



Wealth99 Exchange – VERSION 2024.09

Privacy Policy

The Wealth99 Exchange is operated by Wealth99 UAB. For the purposes of this Privacy Policy, Wealth99 UAB is also the data controller.

Wealth99 will value your privacy and strive to protect your personal information. The term “personal information” refers to any information from which your identity could be reasonably ascertained. In this Privacy Policy, personal information is also known as ‘personal data’ for data subjects in the European Union (EU). We will only collect and use your personal information in accordance with this Privacy Policy and the terms of your agreement with Wealth99 (Terms and Conditions). If you need further information, please contact hello@wealth99.com.

By visiting, accessing, or using the Wealth99 Exchange, you have confirmed that you are 18 years old or older, have the legal capacity to consent to this Privacy Policy, and agree to be bound by this Privacy Policy.

The personal information we collect

The personal information we collect enables us to deal with your enquiries, open and operate an account for you, or to generally provide you with our products and services and comply with laws and regulations. We may need to and may be required to record, hold, use, disclose and store the following information:

- Personal information used to establish your identity and background.
- Personal information provided when you use the Wealth99 Exchange

How we collect your personal information

Wealth99 obtains personal information in various ways:

- When you register an account with Wealth99 through the website.
- When you respond to marketing initiatives from Wealth99 or its independent marketing partners.
- Through the information provided by you when using our products or services.
- Through the information provided by you when taking part in customer surveys, competitions and promotions.
- We analyse information based on your transactions. Wealth99 also analyses the payments which are made to/from your account.
- We monitor calls, emails and letters when you call our help desk or send queries.
- We may collect data and information from third parties like credit reference agencies or regulatory and enforcement agencies or from other sources for which you have given consent to disclose information relating to you and/or where information is not otherwise restricted.



Chatbot Integration

Our website/app includes a chatbot feature powered by Hubspot, designed to provide assistance, answer questions, and improve your experience with our services. This section outlines how we handle your information when you interact with our chatbot in compliance with the EU General Data Protection Regulation (GDPR).

Information Collection

When you interact with our chatbot, we may collect the following types of information:

- **Personal Data:** Your name and email address.. More sensitive information will be collected through an external link handled by our Customer Support (CS) team.
- **Chat Data:** Messages, questions, responses, and any other interactions with the chatbot.
- **Usage Data:** Information about your use of the chatbot, such as session duration, frequency of use, and navigation patterns.

If cookies are not accepted and you do not consent to data collection, any data collected during your interaction will be lost upon refreshing the page.

Purpose of Data Collection

The personal data collected through the chatbot is used to:

- Provide and improve the chatbot service.
- Speed up service and automate part of our customer service processes through the Customer Support team.
- Respond to your inquiries and provide customer support.
- Analyse chatbot performance and enhance our services.
- Detects and prevents any fraudulent or malicious activity.

Legal Basis for Processing

We process your personal data collected through the chatbot based on your consent, which you provide when you interact with the chatbot. You may withdraw your consent at any time, which will not affect the lawfulness of processing based on consent before its withdrawal.

Data Sharing and Disclosure

We will not share your chatbot interactions with third parties except in the following circumstances:

- With service providers, including Hubspot, who assist us in operating the chatbot, under strict confidentiality agreements and with appropriate safeguards in place to protect your data.
- If required by law or to comply with legal processes.
- To protect the rights, property, or safety of Wealth99, our users, or others.

Data Retention

Chatbot interaction data is retained for as long as necessary to fulfil the purposes outlined in this

policy or as required by law. You have the right to request deletion of your personal data at any time by contacting us at hello@wealth99.com. We are capable of deleting or amending any information collected by the chatbot; for example, when finalising tickets, we can delete customer data, but it is important to preserve the history for future assistance.

Your Rights

Under the GDPR, you have the right to:

- Access and receive a copy of your personal data collected through the chatbot.
- Request correction of any inaccurate or incomplete information.
- Request deletion of your data or restrict its processing.
- Withdraw your consent for data processing at any time.
- Object to the processing of your personal data collected via the chatbot.
- Receive your personal data in a commonly used electronic format or request the transfer of such data to another service provider.
- Lodge a complaint with a data protection supervisory authority if you believe your rights under the GDPR have been violated.

If you wish to exercise any of these rights, please contact us at hello@wealth99.com

How we use your personal information

Personal information is used for the following purposes:

- To verify your account in accordance with Know Your Customer (KYC) and Anti-Money Laundering (AML) regulations.
- To assess your application for our products and services.
- To manage and maintain your account with us.
- To better manage our business and your relationship with us.
- To enable your referrer to understand your information.
- To improve our products and services and to develop new products and services.
- To notify you about benefits and changes to the features of products and services.
- To administer offers, competitions and promotions.
- To respond to your enquiries and complaints and to generally resolve disputes.
- To update, consolidate and improve the accuracy of our records.
- To produce data, reports and statistics, which have been anonymous or aggregated in a manner that does not identify you as an individual.
- To conduct research for analytical purposes including but not limited to data mining and analysis of your transactions with us.
- To meet the disclosure requirements of any law binding on Wealth99.
- For audit, compliance and risk management purposes.
- To assess financial and insurance risks.

- To conduct anti-money laundering checks, for crime detection, prevention and prosecution.
- For any other purpose that is required or permitted by any law, or relevant regulatory authorities.

Please be assured that we will ask for your consent before using your personal information for purposes other than those set out in this Privacy Policy and the Terms and Conditions.

