

Magnum Wallet Privacy Policy

Last Updated: 26.08.2019

1. Introduction

Magnum Wallet, company registered under the laws of Scotland and having its registered address at: 100 ("Magnum Wallet" or "we": and its derivatives) values the trust our users and customers (the "User" or "you") place in us when they give us access to their personal data. Please read this Privacy Policy (the "Policy") carefully to understand our practices regarding your information and how we will treat it.

By using our services and software on <https://app.magnumwallet.co> and by visiting our website <https://magnumwallet.co> you acknowledge that the collection, usage, and sharing of your information will take place as described in this Policy.

Policy details our collection, use and disclosure of personal and non-personal data you give to Magnum Wallet when you access or use Magnum Wallet web application and/or mobile application, and software provided by Magnum Wallet on or in connection with such services or websites (collectively, the "Site").

"Services" means the blockchain website with any feature provided by us via the website, including without limitation blockchain information services.

1.1 Personal Data and Non-Personal Data

Personal data (the "Personal Data") refers to any information that relates to an identified or identifiable individual, and non-personal data (the "Non-Personal Data") refers to any information that does not identify you as a specific individual. Please note that at all times Magnum Wallet will adhere to the applicable statutory definition in determining what is and is not Personal Data for the purposes of this Policy. Where this Policy refers to "information" or "your information" this may include both Personal and Non-Personal Data.

1.2 The Scope of the Policy

This Policy covers only data that we collect through the Site, and not any other data collection or processing, including, without limitation, the data collection practices of any affiliate or other third party, including any third-party operators of web pages to which the Site links, and any information that we collect offline or through any websites, products, or services that do not display a direct link to this Policy.

Occasionally, we may refer to this Policy in notices on the Site, including special purpose web pages or other resources, for example, if we invite you to submit ideas to improve the Site.

1.3 Changes to the Policy

Magnum Wallet may change its Policy from time to time. Please review the "Last Updated" legend at the top of this page to determine when this Policy was last amended. Any changes to this Policy will become effective on the "Last Updated" date indicated above. By using the Site and Services, you accept the amended Policy.

1.4. Fundamental Principles of Policy

Your privacy is critically important to us. At Magnum Wallet, we have a few fundamental principles:

- We are thoughtful about the personal information we ask you to provide and the personal information that we collect about you through the operation of our Services and Site.

- We store personal information for only as long as we have a reason or legal basis to keep it.
- We aim for full transparency on how we gather, use, and share your personal information.
- We do not monetize your data.
- We collect any data only on lawful grounds.

1.5 The Blockchain

Due to the inherent transparency of many blockchains, transactions that individuals broadcast via Magnum Wallet may be publicly accessible. This includes, but is not limited to, your public sending address, the public address of the receiver, the amount of sent or received funds, and any other data a user has chosen to include in a given transaction. Information stored on a blockchain may be public, immutable, and difficult or even impossible to remove or delete. Transactions and addresses may reveal information about the user's identity and information can potentially be correlated now or in the future by any party who chooses to do so, including law enforcement. Users are encouraged to review how privacy and transparency on the blockchain works.

2. Information Collected

Magnum Wallet is a free, open-source, client-side tool for interacting with the blockchain. Magnum Wallet values privacy and we make a concerted effort to minimize and, to the extent possible, eliminate the exposure of personal data during the use of our Site and Services by the User.

Magnum Wallet does not collect, hold, or store blockchain related information, such as User private keys, account information, or passwords.

We do not collect or process any payment data and also sensitive data, that is also prohibited by Art. 9 GDPR, unless it is required by applicable law of jurisdiction, for example, in the event of court order. Under most circumstances, the types of data listed below will not be processed:

- ✓ race or ethnic origin;
- ✓ political opinions;
- ✓ religious or philosophical beliefs;
- ✓ trade union memberships;
- ✓ genetic or biometric data;
- ✓ health or mortality;
- ✓ sex life or sexual orientation.

We do not collect data passively for using your data for targeting marketing or targeting advertising.

