

# Swipe2Trade Privacy Notice

**Last Updated:** April 25, 2023

## 1. Why Do You Need this Privacy Notice?

We encourage you to carefully read this Privacy Notice as it provides you with information about your personal data being processed in connection with your access to and use of the Website. This Privacy Notice also governs the processing of personal data in relation to the Communication Channels.

In this Privacy Notice, personal data and personal information are used as synonyms and mean any information that directly or indirectly identifies you as an individual. In this Privacy Notice we explain which types of personal data we hold on you, how we collect and process such data, how long we keep it, and so on.

## 2. Where Can You Find the Definitions?

Unless otherwise provided in this Privacy Notice, capitalised terms used in this Privacy Notice have the meaning determined in the [Swipe2Trade Legal Notice](#) (the “**Legal Notice**”). We encourage you to read the Legal Notice carefully as they affect your obligations and legal rights.

## 3. Who Are We and How to Reach Us?

When we say “**we**”, “**us**”, or “**our**”, we mean [Swipe2Trade](#). With respect to personal data collected when you access and use the Website and Communication Channels, we act as a data controller.

We process your personal data in accordance with this Privacy Notice and we endeavour to comply with the applicable data protection legislation, which includes the General Data Protection Regulation, also known as the GDPR (the “**Applicable Legislation**”).

If you have any questions regarding this Privacy Notice or the processing of your personal data, do not hesitate to contact us via the following contact details:

**Name:** Swipe2Trade  
**Email:** support@swipe2trade.io

## 4. What Are Our Principles?

**Lawfulness.** We endeavour to process personal data in accordance with the Applicable Legislation and only on the basis of the appropriate legal grounds.

**Fairness.** We do our best to handle personal data in ways that you would reasonably expect and we do not use any personal information in ways that have unjustified adverse effects on you. We do not deceive or mislead data subjects when we collect their personal data.

**Transparency.** We endeavour to make the processing activities transparent and understandable for you, including by providing you with all reasonably necessary information regarding the processing.

**Data Minimisation.** We endeavour to process only necessary personal data, taking into consideration the requirements of the Applicable Legislation.

**Purpose Limitation.** We process your data only for the purposes it was collected. If we establish any other purpose, we will inform you reasonably in advance.

**Accuracy.** We endeavour to ensure the accuracy of your personal data, including by providing you with the opportunity to rectify or complete it.

**Confidentiality, Integrity, and Availability.** We try to comply with the best practices applicable to the development and maintenance of the security systems.

**Storage Limitation.** We keep the personal data as long as prescribed in this Privacy Notice, based on the purposes the data was collected.

**Accountability.** We endeavour to comply with the Applicable Legislation, and, furthermore, if we disclose personal data to any person, we will do our best to ensure that such person will comply with the terms of the Applicable Legislation and this Privacy Notice.

## 5. What Personal Data Do We Collect?

The categories of personal data we collect depend on how you interact with us, use the Website or Communication Channels, and the requirements of the Applicable Legislation. We collect and process the following types of personal data as outlined below. Please note that we may also collect certain other information, which may be required under the applicable laws.

<i>Category of Data</i>	<i>Examples</i>	<i>Description or Comments</i>
<b>Application Data</b>	name	-
	email address	-
	country	-
	social networks	Collected only from experts
	contact details	Collected only from experts
<b>Subscription Data</b>	email address	-
<b>Technical Data</b>	internet protocol (IP) address	This means a unique address of a device, which allows us to identify your approximate location (country, city, region, ZIP code). For better understanding, IP addresses are expressed as a set of numbers, for instance: 194.150.2.33.
	browser details	This includes information about the browser type and its version.
	device details	This includes information about the type of the device (e.g., computer, tablet, or smartphone) and its model.
	operating system	This means the information about the type and version of the operating system on your

