

# **Cornix – Privacy Policy**

**Last Updated:** July 10th, 2022

## **1. Introduction**

Cornix 10 LTD. (“**Company**” “**we**”, “**our**” or “**us**”), is committed to protecting the privacy of anyone who accesses, uses, or registers to our Services (defined below). We have published this Privacy Policy (“**Policy**”) to outline our practices with respect to collecting, using, and disclosing your information when you use our Services. We encourage you to read this Policy carefully and use it to make informed decisions.

Our Services may be connected by “hyperlinks” to other third-party’s sites. We are not responsible in any way for the privacy practices on other third-party’s sites and advise you to review the privacy policies on those linked sites before using them.

## **2. Our Services**

To get a better sense on how and from whom we collect data, it is useful to start with a brief overview of our Services. The Company is the owner of a proprietary software service that allows its end users to create and configure multifaceted trades for execution on third-party online cryptocurrency exchanges by creating their own trading models or following signals from various third party group leaders through channels which are integrated or created within Company's software service provided on its Platform (collectively, “**Services**”).

By using Company’s Services, you agree to the collection and use of your personal information as described in this policy as well as to Company's [Terms of Service](#). Any significant changes to this policy – will be posted on Company’s website <https://cornix.io/> (“**Website**”).

This Policy applies to the information we collect from any person using or interacting with our Services, as well as any person visiting our Website or our web interface (collectively, “**Users**”).

## **3. What Types of Data We Collect?**

We collect two types of data from you: Personal Data (“**Personal Data**”) and non-Personal Data. Personal Data means any information which may potentially allow your identification with reasonable means (for example, email address or name). Non-Personal Data, by contrast, can be defined as any information that does not relate to an identified or identifiable natural person. This may include, for example, your aggregated usage information and technical information transmitted by your device (for example, the

device you use, the type of browser and operating system your device uses, language preference, access time, etc.). This section sets out how and when we collect those types of data from you.

- 3.1. **Contact Information.** When you access our Services, we collect your username, first name, surname, country, Telegram ID and Discord account (including Discord ID and Discord username), as well as any contact information you make public using Telegram or Discord.
- 3.2. **Transaction Information.** Payments you make using our Services will typically be processed by the payment processor (e.g. PayPal, Coinpayments, etc.), and we will not collect or store your financial data (e.g. your credit card numbers or bank account details). We may still however receive your non-financial Personal Data related to your payment, such as your name, billing address, e-mail address and the items purchased, in order to fulfill your purchase and for our accounting purposes.
- 3.3. **Exchange Information.** When you continue with our onboarding process, you shall provide us with the details of your API keys and API secrets. Moreover, Company may collect from you additional details regarding your exchange and crypto investments, e.g. your portfolio size, cryptocurrencies allocation and availability.
- 3.4. **Usage Information.** When you use our Services, we collect certain data about your usage interaction with our Services. Such information may include geolocation data, clicks, pages viewed, channels membership, and other data which relates to your activity in the Services.
- 3.5. **Technical Information.** When you use our Services, we collect technical information about your device. Such information may include geolocation data, IP address, unique identifiers (e.g. MAC address and UUID), operating system, browsing history, language, mobile carrier, device information etc.
- 3.6. **Communication Information.** When you send us an email or contact us via the support in our Services, we collect the Personal Data you provide us. This may include your name, email address and any other information you choose to provide.

#### **4. Tracking Technologies**

When you visit or access our Services (for example when you visit our websites), we use (and authorize third parties to use) web beacons, cookies, pixels, scripts, tags and other technologies ("**Tracking Technologies**").

The Tracking Technologies allow us to automatically collect information about you and your online behavior, as well as your device (for example your computer or mobile device), for different purposes, such as in order to enhance your navigation on our Services, improve our Services' performance and customize your

experience on our Services. We also use this information to collect statistics about the usage of our Services, perform analytics, deliver content which is tailored to your interests and administer services to our Users, advertisers, publishers, customers and partners. We also allow third parties to collect information about you through Tracking Technologies.

