

PRIVACY POLICY
UAB CE-INTERNATIONAL

By using our Platform, you consent to the collection, use and storage of your personal data and other information.

We provide this Privacy Policy to let you know all our procedures regarding the collection, use, disclosure, storage, refinement, updating, modification, extraction, transfer, distribution, provision, access, blocking, deletion and erasure of information through <https://cryptadium.com> (the site (website), Service or Platform). For us, security and privacy of your personal data are always the priority. Every day we work hard to keep your personal data safe. We use it strictly in compliance with this Privacy Policy and applicable international legislation. We want to develop our service with your help and provide you with high-quality services, so we can update and revise this Privacy Policy from time to time.

By using our website and our services, you also agree to our Terms of Use. Please accept our Terms of Use if you wish to use this Platform.

CE- INTERNATIONAL (Cryptadium) is a payment system that accepts payments in cryptocurrencies and protects your income from exchange rate fluctuations in the cryptocurrency exchange. If you wish, Cryptadium can convert all incoming funds into stablecoins, i.e. cryptocurrencies with a stable exchange rate that is tied to the dollar.

CE-INTERNATIONAL UAB (Cryptadium (Project)) is International Fintech Company engaged in creating a blockchain ecosystem worldwide.

Cryptadium makes it easier to work with foreign buyers and makes your business more open to new customers and partners. Cryptadium is suitable for paying any goods or services in cryptocurrency and helps your shop reach a new audience of customers.

Cryptadium allows to accept cryptocurrency donations from around the world for your project to be able to gain support in other countries and raise more money. Cryptadium will help to start rapid growth in the field of cryptocurrency commerce and get an advantage over competitors from the first days of work.

We are CE-INTERNATIONAL – a company registered in conformity with the law of Lithuania.

Our registered address is Eišiškių Sodų 18-oji g. 11, Vilnius.

Our official website: <https://cryptadium.com>

1. CONTROLLER AND PROCESSOR

The company CE-INTERNATIONAL (Service or Platform) acts both as the Controller and the Processor of your personal data.

By submitting your personal data, you consent to its further processing by CE-INTERNATIONAL and agree to receive any informative messages and other service notifications.

By accepting these Terms of Use and agreeing to be legally bound by them, you agree that your access and use of the Service must be at all times performed by you in strict accordance with the following general rules:

- you must use the Service in accordance with its designated purpose only;
- your accessing and use of the Service must be performed by you in full compliance with this Policy, Terms of Use, other applicable documents related to the Service and all applicable laws;
- you must always provide true and complete information about yourself and the parties you represent;
- you must not perform any actions expressly prohibited by this Policy.

In case of violation of the rules of this Policy, the user's access to the service may be blocked for the duration of the internal investigation of the violation.

2. PRINCIPLES OF PROCESSING PERSONAL DATA

We avoid collecting unnecessary personal data and try to gather only important information for us with the purpose of data processing and retention.

Our dealings with the Users are based on legal documents and the Website Terms of Use on the website and on the User's explicitly consent for personal data processing in form of declaration (signed electronically) as a mandatory part of Cryptadium account registration or for using of specific Cryptadium features.

YOU HEREBY CONFIRM THAT YOU ARE PERSONALLY RESPONSIBLE FOR THE GIVING OF THE CONSENT TO THE COMPANY CE- INTERNATIONAL TO USE OF YOUR PERSONAL DATA FOR THE EFFECTIVE PROVISION OF SERVICES THROUGH OUR SERVICE.

UNLESS OTHERWISE SPECIFIED CE- INTERNATIONAL WILL ASSUME THAT THE CONSENT HAS BEEN SOUGHT AND GIVEN WHEN REGISTERING AT THE CE- INTERNATIONAL PERSONAL ACCOUNT.

When you use the Service, you may provide us with additional information about you. When you use the Service, we may also collect information related to your use of the Service and aggregate this with information about other users. This helps us improve our Services for you.

The company processes personal data only on a legal and fair basis:

The company does not disclose to third parties and does not distribute personal data without the consent of the User (except for the cases when, in accordance with current international legislation, these actions are allowed without the consent of the personal data subject);

The company determines specific legitimate purposes before the start of processing (including collection / receipt) personal data;

The processing of personal data in the Company is limited to the achievement of specific, predetermined and legitimate goals.