		device (e.g., Windows 10, macOS version 12.4, etc.).
<p><b>Analytical and Statistical Data</b></p>	<p>(a) Internet Protocol (IP) address;  (b) the type of device used;  (c) the device operating system;  (d) the browser used;  (e) information regarding your use of the Website, for instance, when you clicked a certain button or made some input.</p>	<p>When you access and use the Platform, certain data may be collected automatically via Google Analytics and Urchin Tracking Module (UTM). More information regarding Google Analytics is available <a href="#">here</a> and more information regarding UTM is available <a href="#">here</a>.</p> <p>After collecting the personal data, Google creates reports about the use of the Website, which contain the aggregated information where we do not see any data pertaining to a particular person. In other words, we cannot identify you from the other users. For better understanding, IP address means an “online address” of a device, which may help to identify your approximate location (e.g, country, city or region, ZIP code). The IP addresses are expressed as a set of numbers, for example: 194.150.2.33. Please note that according to <a href="#">Google’s documentation</a>, the IP address is anonymised (masked), so neither we nor Google can identify the IP address and precise location of a particular visitor. We gather the information by means of placing cookies. Cookies are a feature of the software that allows web servers to recognise the device used to access the Website. A cookie is a small text file that the Website saves on your device when you visit thereof. They allow the Website to remember your actions and preferences over a period of time.</p> <p>Google solutions are operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, and its affiliates including Google LLC, 1600, Amphitheatre Parkway, Mountain View, CA, 94043, USA (collectively, “Google”).</p> <p>To our knowledge, the data collected via Google solutions is not anonymised (with the exception of the IP address) and will be transmitted to, processed and stored by Google in the United States. You can learn more about how Google processes personal data in <a href="#">Google’s privacy policy</a>. Note that competent US state authorities may have</p>

		<p>access to the personal data collected via Google solutions.</p> <p>With respect to the personal data collected via Google solutions, Google acts as our data processor. However, Google may use this personal data for any of its own purposes, such as profiling and cross-platform tracking. In this case, Google acts as an independent data controller.</p>
<b>Contact Data</b>	full name	-
	contact details	This may include your email address, messenger details, or phone number.
	any other data requested by us or data that you choose to provide us with	Please do not provide personal data unless it is reasonably necessary or requested by us.
<b>Social Media Data</b>	nicknames, names, and/or photos	<p>When you access or otherwise join our Communication Channels, you will need to use certain social media (the “<b>Social Media</b>”).</p> <p>In general, Social Media makes available the respective statistical information to us in an anonymised form. It is impossible for us to make any conclusions about individual users and access to individual user profiles relying solely on such information.</p> <p>Certain categories of personal data and processing details vary depending on the Social Media, therefore, please refer to the respective Social Media listed below.</p>
	messages, comments, and other communications	
	information provided to us by the respective Social Media as outlined below	
	other data that you choose to provide us with	
Instagram Data	<ul style="list-style-type: none"> <li>(i) visits to our Communication Channels;</li> <li>(ii) range of contributions;</li> <li>(iii) information about countries and cities where our visitors come from;</li> <li>(iv) statistics about the gender ratios of visitors; and</li> </ul>	<p>Our Instagram accounts are operated by Meta Websites Ireland Limited, the service provider for Instagram (“<b>Instagram</b>”). Instagram collects and processes your personal data to the extent described in its privacy policy which can be found <a href="#">here</a>.</p> <p>We and Instagram have entered into a so-called joint controller agreement, available <a href="#">here</a>, to comply with the requirements of the Applicable Legislation.</p>
Twitter Data		Our Twitter accounts are operated by Twitter, Inc. or Twitter International Unlimited Company depending on where you are