When you use or access our Services, we use the following categories of Tracking Technologies:

- (a) Strictly Necessary Tracking Technologies (e.g., Cookies) – these Tracking Technologies are automatically placed on your computer or device when you access our Services or take certain actions on our Mobile Application or Website. These Tracking Technologies are essential to **enable** you to navigate around and use the features of our Services. We do not need to obtain your consent in order to use these Tracking Technologies;
- (b) Tracking and Advertising Tracking Technologies (e.g., Pixels) – these Tracking Technologies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. The Tracking Technologies remember the websites you visit and that information is shared with other parties such as advertisers or publishers. Publishers, advertisers, and third-party ad networks may also utilize Tracking Technologies or similar technologies to deliver ads and monitor the performance of such ads. The collection of information through Tracking Technologies by such third parties will be governed by their own privacy policies/cookies policies and principles, which the Company does not control;
- (c) Functionality Tracking Technologies – these Tracking Technologies allow our Services to remember choices you make and provide enhanced and personalized features. For example, these Tracking Technologies are used for authentication (to remember when you are logged-in) and support other features of our Services;
- (d) Performance Tracking Technologies – these Tracking Technologies collect information about your online activity (for example the duration of your visit on our Services), including behavioural data and content engagement metrics. These Tracking Technologies are used for analytics, research and to perform statistics (based on aggregated information).

#### **How and by whom Tracking Technologies are stored on your device?**

We store Tracking Technologies on your device when you visit or access our Services (for example, when you are visiting our Website) – these are called "First Party Tracking Technologies". In addition, Tracking

Technologies are stored by other third parties (for example, our analytics service providers, business partners, and advertisers), who run content on our Services – these are called "Third Party Tracking Technologies". Both types of Tracking Technologies may be stored either for the duration of your visit on our Services or for repeat visits.

There are various ways in which you can manage and control your Tracking Technologies settings. You can change your preferences using our cookie settings tool (however, please note that this tool may only be available in certain jurisdictions). Other methods of managing your Tracking Technology preferences includes: changing your browser settings to send a "Do-Not-Track" signal. In such case, your browser will send us a special signal to stop tracking your activity; However, please note that certain features of the Website or may not work properly or effectively if you delete or disable cookies.

To learn more about how can manage your cookies, below is a list of useful links that can provide you with more information on how to manage your cookies:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)

You can learn more and turn off certain third party targeting and advertising cookies by visiting the following third party webpages:

- [The Interactive Advertising Bureau \(US\)](#)
- [The Interactive Advertising Bureau \(EU\)](#)
- [European Interactive Digital Advertising Alliance \(EU\)](#)

You can withdraw your consent to personalized advertising experience on your device at any time by using your device settings as follows:

- On iOS, depending on the applicable iOS version, you may withdraw consent across all apps by either enabling the "Limit Ad Tracking" setting or disabling the "Allow Apps to Request to Track" permission in your iOS device settings. Depending on the applicable iOS version, instead of withdrawing consent on a device-wide basis, you may also have the option of withdrawing consent on a per-app basis by disabling tracking permissions for specific apps that appear under the "Allow Apps to Request to Track" setting in your iOS device settings (precise directions may differ depending on the applicable iOS version.)

- On Android devices, you may withdraw your consent in the Google Ads settings within your Android settings by enabling the “Opt out of Ads Personalization” setting (precise directions and the name of the setting may differ depending on the applicable Android versions and device manufacturer).

## 5. Why We Collect Your Personal Data

Privacy laws require us to have a valid lawful basis in order to process your Personal Data. The lawful basis for processing are set out in Article 6 of the 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 such data (“GDPR”). This section explains for what purposes we may use your personal data and outlines the legal bases that underlie our usage.

Purpose	Legal basis
<p><b>Consumer services.</b> We use your Personal Data, such as your name and email address, for consumer services purposes. This includes, for example, responding to your inquiries.</p>	<p>The legal basis for processing this data are the performance of our contractual towards you; your consent (for example, when you inputs personal information into the Website); the compliance with our legal obligations; and the protection of our legitimate interests. Our legitimate interests in this case are improving our Services.</p>
<p><b>Provide our Services.</b> We use your contact information (e.g. email, name, Telegram account to facilitate your registration with our Services.</p>	<p>The legal basis for processing this data are the performance of our contractual towards you and the protection of our legitimate interests. Our legitimate interests in this case are providing our Services.</p>
<p><b>Improve our Services.</b> We collect and analyze information about you and your usage of our Services to improve the usability and effectiveness of our Services. For example, we process details regarding your portfolio size and trades in order to present you with up-to-date data.</p>	<p>The legal basis for processing this data are the performance of our contractual towards you and the protection of our legitimate interests. Our legitimate interests in this case are improving our Services.</p>

<p><b>Marketing and Advertising.</b> We may use your Personal Data to provide you with personalized advertisements when visit our Services and to provide you with promotional materials we believe may be relevant for you. If you do not want us to use or share your Personal Data for advertising or marketing purposes, you may opt out of certain cookies by following the instructions provided in our Website.</p>	<p>The legal basis for processing this data are your consent (when required); the compliance with our legal obligations; and protecting our legitimate interests. Our legitimate interests in this case are providing you with tailored services and advertisements that better correspond with your interests.</p>
<p><b>Compliance with the applicable laws.</b> We may be required to collect, retain, or share your Personal Data under applicable laws.</p>	<p>The legal basis for processing this data is compliance with our legal obligation.</p>