3. DEFINITIONS

The definitions below will help you better understand the Privacy Policy:

«Personal Data» or «Personal Information» means any information that identifies or can be used to identify any natural person, directly or indirectly, including but not limited to: first and last names, date of birth, email address, occupation, work performance data, gender or other demographic information.

«Controller» means a person or organization which, alone or jointly with others, determines the purposes and means of processing Personal Information.

«You» or «User» («Member») means a natural person who has reached the age of full legal capacity in accordance with the laws of the country of residence, but is in any case at least 18 years old, registered with the platform as the User and accepted the Policy, Terms of Use and the Offer Agreement.

«Processing» of Personal Information means any operation or set of operations which are performed to tackle Personal Information, whether or not by automated means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, use, disclosure or dissemination, and erasure or deletion.

«CE-INTERNATIONAL» or «Website» or «Platform» or «us» or «we» or «Cryptadium» means UAB CE-INTERNATIONAL, company registered and acting under the law of Lithuania, registration number 306031653, registered address: Eišiškių Sodų 18-oji g. 11, Vilnius.

«Personal data information system» is a complex of personal data contained in databases and ensuring their processing, information technology and technical resources.

«International transfer of personal data» is the transfer of personal data to the territory of a foreign state to a foreign government authority, as well as a foreign individual or a foreign legal entity.

4. WHAT INFORMATION DO WE COLLECT?

Our company avoids collecting unnecessary personal data and tries to gather only important information for us with the purpose of data processing and retention. When you visit our website you may provide us with two types of information: personal information you knowingly choose to disclose that is collected on an individual basis and website use information collected on an aggregate basis as you and others browse our website.

YOU HEREBY CONFIRM THAT YOU ARE PERSONALLY RESPONSIBLE FOR GIVING YOUR CONSENT TO THE COMPANY CE-INTERNATIONAL TO USE YOUR PERSONAL DATA FOR THE EFFECTIVE PROVISION OF SERVICES THROUGH OUR SERVICE.

UNLESS OTHERWISE SPECIFIED, CE- INTERNATIONAL WILL ASSUME THAT THE CONSENT HAS BEEN SOUGHT AND GIVEN WHEN REGISTERING ON THE PLATFORM.

You may provide us with additional information about you, using the service. When you use the Service, we may also collect information related to your use of the Service and aggregate this with information about the other users. This helps us improve our Services for you.

There is a limited list of personal information from you as a visitor or authorised person of Cryptadium that we may collect:

- Personal Information. This information may include your name and surname; login and password; email address; post code; billing address; phone number; internet protocol (IP) address used to connect your computer to the Internet; computer and connection information such as browser type, version, and time zone setting, browser plug-in types and versions, operating system, and platform; language; date of registration; internal user id; date of birth; passport number; personal id in social media; browsing history of companies; tracking functionality "Send data in SMS"; Tracking Functionality "Get directions"; data of the beginning and duration of user sessions; information during the user session; biometric personal data (photos); passport data, ID card data or data of other documents identifying the user's identity.
- Related information. Some of the Data that we acquire cannot be identified. We may also collect information such as demographic data, information about your use of the service and general data related to the platform (Non-identifying information). We may collect information received from registered and unregistered users of the platform.
When you visit our Website, we may collect certain information automatically from your device. Data from mobile devices (for example location). We can use such information, received from other services. You can hide it from us. If you don't know how to disable your device's location services, we recommend that you contact your mobile service carrier or your device manufacturer
- Third parties may also provide us with information about you. From time to time, we may receive personal information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. The types of information we collect from third parties may include marketing information provided by trade shows and professional and other relevant

information available to us on social networks about employment candidates. We use the information we receive from these third parties to allow us to make more informed decisions, improve the accuracy of records we hold, and occasionally to reach out to you regarding items or issues we believe interest you. If we combine this information with information about you, collected through the service, we will continue to consider this combined information as indicated in this Privacy policy.

When you use our platform, you consent to the collection of your personal information, you agree to us sending you emails including our use of your information for marketing emails to promote our products or products similar to our products or services. You may withdraw your consent at any time by unsubscribing to our emails by using an opt-out link contained in every email.

5. USER REQUIREMENTS

If you have an intention to use the platform, you should meet the following requirements:

In case: you are a natural person:

(1) You should be at least 18 (eighteen) full years old, and

(2) You should be of legal age under the jurisdiction from which you access and use the Service. If you are at least 18 years old but are a minor under the laws of your country of residence, you must read this Privacy Policy and have the legal representative who will act on your behalf.