Automated processing of your personal information

In some situations, we may use your personal information to help us make automated decisions to further improve our business or provide you marketing that we think is relevant to you. For example, we might segment you based on elements of your profile (age, location, gender, transaction history), your answers to our surveys or your behaviour on our site and personalise our correspondence to you.

Disclosure of your personal information

To comply with legal and regulatory requirements we may be required to disclose information about you and/or your account details to the following third parties:

- Banks, payment service providers and KYC partners
- Organisations and companies that act as our agents, affiliates and/or professional advisors.
- Organisations and companies that assist us in processing or otherwise fulfilling transactions that have been requested.
- Law enforcement, regulatory and government agencies.
- Affiliates who introduce you to Wealth99 may receive limited information about your account and transactions

The aforementioned third parties may in some instances be located outside your registered country.

Otherwise, we will treat your personal information as confidential and private and will not disclose your information to anyone outside the Wealth99 group.

We may share your personal information in circumstances such as:

- Where you have given permission.
- Where we are required or permitted to do so by law.
- Where required or authorised by any order of court or tribunal with jurisdiction over Wealth99.

- Where we may transfer rights and obligations pursuant to our agreement with you.
- Where we are required to meet our obligations to any relevant regulatory authority.

Transferring your information

Wealth99 UAB is registered in Lithuania and operates in the EU, but we use the services of a number of third parties that are based outside the EU. Accordingly, your personal data may be stored, transferred, and processed in countries outside of the country of your residence.

We take the utmost care when we're transferring your personal data, including ensuring that the third party receiving your personal information has proper safeguards for your information and will only process your personal information in the manner in which we stipulate.

The secure storage of your personal information

Wealth99 places the greatest importance on providing strict security measures to protect your personal information. Wealth99 will review and implement up to date technical and organisational security measures when processing your personal information. Employees of Wealth99 are trained to handle your personal information securely and with the utmost respect, failing which they may be subject to disciplinary action.

The retention of your personal information

Wealth99 will retain information in compliance with this Privacy Policy and the Terms and Conditions of your agreement with Wealth99 for the duration of your relationship with us, and afterwards for such period as may be necessary to protect the interests of Wealth99 and its customers, and as required by Wealth99's relevant policies, and as required by the law.

How you can access and update your personal information

You have a right to access your personal information. Please contact Wealth99 customer support to do this. Wealth99 will take steps to verify your identity before fulfilling the request.

In the case of changes to your customer data or where it has not been updated, you will need to contact Wealth99 support to update your personal information. Wealth99 may use its discretion in allowing the corrections requested and/or may require further documentary evidence of the new information to avoid fraud and inaccuracy.

Special provisions related to European Union (EU) data subjects



The European Union General Data Protection Regulation (GDPR) offers data subjects from the EU additional rights when it comes to their personal data. This next section outlines these additional rights, but please note, this additional section for EU data subjects must still be read in conjunction with this Privacy Policy.

Our relationship with you

Wealth99 UAB is a data controller for crypto asset transactions on the Wealth99 Exchange. As data controllers, we determine the purposes and means of processing personal data in respect of crypto assets and crypto account funding transactions.

The legal basis of processing your personal data

We process your personal data on the basis of consent, which you grant to us when you sign up for our service or access the website. We also process your personal data to perform our contractual obligations under the Terms and Conditions. Where we aggregate your personal data to improve our service, we're doing so because of a legitimate interest to provide a better experience for you.

Recipients or third-party processors of your personal data

We use a number of third parties to provide the best possible service to you. This includes:

- Google, which we use for analytics, remarketing and website tracking;
- Facebook, Instagram & LinkedIn which we use to provide remarketing advertisements and special offers that we deem relevant to you;
- Intercom, to offer you personalised live chat support when you use the website. Intercom also helps us send our automated transaction emails, for example, when one of your transactions is confirmed on the Wealth99 Exchange.
- Zendesk, which our customer experience teams use for your support requests;
- External KYC provider, the company that verifies your identity; letting you buy and sell crypto assets on the Wealth99 Exchange .
- Hubspot, which we use for marketing and analytic purposes.

Restricting, objecting or withdrawing your consent to the processing of your personal data

You may withdraw your consent for us to process your personal data at any time. You may also request that we restrict the way we process your personal data. You can do this by contacting us using the details at the bottom of this Privacy Policy.

How long we keep your personal data

We will store your personal data for as long as you have a relationship with us, or for as long as we are required to by law, or to comply with audit and financial obligations.

Your rights under the GDPR

You have a number of rights under the GDPR. These include the right to:

- request access to your personal data from us;
- request that we rectify your personal data;
- withdraw your consent for us to use your personal data;
- be forgotten by requesting that we delete the personal data that we hold for you;
- object to the use of your personal data by us and request that we restrict our use of your personal data;
- receive your personal data that we hold, in a commonly used electronic format, or to have us transfer such personal data to another service provider of your choosing;
- lodge a complaint in relation to our processing of your personal data with a data protection supervisory authority under the GDPR; and
- learn about and understand how we collect and use your personal data, including we may need to process your personal data in ways other than described in this Privacy Policy.

Changes to this Privacy Policy

This privacy policy may be revised from time to time. If there are any material changes, Wealth99 will notify you by email or by the posting of a notice on the website.

Contacting us about your information or this Privacy Policy

If you have any questions, complaints or requests in relation to this Privacy Policy or how Wealth99 handles your personal information, please contact us at hello@wealth99.com and state "Data Protection" in the subject line.