## 6. Marketing

- 6.1. The Company may use your Personal Data independently or by using our third party subcontractors for the purpose of providing you with promotional materials, concerning the Services as well as products, services, websites and applications which relate to: (i) affiliated companies or Company's business partners and affiliates (collectively: "**Marketing Affiliates**"), which we believe may interest you.
- 6.2. We may also share and disclose Personal Data with our Marketing Affiliates for the purpose of providing you different marketing offers, which we, or our Marketing Affiliates, believe are relevant for you. Our Marketing Affiliates may use this Personal Data for different marketing techniques, such as, but not limited to, direct email, post and SMS.
- 6.3. You may at any time decline receiving marketing offers from us or from our business partners and marketing affiliates by contacting us at [support@cornix.io](mailto:support@cornix.io).
- 6.4. Please note that even if you unsubscribe from our marketing mailing list, we may continue to send you service-related updates and notifications.

## 7. With Whom We Share Your Data

We share your Personal Data as described below –

- Service providers: we share your information with service providers, such as analytics providers and advertisers, who help us provide you with our Services. These third parties may have access to your Personal Data so that they may perform these tasks on our behalf, but they are obligated to comply with this Privacy Policy and may not use your Personal Data for any other purpose.
- Advertising and marketing: we may share your information with our trusted partners to either provide you with tailored ads on our Services or on other third party websites or apps; or for the purpose of providing you with promotional materials we, or our trusted partner, believe may be of interest to you.
- Compliance with laws and law enforcement entities: we may disclose any data about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect our or a third party's property and rights, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable. We also may be required to disclose an individual's Personal Data in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.
- Merger and acquisitions: we may share your data if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your data in accordance with the terms of this Policy.

## 8. Data Protection Rights

This section addresses the specific rights applying to residents of the EU or residents in other jurisdictions that afford the below rights.

### 8.1. Your Rights

You may request to:

1. Receive confirmation as to whether or not Personal Data concerning you is being processed, and access your stored Personal Data, together with supplementary information.
2. Receive a copy of Personal Data you directly volunteer to us in a structured, commonly used and machine-readable format.
3. Request rectification of your Personal Data that is in our control.
4. Request erasure of your Personal Data.
5. Object to the processing of Personal Data by us.

6. Request to restrict processing of your Personal Data by us.
7. Lodge a complaint with a supervisory authority.

Please note that these rights are not absolute and may be subject to our own legitimate interests and regulatory requirements. Users outside the EU are welcome to contact us for any questions or requests at the details below.

## **8.2. Transfer of Data Outside the EU**

Any information that we collect (including your Personal Data) may be stored and processed in various jurisdictions around the world, for the purposes detailed in this Privacy Policy. However, we will only transfer your data-to-data recipients (i) located in the European Economic Area (the “**EEA**”), (ii) non-EEA countries which have been approved by the European Commission as providing adequate level of data protection, or (iii) countries entered into legal agreements ensuring an adequate level of data protection.

## **9. How We Protect Your Data**

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Data. While we seek to protect your information to ensure that it is kept confidential, we cannot guarantee the security of any information. You should be aware that there is always some risk involved in transmitting information over the internet and that there is also some risk that others could find a way to thwart our security systems. Therefore, we encourage you to exercise discretion regarding the Personal Data you choose to disclose.

## **10. Retention**

We will retain your personal information for as long as necessary to operate our Website or provide Services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods shall be determined taking into account the type of information that is collected and the purpose for which it is collected for, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

## **11. Minors**

We do not knowingly collect or solicit Personal Data from anyone under the age of consent (as determined under the applicable laws where the individual resides; “**Age of Consent**”). By accessing, using or interacting with our Services, you certify to us that you are not under the Age of Consent.



In the event that we learn that we have collected Personal Data from an individual under the Age of Consent without verification of parental consent, we will delete that information upon discovery. If you believe that we might have any information from or about an individual under the Age of Consent, then please contact us through the contact details available below.

## **12. Updates to this Policy**

We reserve the right to change this Policy at any time. The most current version will always be posted on our Website (as reflected in the “Last Updated” heading). You are advised to check for updates regularly. By continuing to access or use our Services after any revisions become effective, you agree to be bound by the updated Policy.

## **13. Further Information**

If you have any further questions regarding the data collected, or how we use it, please contact us via [support@cornix.io](mailto:support@cornix.io).