CE-INTERNATIONAL is in no way responsible for the intentional actions of third parties with the aim of substituting or replacing a user or a company. This user is personally liable for any actions.

6. HOW DO WE USE THE INFORMATION THAT YOU PROVIDE TO US

We use personal information for purposes of administration our business activities, providing service and support and making available other products and services to our clients and prospective customers, users. Occasionally, we may also use the information we collect to notify you about important changes to our website, new services and special offers we think you will find valuable. The lists used to send you product and service offers are developed and managed under our traditional standards designed to safeguard the security and privacy of all personal information provided by our users. You may at any time to notify us of your desire not to receive these offers.

We use your personal data strictly according to the GDPR, other applicable legislation, Privacy Policy, Offer for the Provision of Services and the Website Terms of Use on the website and for the one of the following purposes:

- to send administrative information to you;
- to protect our Services;
- to enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract;
- to identify a client;
- to respond to legal requests and prevent harm.
- to send you marketing and promotional communications;
- deliver targeted advertising to you;
- for notifications and security confirmations;
- to communicate with the Clients;
- personalization of the content and/or user experience;
- account set up, login and administration;

- responding to your requests;
- maintaining internal statistics
- improving our services;
- internal research and development purposes;
- providing services;
- to honor our contractual commitments to you;
- providing our users with our platform and related functionality.

Also we inform you about the cases when the third person can request from us your personal information:

- in response to lawful requests by public authorities, including to meet legitimate national security or law enforcement requirements;
- to protect, establish, or exercise our legal rights or defend against legal claims, including to collect a debt; to comply with a subpoena, court order, legal process, or other legal requirement;
- or when we believe in good faith that such disclosure is necessary to comply with the law, prevent imminent physical harm or financial loss, or to investigate, prevent, or take action regarding illegal activities, suspected fraud.

Please note that the abovementioned lists are not exhaustive. We will record all the purposes for which we process your personal data. We may also use your Data collected from the Service to provide and improve the service, process your requests, prevent fraud, provide you with information and advertising that may interest you, comply with the law and in other cases approved by your consent.

7. INTERNATIONAL DATA TRANSFERS

For Personal Information subject to the General Data Protection Regulation (EU) 2016/679 ("GDPR") we may transfer your Personal Information outside the EEA for the Permitted Purposes as described above. This may include countries that do not provide the same level of protection as the laws of your home country (for example, the laws within the EEA or the United States). We will ensure that any of such international transfers made are subject to the corresponding safeguards if required by the GDPR or other relevant laws. We have also implemented appropriate safeguards to ensure such a level of data protection when transferring your personal data, including the conclusion of data transfer agreements incorporating the European Commission's Standard Contractual Clauses, or other applicable data transfer mechanisms. You may contact us at any time using the contact details below if you would like to get further information on such safeguards.

With respect to persons covered by the GDPR, in case Personal Information is transferred to countries or territories outside of the EEA that are not recognized by the European Commission as offering an adequate level of data protection, we have put in place appropriate data transfer mechanisms to ensure protection of Personal Information.

8. UPDATING PERSONAL DATA

This Privacy Policy may be updated periodically to reflect changes in our privacy practices. If any of the Personal Information that you have provided to us changes, for example if you change your email address or if you wish to cancel any request that you have sent us, please let us know by contacting support service.

We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Information that you provide to us.

9. USER RIGHTS COVERED BY THE GDPR

You have a number of legal rights under the GDPR in relation to the Personal Information that we hold about you. These rights include:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process 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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Objecting to, and requesting us to restrict our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict our processing of your personal information but we are legally entitled to refuse that request;
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. 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.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
If you wish to exercise any of the rights set out above, please contact us directly at cryptadium@gmail.com .

10. ANALYTIC PROVIDERS, AD SERVICES AND THIRD PARTIES

We may work with advertising agencies and vendors who use technology to help us understand how individuals use our Website. These vendors may use technologies to serve you advertisements that may interest you. You can choose to opt out of receiving interest-based advertising. Our service is not responsible for external advertising and cannot guarantee its absence. Advertisements appearing on our Sites may be delivered to users by us or one of our advertising partners. Our advertising partners may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement. In this way, ad servers may compile information about where you, or others who are using your computer, saw their advertisements and determine which ads are clicked on. This information allows an ad network to deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by Shimano only, and does not cover the use of cookies by any advertisers

11. USE OF AUTOMATED DECISION-MAKING

You hereby shall be duly informed on the existence of automated decision-making algorithms (including profiling) used by the websites that help us to improve our experience of communication with you as our User and customize future experience for you.

