

ORKENDEU LTD

PRIVACY POLICY

Introduction

This document outlines Privacy Policy (hereinafter – “Privacy Policy,” or “Policy”) of ORKENDUE LTD, a company incorporated under the Laws of the Autonomous Island of Mwali (Moheli) Comoros Union and Registered address at Misa Building, B.P. 724, Fomboni, Island of Moheli, Comoros Union (hereinafter “Operator” or “Controller”).

This Privacy Policy is intended to inform all users of the Website and clients of the Policy for working with personal data that Controller follows in relation to client information and client accounts (hereinafter referred to as “Personal Data”).

Unless otherwise provided in this document, when (i) “We” is used in the text of these Policy, it means Controller and/or the Operator. (ii) “You” in the text of these Policy, it means the User, Client and/or other person who has provided personal data to the Operator.

DEFINITIONS

Controller	The Operator as a body that defines the goals and terms of Personal Data processing on its own or in liaison with other bodies.
Personal Data	Any information related to a “data subject”, which means an identified or identifiable natural person. an identifiable natural person is a person who can be identified directly or indirectly, among other means, by cross-referencing an identifier, such as name, identification number, location data, online identifiers, or by cross-referencing one or more factors, specific for physical, physiological, genetic, intellectual, economic, cultural or social identity of this natural person.
Processor	A natural person or legal entity, government institution, agency or any other body that processes Personal Data on behalf and by request of the Controller.
Processing	Any action (operation) or cumulative actions (operations) conducted to Personal Data with the use of automated means or without them, including collection, recording, management, structuring, accumulation, storage, adaptation and alteration, import, viewing, use, disclosure by transmission, distribution or any other type of access, comparison, combination, reduction, deletion or destruction.

1. GENERAL PROVISIONS

1.1. This Privacy Policy defines the procedure and conditions for the legality of the Controller 's processing of personal data, the list of personal data that may be processed, the categories of recipients of your personal data, your rights and obligations, as well as other important information related to the processing of your personal data.

1.2. This Policy shall be interpreted and construed in accordance with the applicable law.

1.3. For all matters related to the interpretation, execution, enforcement of the rights provided under this Policy, as well as for the purpose of submitting inquiries and requests, you may contact the Data Protection Officer by sending an email to our Data Protection Officer

2. LAWFULNESS OF PROCESSING

We act as the Controller of your Personal Data and, alone or jointly with others, determine the main purpose and legal basis for collecting and processing your Personal Data.

The Controller has defined the following purposes and legal basis:

- **Consent.** Your consent is only requested in certain circumstances, which include, for example, the processing of: (i) facial recognition data as part of the age and identity verification process. and (ii) age determination. and (iii) when initiating an interaction to be able to accede to service terms. and (iv) direct marketing (so that we can keep you fully informed about the products and services we supply and which we believe may be of interest to you).
- **Performance of a contract.** The collection and processing of your Personal Data is necessary to establish a business relationship with you to provide the Services in accordance with the service terms, i.e. the performance of our contract with you.
- **Regulatory compliance.** As a global business, we may process personal data in accordance with applicable laws, rules and regulations in the locations where we operate. The Controller 's responsibilities and legal obligations for the processing of personal data are governed by the Laws of the Autonomous Island of Mwali (Moheli) Comoros Union and other provisions of law that apply to the activities we carry out.
- **Legitimate interests** pursued by the Controller in order to protect its business environment, provided that such interests do not override your rights, interests and fundamental freedoms. "Legitimate interests" covers a number of different reasons why the Controller may need to collect and process your Personal Data that may not be covered by other grounds, such as: preventing fraud or financial crime, providing a better service, transferring Personal Data between group entities for internal administrative purposes or for network or information security purposes. This includes, for example, investigating and responding to a report made under our DMCA takedown procedure.