We use cookies to improve the Site and Services usage. We use cookies to collect Site statistics using Google Analytics, please see [Cookies Policy](#) for the details.

We may collect Personal Data you choose to provide to us. When you subscribe to newsletter, you give us your e-mail address. It will not be associated with Magnum Wallet account. It will be used only for bulk newsletters with no User identifications.

Magnum Wallet does not track Users over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.

2.1 Any Other Personal Data Magnum Wallet May Receive from Third Parties

Any Personal Data that Magnum Wallet may obtain from other third-party sources will be processed by Magnum Wallet in accordance with this Policy and all applicable laws.

2.2 Storage of Your Information

Magnum Wallet shall retain users' Personal Data to the extent such retention is adequate, relevant and limited to what is necessary for the purposes for which they are processed. In particular, Magnum Wallet shall not retain Personal Data for any longer than necessary for the purposes of performing the processing outlined in this Policy and Magnum Wallet is not legally required to continue to keep it.

If you create a Magnum Wallet account, your information may be collected and stored in your local browser cache. The collection of this data is solely used in accordance with the purposes outlined in sections 4, 5 and 9 of this Policy, to the extent applicable.

Magnum Wallet may also store the information detailed in this section 2 of the Policy on its equipment or the equipment of third parties that Magnum Wallet has a relationship with. Such storage services will be governed by appropriate protections, as required by applicable rules.

2.3 What Personal Data is Required

Magnum Wallet will indicate to you at the point of the provision as to whether or not particular Personal Data provided by you is required in order to provide particular Magnum Wallet Services or features to you.

2.4 The Legal Basis on Which Magnum Wallet Collects Your Personal Data

Magnum Wallet collects and processes your Personal Data on the basis of different legal grounds, depending on the nature of the Personal Data is provided and the type of processing involved.

For more understanding of how we collect your personal data we placed the conform information in table below:

Information collected	Purpose of collection of data	Legal basis for processing of data
Data you voluntary provide to us, such as keys from cryptocurrency exchanges	<ul style="list-style-type: none">• To provide our Services;• To resolve your claims.	Performance of the contract
Your e-mail	<ul style="list-style-type: none">• To provide our Services;• To communicate with you;• To resolve claims.	Performance of the contract
	<ul style="list-style-type: none">• Technical and statistical purposes.	Legitimate interest
Data we receive automatically, such as: <ul style="list-style-type: none">• log information:<ul style="list-style-type: none">✓ IP-address;✓ information about operational	<ul style="list-style-type: none">• To provide our Services;• To resolve claims.	Performance of the contract

<p>system; ✓ information about Internet browser; • information from cookies.</p>	<ul style="list-style-type: none"> • To further develop and improve our Services, for example by adding new features that we think our Users will enjoy or will help them; • To monitor and analyze trends and better understand how Users interact with our Services, which helps us improve our Services and make them easier to use; • Technical and statistical purposes. 	<p>Legitimate interest</p>
<p>Statistical data not identifying you exactly (without information about your exact location).</p>	<ul style="list-style-type: none"> • To further develop and improve our Services, for example by adding new features that we think our users will enjoy or will help them; • To monitor and analyze trends and better understand how users interact with our Services, which helps us improve our Services and make them easier to use; • Technical and statistical purposes. 	<p>Legitimate interest</p>
<p>Information you provide to our support team.</p>	<ul style="list-style-type: none"> • To monitor and prevent any problems with our Services, protect the security of our Services, detect and prevent fraudulent transactions and other illegal activities, fight spam; • To communicate with you, solicit your feedback, or keep you up to date on Magnum Wallet and our products; • To verify your identity and to fulfil your support request, to provide you support, including to help identify and troubleshoot problems, to survey your opinions through surveys or questionnaires; • To investigate any complaints and to provide you with a more efficient Services. 	<p>Performance of the contract Legitimate interest</p>

3. Limitation of Use or Disclosure of Personal Data

3.1 Sharing Information

We don't sell our Users' Personal Data.