For example, such automated decision-making algorithms may help us to set up your profile based on your browsing history, user sessions and advertisement that you view.

12. WHERE DO WE STORE AND PROCESS PERSONAL DATA?

Our company adopted all statutory requirements with regards our obligations as a data controller and/or processor under GDPR to provide you with adequate level of data protection. However, you should be aware that CE –INTERNATIONAL is a company registered and acting under the law of Lithuania, supporting high standards of personal data protection on high level.

CE-INTERNATIONAL has taken all appropriate precautions to ensure that our customers comply with the highest standards and principles for the protection of Personal Data in accordance with GDPR and other relevant international standards, including applicable legislation.

To facilitate our global operations, we may transfer and access personal data from around the world. This Privacy Policy shall apply even if we transfer personal data to other countries.

13. COOKIES

We use cookie identifiers and other similar tracking technologies to allow you to benefit from some of Cryptadium's essential functions.

We may automatically collect Usage Data through the use of "cookies". Cookies are small text files that a website uses to recognize repeat users, facilitate the user's ongoing access to the website, and facilitate the use of the site. Cookies also allow a website to track usage sessions and compile website usage information that will enable improvement of our service. You can find detailed information in the Cookies policy on our website.

14. WHEN DO WE SHARE PERSONAL DATA

We always treat personal data confidentially and do not disclose your personal data to other Users, organizations or individuals if such disclose is not necessary for providing Cryptadiums services or conducting our business operations with you, as it is outlined above in the purposes for processing of such data.

In addition to the disclosures outlined within this Privacy Policy, we may disclose information about you:

- to the extent that we are required by the law;
- in connection with any legal proceedings or prospective legal proceedings;
- in order to establish, exercise or defend our legal rights - including providing information to others for the purposes of fraud prevention and reducing credit risk;
- to the companies (executors) regarding which the users request SMS messages with contact information;
- to Third Parties in case of: merger, restructuring, joint venture, assignment, sale of part of the business or the whole business.

In addition, we may share data with the trusted partners to contact you based on your request to receive such communication, help us perform statistical analysis, or provide customer support. Such third parties are prohibited from using your personal data except for these purposes, and they are required to maintain the confidentiality of your information. If you do not want us to share your personal data with these companies, contact us.

In addition, we will transfer user data to the companies (executors) that are registered through their representative in the back office on our service, in case these users request contact information SMS about such companies (executors). In such cases, the following data is subject to transfer: Name, Surname, Phone Number, E-mail, Time of the Request.

We can cooperate with other companies and people to provide services to the users of our website and may need to share your information with them to provide information, products or services to you. The examples may include analyzing data and providing additional services. In all the cases when we share your information with such agents, we explicitly require the agent to acknowledge and adhere to our Privacy Policy.

15. HOW DO WE SECURE PERSONAL DATA

We always take care of your personal data safety. We provide such opportunities to protect your information from violent abuse. In accordance with the requirements of regulatory documents, we have created a personal data protection system (PDPS), consisting of subsystems of legal, organizational and technical protection.

The legal protection subsystem is a complex of legal, organizational, administrative and regulatory documents that ensure the creation, operation and improvement of the PDPS.

The organizational protection subsystem includes the organization of the management structure of the PDPS, the licensing system, and the protection of information when we are working with the partners and third parties.

The technical protection subsystem includes a set of technical, software, hardware-and-software tools that protect personal data.

The main data protection measures used by the Platform are:

1. Appointment of the person responsible for the processing of personal data.
2. Identification of current threats to personal data security during its processing and development of measures to protect personal data.
3. Developing a policy regarding personal data processing.
4. The establishment of individual passwords for employees to access the information system in accordance with their responsibilities.
5. The use of information security facilities that have passed the procedures of conformity assessment in the established manner.
6. Certified anti-virus software with regularly updated databases.
7. Compliance with the conditions ensuring the safety of personal data and excluding unauthorized access to them.
8. Detection of facts of unauthorized access to personal data and taking measures connected with such access.
9. Implementation of internal control and audit.

