

## Bookmap OÜ Privacy Policy

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### General

This privacy policy governs the manner in which **Bookmap Ecosystem** platform (“we”) collects, uses, processes, stores and discloses information received from users of **Bookmap Ecosystem** web-site <https://ico.bookmap.eu/> (“website”) in order to provide you with services available through the website (“services”).

This privacy policy is designed to assist you in understanding how we collect and use the personal information you provide to us and to assist you in making informed decisions when using our site and our products and services.

We respect the privacy of all users of our website and ensure that personal data of the consumers is treated confidentially and in compliance with applicable laws and regulations.

By accessing the website or using our services, you signify your acceptance to the terms of this privacy policy. Where we require your consent to process your personal data, we will ask for your consent to the collection, use, and disclosure of your personal data as described further below. We may provide additional disclosures or additional information about the data collection, use and sharing practices of specific services, from time to time. Such notices may supplement or clarify our privacy practices or may provide you with additional choices about how we process your data.

### Information collection and use

Personal data is data that can be used to identify you directly or indirectly, or to contact you. We collect several different types of information for various purposes to provide and improve our service to you. The privacy policy covers all personal data that you voluntarily submit to us and that we obtain from third parties. This privacy policy does not apply to anonymized data, as it cannot be used to identify you.

We may collect the following types of personal data (as applicable), without limitation:

- **Personal Identification Data:** full name, date of birth, age, nationality, gender, signature, utility bills, photographs, phone number, home address, and/or email.
- **Formal Identification Data:** tax ID number, passport number, driver’s license details, national identity card details, photograph identification cards.
- **Financial Data:** transaction history, trading data, and/or tax identification.
- **Online Identifiers:** geo location/tracking details, browser name

and version, and/or personal IP addresses.

- **Transaction Data:** Information about the transactions you make on our services.
- **Usage Data:** survey responses, information provided to our support team, authentication data, user ID, click-stream data and other data collected via cookies and similar technologies.
- **Data of your vehicle:** car mileage, VIN code, register number, insurance cases; accidents; service maintenance;;

Much of the information listed above is collected directly from you when you submit it on the website. This includes information such as contact details, registration information and service inquiries. If you do not want to share your information, you can choose not to participate in a particular type of service or activity. The amount of information collected from you in relation to the operation of the website and provision of the services may differ depending on whether you access the website and the services logged in to your user account or without logging in.

It is an important to us that your personal data is up to date. We will take reasonable steps to make sure that your personal data is accurate, complete and up-to-date. If you find that the personal data we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

### **How do we use your information?**

Generally, we collect, use or disclose your personal data for one or more of the following purposes:

- provide you with products and/or services that you request for;
- managing your relationship with us;
- facilitating your use of our applications;
- to resolve any disputes, investigating any complaint, claim or dispute or any actual or suspected illegal or unlawful conduct;
- assisting you with your enquiries, and to respond to your feedback, complaints and requests;
- to notify you of our products, services, programs and events;
- to process your job application and assess your suitability for the position applied for;
- any other reasonable purposes related to the aforesaid.

We may also use your personal data for purposes connected or relevant to our business, such as:

- complying with our legal obligations and requirements;
- complying with international sanctions and applicable regulation for securities and to counter money-laundering or financing of terrorism;
- enforcing obligations owed to us, and contractual terms and conditions;
- carrying out market expansion plans, research, data analysis, testing, research, statistical and survey purposes;
- staff training;

- any other reasonable purposes related to the aforesaid.

### **Information we share**

We use third parties to provide services to us, such as:

- managing mailing lists and delivering email;
- hosting our websites;
- helping us analyze the use of these services;
- these companies process personal data on our behalf. We only provide these companies with the information needed to deliver the service.

We may preserve, use, or disclose your personal data if we believe it is reasonably necessary to:

- comply with a law, regulation, legal process, or governmental request;
- protect the safety of any person;
- protect the integrity of our platform, including to help prevent spam or abuse;
- address fraud, security, or technical issues;
- protect our rights or property or the rights or property of those who use our services.