	(v) other statistical information related to the use of our Communication Channels.	located (“ <b>Twitter</b> ”). Twitter collects and processes personal data to the extent described in its privacy policy which can be found <a href="#">here</a> .
YouTube Data		YouTube is operated by Google (as defined above). Google processes personal data collected via YouTube in accordance with its Data Processing Terms which may be found <a href="#">here</a> .
Facebook Data		Our Facebook profiles are operated by Facebook Ltd. (“ <b>Facebook</b> ”). Facebook collects and processes personal data to the extent described in its privacy policy which can be found <a href="#">here</a> .  We and Facebook have entered into a so-called joint controller agreement, available <a href="#">here</a> , to comply with the requirements of the Applicable Legislation.
Telegram Data	certain anonymised statistical information regarding the use of our Telegram groups, chats, bots and/or channels.	Our Telegram channels, groups, and bots are operated by Telegram Messenger Inc. (“ <b>Telegram</b> ”). Telegram collects and processes personal data to the extent described in its privacy policy which can be found <a href="#">here</a> .
Medium Data	visits to our Medium blogs	Our Medium blogs are operated by A Medium Corporation (“ <b>Medium</b> ”). Medium collects and processes personal data to the extent described in its privacy policy which can be found <a href="#">here</a> .
	the number of visitors who saw our posts, took the time to actually read or recommend them	
	other statistical information regarding the use of our Medium blogs	

## 6. How Do We Use Personal Data?

<i>Category of Data</i>	<i>Description</i>	<i>Lawful Basis for Processing</i>
<b>Application Data</b>	To whitelist you to use the Swipe2Trade platform.	To take steps at your request prior to entering into a <b>contract</b> , and, further, to perform a <b>contract</b> with you.

<b>Subscription Data</b>	To provide you with marketing and newsletter emails concerning the Project, as well as general updates.	<p>Your <b>consent</b>. You may revoke your consent and unsubscribe from receiving marketing and newsletter emails from us at any time by (i) contacting us; or (ii) clicking the unsubscribe button available at the bottom of each marketing and newsletter email.</p> <p>In such a case, we will delete your email address from the respective marketing database.</p> <p>Please note that administrative or service-related communications (security alerts, email verifications, maintenance notifications, etc.) are not considered marketing and such communications may not offer an option to unsubscribe.</p>
<b>Payment Data</b>	To carry out certain Transactions, arising out and in connection with your use of the Services.	To perform a <b>contract</b> with you.
		Our <b>legal obligation</b> to keep and retain the financial records to comply with the applicable laws.
		Our <b>legitimate interest</b> as well as the interests of other Users to prevent and detect fraud and abuse, and protect the security of our Users.
<b>Technical Data</b>	To ensure the operation of the Website.	To perform a <b>contract</b> with you.
	To provide a better user experience by improving functionality, usability, user flow and interface of the Website.	Our <b>legitimate interest</b> to improve the Website functionality and user experience, detect fraud and respond to requests from authorities.
<b>Analytical and Statistical Data</b>	To analyse the use of the Website and provide a better user experience by improving the Website user flow and interface.	Your <b>consent</b> .
<b>Contact Data</b>	To respond to your inquiry.	Our <b>legitimate interest</b> to respond to your inquiry.
<b>Social Media Data</b>	To communicate with the visitors, participants, or subscribers.	Our <b>legitimate interest</b> to achieve the purposes outlined herein.

	To handle requests from visitors via the Communication Channels.	To take steps at your request prior to entering into a <b>contract</b> and further to perform such a <b>contract</b> , if and to the extent you wish to enter into a contractual relationship with us.
	To obtain statistical information about the reach of the Communication Channels.	
	To conduct customer surveys, marketing campaigns, market analyses, or other promotions and events.	

## 7. How Long Do We Process Your Data?

As a general rule, we keep personal data as long as it is necessary for the purposes it was collected. We may process certain personal data longer than outlined below, if it is necessary:

- (a) to meet our legal obligations under the applicable law;
- (b) in relation to anticipated or pending legal proceedings; or
- (c) to protect our rights and legitimate interests or those of third parties.