Your account information is encrypted by using special password, stored in closed database that we do not share with anyone. Encryption is the process of encoding information stored on a device and can add a

further useful layer of security. It is considered an essential security measure where personal data is stored on a portable device or transmitted over a public network.

16. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We keep the information no longer than it is reasonably necessary. This means that we will keep your personal information for any or a combination of time periods described as follows:

- for as long as required by the law,
- until we no longer have a valid reason for keeping it,
- until you request us to stop using it,
- or for as long as our customer who you legally represent remains our customer.

If you do not want to use our services, you can immediately delete your personal data.

We reserve the right to keep information that is reasonably necessary after closing your account when it is required to comply with the applicable tax/revenue laws, resolve disputes, and enforce our agreements. We will delete this information as soon as such data become not needed but no later than 3 years after the closure of your account.

17. YOUR RIGHTS IN RELATION TO PERSONAL DATA

We appreciate our clients, but also we appreciate their freedom of choice. You can withdraw your consent to our processing of your information and your use of our services. You are able to do it at any time by deleting your account by sending an email to cryptadium@gmail.com to request deleting your personal information.

You have the right to restrict processing your personal data for some purposes. If you have any objection to processing your personal data, you can do so by sending an email to cryptadium@gmail.com

We may decline a request for access to or correction of personal information in the circumstances prescribed by the Law, and if we do so, we will provide you with a written notification that enunciates the reasons for the refusal.

We are able to provide you with a copy of all the personal data that we have regarding you in an electronic format. You always have the ability and capacity to export your personal data collected or stored digitally concerning you as our Member by sending your request via email to cryptadium@gmail.com

You can ask us what personal information of yours we hold and what we do with your data. If you would like, we can also provide you with a copy of any personal data that we hold about you.

18. INFORMATION ABOUT CHILDREN

We will not knowingly collect Personal Information via the Site from users younger than thirteen (13) years of age. The website is not intended for or targeted at natural persons under 18. If you believe that we have collected information about a natural person under 18, please contact us at cryptadium@gmail.com, so that we can delete the information.

19. QUESTIONS, COMMUNICATIONS

If you have any questions regarding your personal information, want to execute your rights or you have concerns or complaints, please contact us by sending an email.

If you wish that we do not use the information you provided to us, please drop us an e-mail to cryptadium@gmail.com with "Don't use my data" title and your name inside.

In order to update or correct your personal data please contact Global Data Protection Officer by sending a message to cryptadium@gmail.com

There could appear some cases when CE-INTERNATIONAL may contact you. In light of the fact that each account on the website is required to keep a relevant e-mail address, all the notifications from CE-INTERNATIONAL should be sent to your e-mail. Push notifications could also be used on our website in order to inform you about some warning or important information.

In general, we may send you notifications and other information that we deem necessary (including some advertising information) by one of the communication methods described below:

- Messages by email or by push notifications (e.g. about creating accounts)
- Messages by phone (e.g. about additional services booked by you on the platform)
- Messages by email (e.g. about transactions, your account security, etc.)
- Messages by email or in your account (e.g. offer to evaluate the quality of the services).

20. LINKING TO OTHER WEBSITES/THIRD PARTY CONTENT

Our website may provide links to other websites. We do not control and are not responsible for the content or practices of such other websites. Our provision of such links does not constitute our endorsement of such other websites, their content, their owners, or their practices. This Privacy Policy does not apply to such other websites, which are subject to the privacy and other policies they may have.

21. PRIVACY POLICY CHANGES

We may update this Privacy Policy from time to time by posting a new version online. You should check this page occasionally for any changes. If we make any substantial changes, we will notify you by posting the revised Privacy Policy on our website and sending notification to your email linked to your account. This helps you to always be aware of what information we collect, how we use it and under what circumstances, if any, it is disclosed. By continued use of the website and Cryptadium services, and/or continued provision of personal data to us, you will be subject to the terms of the Privacy Policy in effect at that moment.

22. HOW TO CONTACT US

If you have any questions or would like additional information about our privacy practices, please do not hesitate to contact us as provided below:

Legal Department

Eišiškių Sodų 18-oji g. 11, Vilnius

Email: cryptadium@gmail.com

Tel: +37070044739