this privacy policy we may notify you thereupon by posting a notice at the Website and/or Services or by sending notification to you directly. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**Information You Give Us:** This is information about you that you give us by filling the forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you enter on our Website, provide to us through the Services or through means of Voluntary provision of data or give us in any other way.

You provide such information when you:

- use our Website and Services,
- fill the forms and inquiries,
- subscribe to our newsletters,
- fill out a survey,
- participate in (sign up to) any contest, promotional activity, giveaway, events, education, career, partnership offers,
- communicate with our support service, give us feedback (for example, when you communicate with us by customer support form, e-mail, phone, mail or otherwise)

As a result of those actions, you might supply us with such information as your name, address, e-mail, phone number, information regarding your waves wallet(s) and the cryptotokens you have, and other data.

**Automatic Collection of Information:** We receive and store certain types of information automatically whenever you interact with us.

As you interact with our Website and/or Services, we may automatically collect technical data about your equipment, browser features, browsing actions and patterns. For example, like many websites, at the Website and Services we use "cookies" and other similar tools and identifiers for analytics and marketing (like web beacons and pixels), and we obtain certain types of information when you access our Website and/or our Services (access log records such as date, IP address, user agent). Please see our [Cookie policy](#) for further details.

We also collect, use and share **Aggregated Data** such as statistical data, anonymous customer behavior data for any purpose. However, Aggregated Data is not considered personal data as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

**Information from Other Sources:** We might receive information about you from other sources (such as public databases, marketing partners and other third parties) and add it to our account information (this concerns technical data from the following parties: analytics providers such as Google based outside the EU; advertising networks; and search information providers). We will inform you about the source of information and the type of information we have collected about you within a reasonable period after obtaining the personal data, but at the latest within a month.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We also do not knowingly collect data relating to minors and the Website, Services and means of Voluntary provision of data are not intended for children. If we learn that any personal information of anyone under the age of majority has been collected, we will take the reasonable measures to promptly delete such data from our records. If you become aware of any data we received from persons under the age of majority, please contact us at [support@waves.exchange](mailto:support@waves.exchange).

### 3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Your consent.** We may process your data when you consented for the use of such data by us.

- **Legitimate Interests.** We may process your data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override them. For instance, for provision of Website and Services to you, for the development of business, to procure compliance with our terms and policies.
- **Legal obligation.** Where we need to comply with a legal or regulatory obligation (for example, to comply with applicable law, governmental requests, a judicial proceeding, court order, legal process, enforcement requirements). We may also disclose your information where it is necessary to investigate, prevent or take action regarding potential or suspected fraud, illegal activities, situations involving potential threats to safety.

Please see more details about the specific purposes for the processing of your personal data in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide and enable your usage of the Website and the Services	(a) Identity (b) Contact (c) Technical & statistics (d) Usage, customer behavior	(a) Your consent  (b) Necessary for our legitimate interests (to study how users use our website, to develop it and grow our business)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Providing support	(e) Identity (f) Contact	(a) Your consent  (b) Necessary to comply with a legal obligation
To enable you to partake in a contest, competition, promotional activity or complete a survey	(a) Identity (b) Contact (c) Usage, customer behavior (d) Marketing and Communications	(a) Your consent
To administer and protect our business, the Website and the Services (including technical support, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Technical & statistics (b) Usage	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud)  (b) Necessary to comply with a legal obligation

To use data analytics to improve our Website, Services, marketing, customer relationships and experiences and deliver relevant content and services to you	(a) Technical (b) Usage (c) Marketing and Communications	(a) Your consent  (b) Necessary for our legitimate interests (to study how users use our Website, to develop it, to grow our business and to inform our marketing strategy, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To send you newsletters, invitations to events, promo and marketing communication, to discuss possible partnership and cooperation	(a) Identity (b) Contact (c) Marketing and Communications	(a) Your consent  (b) Necessary for our legitimate interests (to study how users use our Website, to develop it, to grow our business and to inform our marketing strategy, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To provide you customer support and services, respond to your inquiries	(a) Identity (b) Contact	(a) Your consent  (b) Necessary for our legitimate interests (customer and business development)
To enforce our terms, conditions and policies for business, contractual and legal reasons	(a) Identity (b) Contact (c) Usage (d) Technical	(a) Your consent  (b) Necessary for our legitimate interests (for compliance, provision of administration and security, to prevent fraud)