Information about Users can be disclosed by Magnum Wallet or other third-party provider upon the request from a court of law or regulatory related institutes under applicable law.

We may disclose information about you to our subsidiaries, our employees, and individuals who are our independent contractors that need to know the information in order to help us provide our Services. We require our subsidiaries, employees, and independent contractors to follow this Policy for Personal Data that we share with them.

We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of Magnum Wallet, third parties, or the public at large.

We may share and disclose information with your consent or at your direction (for example, we may share your information with third parties with which you authorize us to do so).

For more understanding of who can receive your personal data we placed the conform information in table below:

Information Collected	Source of personal data	Recipients of personal data	Legal Basis for processing of Data
Data you voluntary provide to us, such as keys from cryptocurrency exchanges	From you directly	None	Performance of the contract
Your e-mail	From cryptocurrency exchanges	Amazon Web Services Google Analytics Google Adwords Matomo	Performance of the contract Legitimate interest

<p>Data we receive automatically, such as:</p> <ul style="list-style-type: none"> • log information: <ul style="list-style-type: none"> ✓ IP-address; ✓ information about operational system; ✓ information about Internet browser; • information from cookies. 	<p>Directly from your device</p>	<p>Amazon Web Services Google Analytics Google Adwords Matomo</p>	<p>Performance of the contract Legitimate interest</p>
<p>Statistical data not identifying you exactly, (without information about your exact location).</p>	<p>From statistic and analytical networks and systems.</p>	<p>None</p>	<p>Legitimate interest</p>
<p>Information you provide to our support team.</p>	<p>Directly from you</p>	<p>None</p>	<p>Performance of the contract Legitimate interest</p>

3.2 Analytics Services Provided by Others

Other parties may provide analytics services via our Services. These analytics providers may set tracking technologies (like cookies) to collect information about your use of our Services and across other websites and online services. These technologies allow these third parties to recognize your device to compile information about you or others who use your device. This information allows us and other companies to, among other things, analyze and track usage, determine the popularity of certain content and services. Please note this Policy only covers the collection of information by Magnum Wallet and does not cover the collection of information by any third party analytics providers.

3.3 Third Parties

Please note that Magnum Wallet uses some 3-rd party software and services. We don't own or control these third parties and they have their own rules about collection, use and sharing of information, which you should review.

- Google Analytics, Google Play and Google Adwords: <https://policies.google.com/privacy?hl=en&gl=ZZ>;
- Matomo: <https://matomo.org/privacy-policy/>;
- Amazon Web Services: <https://aws.amazon.com/ru/privacy/>.

3.4 Minimum Age of our Users

The Site and Services are not for use by anyone under the age of 18. Using our Site and Services you certify you are 18 years of age or older.

If you are under the age of 18 or the age of majority in your jurisdiction, you must use Magnum Wallet's Site and Services under the supervision of your parent, legal guardian or

responsible adult. Magnum Wallet adopts (but it is not the obligation of the Magnum Wallet) a range of measures to try to ensure that we do not accept individuals who do not meet the minimum age and any other applicable age requirements. If you do not satisfy these age requirements, please email dpo@magnumwallet.co.

4. Security

Magnum Wallet seeks to use reasonable security measures to help protect against the loss, misuse and alteration of the Personal Data under Magnum Wallet's control. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. In addition, please note that e-mails are not encrypted. Therefore, while we strive to protect your information, we cannot guarantee its security.

Please also be aware that we may use third-party cloud service providers that provide hosting, data storage and other services pursuant to standard terms and conditions that may be nonnegotiable; these service providers have informed us or the general public that they apply security measures they consider adequate for the protection of information within their system, or they have a general reputation for applying such measures. However, we will not be liable (to the fullest extent permitted by law) for any damages that may result from the misuse of any information, including Personal Data, by these companies.

5. Cookies

"Cookies" are small pieces of information that are stored by your browser on your computer's hard drive. Please see our [Cookie Policy](#) for further information regarding Magnum Wallet's use of Cookies.