3. TYPES OF PERSONAL DATA THAT WE COLLECT

We process and/or our third-party suppliers (Processors) process on our behalf various types of personal data about customers and users, which we have grouped as follows:

TYPES OF PERSONAL DATA	Details
User Data	<ul style="list-style-type: none"> • name. • age. • residential address. • country of residence. • email address. • Logins in messengers (WhatsApp, Telegram, Skype, Discord, Slack, etc.) • telephone number (if applicable). • identity document that you provide to us. • photo ("selfie"), including with your identity document (if applicable).
Account Data	<ul style="list-style-type: none"> • profile name. • password. • your account avatars and headers. • your subscriptions. • followers and referrals. posts you have made on your account. chat messages between you and other users. support requests you send to us. • marketing preferences: unsubscribe information (if you have unsubscribed from our mailing list).

	Contact customer service via email and other data stored by our customer service.
Financial Data	<ul style="list-style-type: none"> ● details of incoming and outgoing transactions. ● statistics on the time of trading operations. ● volume of trading operations. ● individual financial instruments and transaction directions. ● payment card details. ● bank account details. ● information on our wealth. ● information on your sources of income. ● requests and transactions concerning the withdrawal of assets. ● payments made from your Account. ● any unsuccessful payments. ● information on currency exchange transactions that you carry out on the Website, including transaction amounts, types of exchanges carried out and other information on your transactions. ● Crypto wallets account / addresses
Technical Data	<ul style="list-style-type: none"> ● Internet or other electronic network activity information, including Internet Protocol (IP) address (and associated location data). ● Internet Service Provider (ISP) device ● the type of browser you use, access times, pages viewed, your IP address, and the page from which you came to the Website. ● device identifier (client identifier for the Internet), device type, screen resolution. ● browsing data (what actions the user performed on the Website) - Country. ● information about the computer or mobile device you use to access our services, including the hardware model, operating system version, unique device identifiers and mobile network information.
Facial Recognition Data	Image of a face during the Verification procedure.

4. HOW WE COLLECT YOUR PERSONAL DATA

We collect your Personal Data from the following sources:

- Directly from you: when you provide it to us directly during Account creation and/or when using the Services, when you update your personal data in your Account or message us (for example, User Data, Account Data, etc.).
- Automatically or indirectly from you: for example, as a result of you using the Services (i.e., Payment Data, Technical Data, Usage Data).
- From our service providers. for example, if it is allowed by applicable law, we receive third-party registration data and particular technical data from our age and identity verification contractors.
- We also log IP-addresses and browser type from devices that you use.

5. HOW WE USE YOUR PERSONAL DATA

We strive to ensure that the Content is accessible to everyone and that it remains relevant and lawful. To do this, we collect and process your personal data for the following business and commercial purposes:

- a) Opening an Account.
- b) Confirming age and identity, where applicable, and subsequent verification (in particular with regard to the processing of facial recognition data).
- c) Checking the validity of an identity document and maintaining records of the age and identity verification process.
- d) Providing the services you request, processing transactions and sending you relevant information.
- e) Providing technical support.
- f) Combining your information with information we receive from other sources to better understand and meet your needs.
- g) Sending you technical notices, updates, security alerts, administrative messages and support messages.
- h) The email address you have provided to us may be used to send you information and updates related to your use of the services. We may also occasionally inform you of company news, latest news and offers regarding products and services.
- i) Send you offers and other promotional information.
- j) Keep you informed about new features and new products, including changes and improvements to the Website.
- k) Respond to your comments, questions, and requests in order to provide you with service.
- l) Billing and collection.
- m) Resolve disputes and problems.
- n) Monitor and analyze trends, usage, and activity regarding our services.
- o) Enforce and enforce our terms of service and other policies.
- p) Maintain a record of blocked Users to prevent further access to the Website.
- q) Report illegal activity to appropriate law enforcement authorities, other government agencies, and non-governmental organizations.
- r) Retain and share personal data in the context of legal proceedings.
- s) Comply with applicable laws, rules, and regulations.
- t) Monitoring the company's transactions and network, systems, applications and data to: (i) detect malicious, deceptive, fraudulent or illegal activity to protect information security and integrity, as well as the safety of users. and (ii) respond to/investigate incidents where appropriate.
- u) Where necessary or appropriate to protect the rights and property of our users, us and other third parties.
- v) Data analysis and testing, system maintenance, reporting and data hosting to maintain, develop and improve the provision of the Services (e.g. security, performance and functionality).
- w) Where necessary in the context of a possible sale, merger, acquisition, business reorganization or restructuring of the Controller.
- x) Processing personal data in connection with sponsorship and our relationships with service providers, professional advisers and other third parties for business purposes (e.g. business contact information and correspondence).

