

# Privacy policy

## INTRODUCTION

Welcome to the WX Development Ltd's privacy notice.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us or our contractors. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By participating in the promotional activity «Waves Exchange Cashback Campaign» (Promotional Activity), you are accepting and consenting to the practices described in this policy.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how WX Development Ltd collects and processes your personal data when you take part in the Waves Exchange Cashback Campaign (Promotional Activity), including any data you may provide through the Telegram messenger (chat bot [@waves\\_exchange\\_bot](#)) or communicating with our support team.

The Promotional Activity is not intended for children and we do not knowingly collect data relating to children.

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.

WX Development Ltd is responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy notice).

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

This version was last updated on 21/03/2020.

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:** In order to participate in Promotional Activity you must use Waves Exchange available at <https://waves.exchange/> and register you Waves Exchange's wallet address via Telegram messenger. We will require you to provide us with your Waves Exchange's wallet address.

We also receive and store information you enter into the Telegram messenger chat bot ([@waves\\_exchange\\_bot](#)) or give us when you communicate with our support team by post, e-mail, or otherwise. As a result of those actions, you might supply us with such information as your Telegram accounts, your identity data, Waves Exchange's wallet address, your first name and last name, e-mail, phone number, address, and other possible

data. We may also receive some information from your Telegram accounts (e.g. your first name and last name, date of birth, e-mail, phone number, etc).

**Automatic Information:** As we use the Telegram messenger chat bot (@waves\_exchange\_bot), Telegram Messenger Inc. may receive and store certain types of information whenever you interact with us via the form. For example, cookies, server logs and other similar technologies. For more information about Telegram Privacy Policy see <https://telegram.org/privacy>.

**Information you give our counterparts:** In order to buy tokens for fiat money on Waves Exchange, you will be referred to ADVANCED CASH LIMITED. As a result of those actions, you might be required to provide your first name and last name, occupation, address, email address, phone number, date of birth, bank or payment card details, as well as the documents confirming the your identity and residence address, information related to the transactions and other data necessary to comply with legal obligations regarding financial services. For more information about ADVANCED CASH LIMITED Privacy policy see <https://advcash.com/en/confidential/>

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.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you. We will collect and process the following data about you:

**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 provide when you:

- Create an account Waves Exchange available at <https://waves.exchange/>
- Fill the form of our Telegram messenger chat bot @waves\_exchange\_bot
- Communicate with our support team.

**Information you give to third parties to use our services.** In order to participate in Promotional Activity you will be referred to third parties' services, namely Telegram messenger and ADVANCED CASH LIMITED. Those entities will require you to provide some of you personal data, according to their privacy policies available at <https://telegram.org/privacy> and <https://advcash.com/en/confidential/>

**Automated technologies or interactions.** As you interact with Telegram messenger chat bot, Waves Exchange and ADVANCED CASH LIMITED they may automatically collect Technical Data about your equipment, browsing actions and patterns as well as data necessary for your using of the services according to their privacy policies.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below: Telegram Messenger Inc. and ADVANCED CASH LIMITED.

### 4. 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:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation: laws or regulation may set a minimum period for which we have to keep your Personal Data.

If you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) To provide you with support within the Promotional activity	(a) your Telegram messenger ID  (b) your Waves Exchange's wallet address	Necessary to comply with a legal obligation
To enable you to partake in the Promotional Activity and to verify your compliance with requirements set forth in clause 7 of Terms for Crypto Cashback Applicable to the Users of New Waves Wallets (Terms).	(a) your Telegram messenger ID  (b) your Waves Exchange's wallet address	Necessary for our legitimate interests and your interests:  <ul style="list-style-type: none"> <li>• To enable you to take part in the Promotional Activity and to verify your compliance with requirements set forth in clause 7 of Terms for Waves Exchange Cashback Campaign.</li> <li>• To deliver crypto Cashback and determine winners of the Promotional Activity and deliver them Promo Gift.</li> </ul>

## **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 another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us via e-mail [contact@waves.exchange](mailto:contact@waves.exchange).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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.

## **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 Parties who help us to verify your compliance with requirements set forth in clause 8 of Terms.
- 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.

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

## 6. INTERNATIONAL TRANSFERS

We share your personal data with our contractors to fulfil the purposes we collected it for. This will involve transferring your data outside the European Economic Area (**EEA**), namely to the Russian Federation and the United States.

We ensure your personal data is protected by requiring all our contractors to follow the same rules when processing your personal data.

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

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised 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.

## 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, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances you can ask us to delete your data (*Request erasure*).

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Obtain information regarding the processing of your Personal Data*
- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

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

### 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).

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right

only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.