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### 4. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for a reason compatible with the original purpose. If you wish to get an explanation as to how the processing for how the purpose of processing of your data is compatible with the original purpose, please contact us via e-mail [support@waves.exchange](mailto:support@waves.exchange).

If we need to use your personal data for an purpose not related to the purposes stipulated here, we will notify you and we will explain the legal basis which allows us to do so.

#### 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- **Third Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to perform such work (for example, for development and technical support and maintenance of the Website and Services, organizing of promotional and marketing activities, data analysis, email delivery, hosting services, customer service).
- **Business Transfers.** Third Parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- **Affiliates.** We may share your information with our affiliates (including parties that we control, controlled by or under common control with us).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and this Privacy Policy. We do not allow our third-party service providers to use your personal data for their own purposes, share it with third parties and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

Please note that your information may be transferred, stored and processed by us and by those third parties with whom we may share your information in various countries, including outside European Economic Area, EEA (e.g. Russian Federation). If you are a resident of European Economic Area, than those countries may not have data protection or other laws as comprehensive as those in your country. These countries may have less stringent privacy laws than we do, so any information they hold can become subject to their laws and disclosure requirements, including disclosure to governmental bodies, regulatory agencies and private persons. In addition, a number of countries have agreements under which information is exchanged with other countries for law enforcement, tax and other purposes.

We will however take all necessary measure to protect your personal information in accordance with this Privacy policy and applicable law and requiring all our contractors to follow the same rules when processing your personal data.

Please contact us via e-mail [support@waves.exchange](mailto:support@waves.exchange) if you want further information on the specific mechanism used by us when transferring your personal data outside of the EEA.

## **7. DATA SECURITY**

We have put in place appropriate technical and organizational security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

However, please remember that the transmission of data over the internet (including by e-mail) is never completely secure. So, although we use appropriate measures to try to protect your personal data, we cannot guarantee the security of data transmitted to us or by us. You should only access the Website and the Services and/or transmit your data otherwise within a safe environment.

## **8. DATA RETENTION**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, unless a longer retention periods required or permitted by law (such as any any legal, accounting, or reporting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete it or anonymize it, or, if it is not possible (for example, if your data is stored in backup systems) securely store it until the deletion is possible. If in some circumstances we anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to or restrict processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data (data portability)*
- *Right to withdraw consent.*

If we are relying on your consent to process your personal data you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent. Please note that in certain circumstances it may be still lawful for us to continue processing your information even where you have withdrawn your consent, if one of the other legal bases is applicable.

No fee usually required. You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

If you wish to exercise any of the rights set out above, please contact us via e-mail [support@waves.exchange](mailto:support@waves.exchange).

## **10. THIRD-PARTY LINKS**

The Website, Services and means of Voluntary provision of data may include links to third-party websites and services, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and services and are not responsible for their privacy statements. When you leave the Website and/or Services and/or use means of Voluntary provision of data ran/built on or hosted by third-party services, we encourage you to read the privacy notice of every third-party website and service you visit.

## **11. COOKIES**

We may use cookies and similar tracking technologies (like web beacons and pixels) to access and store information. You can set your browser to refuse all or some browser cookies, or to alert you when the Website or Services set or access cookies. If you disable or refuse cookies, please note that some parts of the Website or Services may become inaccessible or not function properly. For more information about the cookies we use and how you can refuse please see [Cookie Policy](#).

## 12. CONTACT US

If you have questions or comments about this Privacy Policy or the handling of your personal data by us, email us at [support@waves.exchange](mailto:support@waves.exchange).