6. CATEGORIES OF PERSONAL DATA RECEIVERS

We share personal data with the following third parties.

- **Our contractors:** for example, IT services providers, payment aggregators and systems, payment and financial institutions, services that provide User Support and Content moderation, and also age and identity verification service providers.

- **Our professional advisors and employees:** for example, our developers, moderators, operators, legal advisors, bankers, auditors, accountants, advisors and insurance providers. Our professional advisor will process your personal data if needed to provide us with their services.
- **Our group of companies:** for centralized coordination and management of our business. These receivers will process your personal data pursuant to this document.
- **Corporate persons:** Third parties related to possible selling, merging, restructuring of business or restructuring of the group.
- **Government institutions, regulatory bodies and institutions:** These receivers will use your personal data when conducting their regulatory, legal and other charitable or non-commercial activities.

7. YOUR RIGHTS REGARDING PERSONAL DATA

You have particular rights regarding gathering and processing of personal data. You can exercise those rights by contacting us and following given instructions.

Your rights may differ depending on applicable laws, but may include:

- The right to receive information related to our gathering and processing of your personal data, including, but not limited to, legal grounds for gathering and processing, data categories, designated use of data, estimated data retention period. This document contains all the necessary information, but you can always contact us for more information and ask any questions.
- The right to access your personal data that we gather, that makes you, as the subject of that data, eligible to receive copies of your personal data that we process for you. In fact, it means that we must respond within 1 (one) month since receiving a Request.
- The right to edit your personal data if some information is incorrect or incomplete.
- The right to get your data deleted (the “right to erasure”). You can request us to delete or in any other way dispose of any of your personal data that we process. Notice that this is not an absolute right, and we might not be able to fulfill your request, as we might be legally bound and/or we might have the right to keep storing your data within a particular period of time, including, but not limited to, pursuant to the Terms of Service.
- The right to restrict personal data processing.
- The right to object to processing of personal data carried out in connection with particular task or tasks. Notice that the right to object is applicable only in particular situations and depends on the tasks or legal grounds for processing.
- The right to data portability. This is applicable only in cases when you've directly provided us with your data. Your consent with and compliance to the agreement provide legal grounds for data processing. We process your data using automatic means. In such cases you have your right to get your personal data (or request us to pass it along to another Controller) in a structured, commonly used and machine-readable format.

8. PERSONAL DATA PROTECTION

When you provide us with your personal data via the Website and/or via other means, this information is transmitted via the Internet in a secure manner, using standard encryption. Your personal data will be stored in encrypted form on secure servers.

9. STORAGE OF PERSONAL DATA

9.1 We will retain your personal data only for as long as reasonably necessary to fulfil the purposes for which it was collected, as set out in this Policy. Unless otherwise provided in the Policy, we will retain personal data for 5 (five) years after deletion of your Account on the Website.

9.2 We will delete your personal data sooner if applicable law requires a shorter retention period.

9.3 We will retain your personal data for a longer period (up to 7 years) if we deem it necessary to carry out the processing activities set out in this Policy, such as:

- where necessary to comply with laws and regulatory obligations that apply to us (e.g. compliance with counterterrorism and crime financing requirements, record-keeping/record-keeping requirements in certain locations and financial/tax reporting requirements, if we receive a valid legal request, such as a preservation order or search warrant related to your account).
- to detect and report illegal activity, protect the safety of our users and third parties, or otherwise protect the rights and property of our users, us and other third parties (for example, if you have, or we have reason to believe, that you have violated our Terms of Service and in circumstances where users are prohibited from further access to the Website).
- for legal proceedings (for example, defending a claim involving you).
- to respond to third party requests regarding your account, such as requests from or investigations by law enforcement, relevant government authorities (such as tax authorities and regulators) and non-governmental organizations.