<b>Category of Data</b>	<b>Storage Period</b>	<b>Rationale</b>
<b>Application Data</b>	Until you create an account with the Swipe2Trade platform.	Considering the purpose of data collection, we store this data until you create your account with the Swipe2Trade platform.
<b>Subscription Data</b>	As long as you remain a subscriber.	We process such data only until you opt out from receiving our marketing and newsletter emails.
<b>Technical Data</b>	Except for the IP address, the data is stored during the access session. The IP address is stored for one (1) year following our last communication with you.	We set this retention period for the IP address due to the statutes of limitations established in the Legal Notice.
<b>Analytical and Statistical Data</b>	Up to two (2) years. You may find specific timelines <a href="#">here</a> .	We need such data for the purposes outlined by us above. Specific timelines are set in the Google settings.
<b>Contact Data</b>	For one (1) year following our last communication with you.	We set this retention period due to the statutes of limitations established in the Legal Notice.
<b>Social Media Data</b>	No retention period for statistical and analytical information.	We do not establish any retention period for statistical and analytical information, because such

	<p>The personal data you provided us with is stored as long as it is not deleted by you or respective Social Media.</p> <p>Other personal data is processed as long as it is necessary for the purposes it was collected, unless otherwise is expressly provided, e.g. in a specific consent form or privacy notice or statement.</p>	<p>information does not allow us to identify any particular individual.</p> <p>We may not be able to erase the personal data you provided us within the Communication Channels, therefore, such data is processed until either you or respective Social Media delete it.</p>
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## 8. How Do We Share Your Data?

**General.** We do not sell or rent out your personal data. However, we may share your personal data in accordance with this Privacy Notice, Applicable Legislation, or with your consent, in each case for the purposes of and if it is reasonably necessary:

- (a) to provide you with access to the Website and Communication Channels, and/or to perform our undertakings with you;
- (b) for compliance with the applicable laws and regulations; or
- (c) for our legitimate interest to maintain, improve and develop the Website and Communication Channels.

Please note that if we share any portion of your personal data with third persons, we will endeavour to secure such transfer using appropriate legal, organisational, and technical measures.

**Recipients.** Given the purposes outlined above, your personal information is shared with the following categories of recipients:

- (a) Affiliates;
- (b) our contractors and suppliers who need to have access to your data in order to allow you to use certain functionality of the Website and Communication Channels;
- (c) analytical solution providers, such as Google;
- (d) support and technical teams;
- (e) forms service provider;
- (f) email delivery service providers;
- (g) hosting service providers;
- (h) government authorities, upon their request or if necessary to comply with our legal obligations;
- (i) another entity if we sell or otherwise transfer the Website or its part; and
- (j) other third-party solutions, which may be from time to time integrated in relation to the Website and Communication Channels.

## 9. Do We Transfer Your Personal Data to Third Countries?

Sometimes we may transfer your personal data to countries that do not offer the same level of data protection as the laws of the European Union or your country. In case we transfer your personal data to a country that does not maintain the “adequate” level of data protection, as defined by the [European Commission](#), we will put in place suitable safeguards, which give you more protection and control regarding your personal data, and take reasonable steps to ensure that your privacy rights continue to be protected as outlined in this Privacy Notice and provided for in the Applicable Legislation. As a general rule, we will use the [Standard Contractual Clauses](#) (special documents developed by the European Commission) as an appropriate safeguard. You may reach us via the contact details indicated herein to ask whether your personal data is subject to transfer to a third country.

## 10. What About Interacting with Third-Party Links?

The Website or Communication Channels may include links and social media plugins to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share certain data about you. We do not control these third-party websites and applications, and are not responsible for their privacy statements. When you leave the Website or Communication Channels, we encourage you to read the privacy policy/notice/statement of every website or application you visit.