6. Links to Third-Party Sites

The Site may contain links to other websites or third-party resources. When you click on such links, you may leave our Site.

7. Acquisitions and Other Reorganizations

Information collected pursuant to this Policy, including Personal Data, may be disclosed to one or more third parties in connection with any change of ownership or control in Magnum Wallet's business (whether by merger, sale, or otherwise), or any other reorganization or joint venture, or assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceeding), and any such information may be used by such third party in accordance with this Policy. Equally, information collected pursuant to this Policy, including Personal Data, may be disclosed to one or more third parties in connection with any acquisition or merger carried out by Magnum Wallet or such third parties.

8. Exercising Rights With Respect to Personal Data

Magnum Wallet Users that provide their Personal Data in the EU, and those who provide their Personal Data in any other jurisdictions that adopt laws affording equivalent protections to those in the EU, may avail of the rights detailed below.

8.1 The Right to Rectify Your Personal Data

Magnum Wallet Users are able to edit and update most of their Personal Data held by Magnum Wallet on the Site, and if you have any queries or complaints we encourage you

may make a formal request to have Magnum Wallet rectify any inaccurate Personal Data on your behalf by sending an email to dpo@magnumwallet.co.

8.2 The Right to Object to or Restrict the Processing of Your Personal Data

If you have any queries or complaints about how we process your Personal Data we encourage you may make a formal request to object or restrict, processing of your Personal Data by Magnum Wallet. In order to do so please send an email to dpo@magnumwallet.co.

8.3 The Rights of Access to Your Personal Data

Magnum Wallet Users are able to access most of their Personal Data held by Magnum Wallet on the Site, and if you have any queries or complaints we encourage you may make a formal request to access your Personal Data held by Magnum Wallet. In order to do so, please send an email to dpo@magnumwallet.co.

8.4 The Right to Delete Your Personal Data

Magnum Wallet Users are able to edit and update most of their Personal Data held by Magnum Wallet on the Site, and if you have any queries or complaints we encourage you may make a formal request delete your Personal Data held by Magnum Wallet. In order to do so, please email to dpo@magnumwallet.co and paste the following sentence in your e-mail: "I am requesting to delete my personal data." Once your request has been confirmed, Magnum Wallet will initiate the necessary steps to execute this exercise.

8.5. Right to Data Portability (in certain specific circumstances)

If you wish, you can ask us to download (export) all Personal Data that we have in the format acceptable to give it to someone else or ask us to give them your data directly.

8.6. Right Not to Be Subject to an Automated Decision

If we process your Personal Data automatically and we take some decisions according to it, and it affects you in any serious way, you can express your point of view and contest such decision.

8.7. Right to Lodge a Complaint With a Supervisory Authority

You always can complain about us and about the way, we are processing your personal data.

9. Do Not Track Requests

We do not respond to the browser "Do Not Track" (DNT) signal if the User enables it in their web browser. When we set or read cookies on non-Magnum Wallet sites that have integrated our job search and display features, we do so. We do not share any information about your usage of Magnum Wallet with those third parties. When third parties that we have integrated into Magnum Wallet sites (as described in the Magnum Wallet Cookie Policy) set or read their third-party cookies, they may or may not respond to the DNT signal.

10. Transferring Information

Because our Services are offered worldwide, the information about you that we process when you use the Services in the EU may be used, stored and/or accessed by individuals operating outside the European Economic Area (EEA) who work for us, other members of our group of companies, or third party data processors. When providing information about you to entities outside the EEA, we will take appropriate measures to ensure that the

recipient understands the necessity to process your personal data only on legal basis and protects your personal information adequately in accordance with this Policy as required by applicable law. These measures include:

- In the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield; or
- In the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.

11. General Inquiries and Complaints

11.1 Contacting Magnum Wallet

You may contact Magnum Wallet: "". If you would like to contact Magnum Wallet's Data Protection Officer, please send an email to dpo@magnumwallet.co.

11.2 Complaints

If you believe your data protection rights have been infringed by Magnum Wallet, you have the right to complain to dpo@magnumwallet.co.