### **How do we protect your personal data?**

We will take reasonable precautions to safeguard your personal data. While reasonable precautions will be taken to ensure that the information you provide is protected against unauthorised or unintended access, we cannot be held responsible for unauthorised or unintended access that is beyond our control, such as hacking or cybercrimes.

### **How long do we retain your personal data for?**

We will keep your personal data for so long as we need the personal data for our business and legal purposes.

### **Children's personal data**

We do not knowingly request to collect personal data from any person under the age of 18. If a user submitting personal data is suspected of being younger than 18 years of age, we will require the user to close his or her account and will not allow the user to continue using the services. We will also take steps to delete the personal data as soon as possible.

### **Cookies and similar technologies**

We may also use technologies like cookies and other similar technologies. Cookies are small files that can be automatically downloaded to your devices and designated to help websites recognize a user that has visited the website previously such as simplifying the logging in for registered users. Most web browsers automatically accept cookies. You may disable cookies on your computer if you do not want your computer to accept them.

Like most standard website servers, we use log files. Log files track Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks. We utilize this information to analyze trends, administer the website, prevent fraud, track website navigation in the aggregate, and gather broad demographic information for aggregate use.

As part of providing personalized services, we use cookies to:

- provide you with personalized content based on your use of the website;
- enable you to more easily use the website by remembering and using contact information, purchasing information, and registration information;
- evaluate, monitor and analyze the use of the website and their traffic patterns to help improve the website and the services;
- assist us with advertisement reporting functions such as to learn which ads are bringing users to the website;
- help us to display advertisements that will be relevant to you.

### **Provisions relating to GDPR**

This provisions govern handling of personal data pursuant to General Data Protection Regulation (EU) 2016/679 of 27.04.2016 or any equivalent applicable legislation (collectively, “GDPR”). In particular, GDPR applies to you if you reside in the European Economic Area or Switzerland.

You have rights to transparent information, communication and modalities for the exercise of your rights as the data subject under GDPR. Your principal rights under GDPR are:

- the right to be informed;
- the right to restrict processing;
- the right to access;
- the right to rectification;
- the right to object to processing;
- the right to erasure;
- the right to data portability;
- the right to complain to a supervisory authority;
- the right to withdraw consent.

You have the right to be informed about the collection and use of personal data. Information must be concise, transparent, intelligible, easily accessible, and written in clear and plain language.

You have “the right to be forgotten”, to the erasure of your personal data without undue delay. It applies in following circumstances:

- personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw consent to consent-based processing;
- you object to the processing under certain rules of applicable data protection law;
- the processing is for direct marketing purposes;
- personal data have been unlawfully processed.

In the case of a personal data breach, we shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify you of such breach. If a breach is likely to result in a high risk to the rights and freedoms of individuals, we must inform you directly and without undue delay.

### **KYC and AML requirements**

Our company obtained two licenses to provide:

- services of exchanging a virtual currency against a fiat currency and
- a virtual currency wallet service.

Licensing is regulated by the Money Laundering and Terrorist Financing Prevention Act of Estonia (MLTFPA). The supervisory authority is Estonian Police and Border Guard Board, Financial Intelligence Unit (FIU).

An important part of the licensing procedure and a significant FIU consideration for granting licenses is the quality of the rules of procedures (the “Rules of Procedures”) which according to the MLTFPA, should be carefully drafted by the license applicant. Our Rules of Procedures comply with the Estonian law’s various requirements, which require them, among other things, to include specification of customer due diligence measures the company intends to take, assessment of money laundering risk, the manner of the collection and keeping of records, internal control rules, etc.

### **Contacting us**

If you have any questions about this privacy policy, please contact us by sending e-mail to [ico@bookmap.eu](mailto:ico@bookmap.eu). Please note that information you submit through e-mail may not be secure, so please do not include sensitive information in your messages to us.