## 11. What About Securing Your Personal Data?

We strive to do our best to keep your personal data secure. We always review and update appropriate technical and organisational measures to (i) keep your personal data secure in accordance with the Applicable Legislation, our internal policies and procedures regarding the storage of, access to, and disclosure of personal data; and (ii) protect you against unauthorised or unlawful processing of personal data and accidental loss or destruction of, or damage to them. We endeavour to implement and maintain technical and organisational measures, which are appropriate to the harm that might result from the unauthorised or unlawful processing or accidental loss, destruction, or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures. Your personal information may undergo anonymisation, pseudonymisation, and/or encryption to ensure safe transfer and/or processing.

## 12. What Data Subject Rights Do You Have?

**General.** According to the Applicable Legislation, you may have the rights outlined below. In order to exercise your rights as a data subject, we may request certain information from you to verify your identity and confirm that you have the right to exercise such rights.

**Data Subject Rights.** According to the Applicable Legislation, you may have the following rights:

<i>Rights</i>	<i>Description</i>
Right to <b>access</b> your personal data (commonly known as a “ <b>data subject access request</b> ”)	This enables you to ask us whether we process your personal data. If we process your data, you may request certain information about the processing activity and/or a copy of the personal data we hold about you, and check that we are lawfully processing it.
Right to <b>rectification</b> of the personal data	This enables you to have any incomplete or inaccurate data we hold about you completed or rectified, though we may

	<p>need to verify the accuracy of the new data you provide to us.</p>
<p>Right to <b>erasure</b> of your personal data (commonly known as a “<b>right to be forgotten</b>”)</p>	<p>This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.</p> <p>Note, however, that we may not always be able to comply with your request of erasure for specific legal or technical reasons which will be notified to you, if applicable, at the time of your request.</p>
<p>Right to <b>object</b> to processing of your personal data</p>	<p>This enables you to object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.</p>
<p>Right to <b>restrict</b> the processing of your personal data</p>	<p>This enables you to ask us to suspend the processing of your personal data in the following scenarios: (i) if you want us to establish the data’s accuracy, (ii) where our use of the data is unlawful but you do not want us to erase it, (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.</p>
<p>Request the <b>transfer</b> of your personal data (commonly known as a “<b>right to the data portability</b>”)</p>	<p>We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.</p>
<p>Right to <b>withdraw consent</b></p>	<p>You may withdraw your consent at any time where we are relying on consent to process your personal data.</p>
<p>Right not to be subject to <b>automated decision-making</b></p>	<p>You reserve the right not to be subject to a decision based solely on automated processing of data, including profiling, which produces legal effects concerning you or similarly significantly affecting you. Please note that currently you are not subject to such automated decision-making.</p>

<p><b>Right to file a complaint</b></p>	<p>You may file a complaint with a relevant supervisory authority in case we violate your rights or obligations imposed on us under the Applicable Legislation. The relevant supervisory authority will particularly depend on where you are located.</p> <p>The details of the Lithuanian data protection supervisory authority:</p> <p><b>State Data Protection Inspectorate</b>  Website: <a href="https://vdai.lrv.lt/en">https://vdai.lrv.lt/en</a>  Address: L. Sapiegos str. 17, LT-10312, Vilnius, Lithuania  Phones: +370 5 271 2804 / 279 1445  E-mail: <a href="mailto:ada@ada.lt">ada@ada.lt</a>.</p>
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### 13. Do We Process Children’s Personal Data?

The Website and Communication Channels are not intended for the use of children (under 18 years old or older, if the country of your residence determines a higher age restriction). We do not knowingly market to, solicit, process, collect, or use personal data of children.

If we become aware that a child has provided us with personal information, we will use commercially reasonable efforts to delete such information from our database. If you are the parent or legal guardian of a child and believe that we have collected personal information from your child, please contact us.

### 14. Can We Modify and Update this Privacy Notice?

We keep our Privacy Notice under regular review and we may update it at any time. If we make any changes to this document, we will change the “Last Updated” date above. Please review this Privacy Notice regularly to check for the updates. If we make substantial changes to the way we treat your personal information, we will either (i) display a notice on the Website, or (ii) notify you by email prior to the change becoming effective.