The personal data we retain and the length of time we retain it will be determined on a case-by-case basis depending on the specific circumstances.

10. DATA BREACH

In case of the Operator notices a Personal Data breach that might result in a high risk to Your rights or freedoms, the Operator will notify You of such breach by sending a relevant message to an available contact address without unreasonable delay (for example, a direct message to User Account), and provide the following information:

- The type of compromised Personal Data.
- The nature of the breach.
- The steps that the Operator should take to minimize any damage.

You must immediately notify the Operator, by sending an email, of any possible damages, losses or unauthorized use that might be caused to You by such breach, to help the Company assess all possible solutions.

11. OTHER IMPORTANT INFORMATION ABOUT PERSONAL DATA AND SERVICES

11.1. Third Party Websites and Services. When you access these third-party services, you leave our Website, and we are not responsible for and have no control over the content, security or privacy practices employed by any third party Websites and services. As a convenience, we may link or provide links to third party Website and services, including Websites and services of unaffiliated third parties, our affiliates, service providers and third parties with whom we do business (including, without limitation, our service providers). You access these third-party services at your own risk. This Privacy Policy does not apply to any third-party services. please refer to the policies of such third party services for information about how they collect, use and process personal data.

11.2. Business Transfers We may, in the future, sell or otherwise transfer some or all of our business, operations or assets to a third party, whether by merger, acquisition or otherwise. Personal information that we collect from or about you through the Services may be disclosed to any potential or actual third-party acquirers and may be among those transferred assets.

11.3. International Use. Your personal information will be stored and/or processed in Saint Vincent and the Grenadines and other countries. By using the Website, you acknowledge that we will transfer and store your personal information in the above countries, which may have different data protection rules than your country and the personal information may be accessible as required by law (including to law enforcement and/or national security authorities in those countries).

11.4. We do not knowingly collect information, including personal information, from minors or other individuals who are legally unable to use our Service. If we learn that we have collected data from a minor, we will delete it immediately unless we are required to retain the data by law. Please contact us if you believe that we have mistakenly or unintentionally collected information from a minor. The age of majority is determined by law. The age of majority may vary depending on your jurisdiction.

12. COOKIES

12.1. Cookies enable us to identify your device, or you when you have logged in. We use cookies that are strictly necessary to enable you to move around the Websites or to provide certain basic features. We use cookies to enhance the functionality of the Website by storing your preferences, for example. We also use cookies to help us to improve the performance of our Website to provide you with a better user experience.

12.2. Mostly we use cookies to deliver the following services throughout the pages of our Website:

To enable us to recognize your device so you don't have to give the same information repeatedly.

To ensure that your experience is smooth and secure.

To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

13. FINAL PROVISIONS

13.1. If you become aware of any violations of this document and/or the Policy, you are obliged to immediately notify the Operator using its contact details. Any delay, failure to perform and/or improper performance of the established obligation may be grounds for bringing you to liability measures provided for by the Policy and/or applicable law. The Operator will keep the above notifications in strict confidence.

13.2. The Controller reserves the right to make changes to the Policy, as well as to this document by posting their new version on the Website, such changes come into force from the date of posting the relevant information on the Website. If any change is unacceptable to you, you must stop using the Website. The Controller. If you do not initiate the termination of relations with the Controller in the manner prescribed by the Policy, such action will finally be considered that the User has accepted the changes.

CONTACT DETAILS

Controller:	
Legal Name:	ORKENDUE LTD
Registration number:	HT00225010
Address:	Misa Building, B.P. 724, Fomboni, Island of Moheli, Comoros Union
Data Protection Officer:	
Contact information:	support@orkendeu.com

This document is only available in English. Any translated copies are not valid.