

## Confidentiality Policy

**GG** service (hereinafter referred to as **GG | Bank**) understands the full significance of protection of information of natural persons, which is stored on our servers or in network. The data protected by us are “Personal Data”. These are any information relating to a natural person that is not public and is considered confidential by agreement of the parties or in accordance with applicable law. This Confidentiality Policy contains information about which personal data we collect, how we use it, store and protect. The present policy also describes the reasons and consequences for disclosure of personal data to third persons.

To fulfill regulatory obligations as to know your customer rule (“KYC”) and anti-money laundering (“AML”) **GG | Bank collects and processes the following personal data:**

- Full name
- Residence address
- Contact details (phone number, e-mail address)
- Date and place of birth, gender, place of citizenship
- Bank account information and/or credit card information
- Your status as a politically significant person
- Source of funds and address confirmation
- Passport and/or national driver’s license or state identity card to prove your identity

**The main purpose of using personal data by GG | Bank** is to render services connected with the customers’ wallets. The Personal Data can be used for the following purposes:

- 1) Compliance with laws and regulations, namely anti-money laundering laws and KYC procedures (Know your customer), self-regulation, risk management, fraud prevention and security requirements, which may include (among other things) personal identity verification of wallet holder and identity verification for money laundering, financing of terrorism or similar established lists of supervision by the regulatory bodies or similar bodies;
- 2) prevention and investigation of fraud or other criminal activities;
- 3) verification of the Customer’s financial position, identity and payment;
- 4) development of new and improvement of already existing offers of services and products;
- 5) improving security of the Services;
- 6) sending notifications on changes in the System services.

We will process your Personal Data legally and fairly and won’t use them beyond the specified purposes.

**The Personal Data can be transferred to third persons in the following cases:**

- upon request of the government bodies authorized to receive such information;
- for confirmation of your identity, personal data can be transferred to third-party identity verification services to compare information provided by you with public records and other third-party databases.
- for fulfillment of obligations towards our customers the Personal Data can be transferred to the agents and third parties acting by agreement with **GG | Bank**. Such third parties include acquirers, card-issuing banks, international card systems, telecommunications service providers, billing companies, GG | Bank Affiliates. Third parties shall take all measures to protect the personal data received by them.

The Personal Data are protected by the relevant physical, technological security and safety management measures. We check our procedures and security measures on a regular basis to make

sure that they are duly performed and remain effective and reasonable. Each user is covered by our confidentiality policy and procedures of personal data protection. Security measures are taken on the web-site of **GG | Bank** to protect from loss, misuse and unauthorized modification of data under our control.

*A Personal data owner is endowed with the following rights towards their Personal data:*

- the right to access to their Personal Data;
- the right to correct their Personal Data, if they are inaccurate.
- the right to delete data upon fulfillment of certain obligations. This right is not absolute and applies only in certain circumstances.
- the right to limit personal data processing. The data owner may restrict the way how GG | Bank uses their Personal Data. In this case and, if applicable, GG | Bank will store Personal Data only in accordance with the applicable law, but they will not be processed for anything else.
- the right to object: in some cases, the Data Subject is entitled to object against certain processing, for example, if the Data Subject does not want GG | Bank to contact them for marketing purposes.
- the right to request a copy of their Personal Data in a digital format.

GG | Bank stores personal data as long as it is necessary to comply with legal obligations. Unless otherwise specified, we store your personal data (name, address, contact details) for at least 6 years, then they will be destroyed.

If you have given your consent for using your data for direct marketing, we will retain such data, until you inform us otherwise and/or revoke your consent.

GG | Bank from time to time checks and improves this Confidentiality Policy and can make changes herein. That's why the Personal Data owners shall periodically check the website of GG | Bank to make sure they are aware of the latest version.

Confidentiality Policy last updated: *January 21, 2021.*