

# MinterCoins.com Privacy Policy

Version 1.0

July 20, 2020

This Privacy Policy (hereinafter — Privacy Policy), whose document is available at <https://mintercoins.com/legal/privacy.pdf>, in accordance with the Federal Law “On Personal Data” from 27.07.2006 N 152-FZ of the Russian Federation (hereinafter the Federal Law) and the General Data Protection Regulation (GDPR) (EU) 2016/679, determines the procedure for processing personal data and measures to ensure the security of personal data provided by Kozhevnikova Violetta Vitalievna, Primary State Registration Number of the Sole Proprietor (PSRNSP) 320237500107980 (hereinafter — Operator), which is addressed to any visitor (hereinafter — User), who uses the Operator’s software complex located at <https://mintercoins.com> (hereinafter the Service), in order to protect the rights and freedoms of a person and citizen when processing their personal data, including the protection of the rights to privacy, personal and family secrets.

Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in the Terms of Use, a document of which is available at <https://mintercoins.com/legal/terms.pdf>.

## 1. Terms and definitions

**Operator** — a state body, municipal body, legal entity or individual that independently or jointly with other persons organizes and (or) performs the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

**User** — a visitor of the Service.

**Personal data** — any information related directly or indirectly to a specific or identifiable User.

**Usage data** — means data collected automatically or generated as a result of using the Service, or from the Service infrastructure itself (for example, the duration of a page visit).

**Cookies** — are small pieces of data stored on the User’s device (computer or mobile device).

**Automated processing of personal data** — processing of personal data using computer technology.

**Blocking of personal data** — temporary termination of processing of personal data (except for cases when processing is necessary to clarify personal data).

**Personal data information system** — a set of personal data contained in databases and information technologies and technical means that ensure their processing.

**Depersonalization of personal data** — actions that make it impossible to determine the identity of personal data to a specific User or other personal data subject without using additional information.

**Personal data processing** — any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

**Provision of personal data** — actions aimed at disclosure of personal data to a certain person or a certain circle of persons.

**Distribution of personal data** — actions aimed at disclosure of personal data to an indefinite circle of persons (transfer of personal data) or at familiarization with personal data of an unlimited number of persons, including disclosure of personal data in the mass media, placement in information and telecommunications networks, or providing access to personal data in any other way.

**Cross-border transfer of personal data** — the transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign individual or a foreign legal entity.

**Destruction of personal data** — actions that make it impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed.

## **2. Types of data collected**

2.1. The Operator collects several different types of information for various purposes in order to provide and improve service to the User.

2.1.1. Personal data.

When using the Service, the User may be asked for certain personal data that can be used to contact or identify the User.

The Operator may use the User's personal data to contact them through notifications about the use of the Service, marketing materials and other information that may interest the User.

The User can always refuse to receive information messages by sending an email to the Operator [privacy@mintercoins.com](mailto:privacy@mintercoins.com) marked "Unsubscribe from notifications of new products and services and special offers".

Personal data may include, but is not limited to:

2.1.1.1. email address;

2.1.1.2. first and last name;

2.1.1.3. phone number;

2.1.1.4. name in Telegram;

2.1.1.5. name in Skype;

2.1.1.6. wallet address;

2.1.1.7. cookies and usage data.

2.1.2. Depersonalized User data collected by web analytics services and the Service itself is used to collect information about the User's actions on the site, improve the quality of the Service and its content, and includes the following types of data:

2.1.2.1. Usage data.

The Operator collects information that the User's browser sends whenever the User visits the Service. This usage data may include information such as the computer's IP address, browser type, browser version, the Service page visited by the User, the time and date of the visit, the time spent on these pages, unique device identifiers, and other diagnostic data.

When the User accesses the Service using a mobile device, this usage data may include information such as the type of mobile device used, the unique mobile device ID, the IP address of the mobile device, the mobile operating system, the type of mobile Internet browser used, unique device IDs, and other diagnostic data.

2.1.2.2. Cookies and tracking data.

The Operator uses cookies and similar tracking technologies to track activity in the Service and store certain information. Cookies are files with a small amount of data that may contain an anonymous unique identifier. Cookies are sent to the User's browser from the Service and stored on their device. Tracking technologies also use tags and scripts to collect and track information,

as well as to improve and analyze the Service. The User can instruct their browser to reject all cookies or specify where they are sent. However, if the User does not accept cookies, they will not be able to use certain parts of the Service. Examples of Cookies that are used:

2.1.2.2.1. Session Cookies. The Operator uses Session Cookies to operate of the Service;

2.1.2.2.2. Preference Cookies. The Operator uses Preference Cookies to remember the User's preferences and various settings;

2.1.2.2.3. Security Cookies. The Operator uses Security Cookies for security purposes;

2.1.2.2.4. Advertising Cookies. Advertising Cookies are used to serve the User with advertisements that may be relevant to them and their interests.

### **3. Principles and conditions of personal data processing**

3.1. Principles of personal data processing.

Personal data is processed by the Operator on the basis of the following principles:

3.1.1. legality and fair basis;

3.1.2. restrictions on the processing of personal data to achieve specific, pre-defined and legitimate goals;

3.1.3. preventing the processing of personal data that is incompatible with the purposes of collecting personal data;

3.1.4. preventing the merging of databases containing personal data that are processed for purposes incompatible with each other;

3.1.5. processing only those personal data that meet the purposes of their processing;

3.1.6. compliance of the content and volume of personal data processed with the stated processing goals;

3.1.7. preventing the processing of personal data that is excessive in relation to the stated purposes of their processing;

3.1.8. ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;

3.1.9. destruction or depersonalization of personal data upon achieving the goals of their processing or in case of loss of the need to achieve these goals, if it is impossible to eliminate the Operator's violations of personal data, unless otherwise provided by the Federal Law.

### 3.2. Terms of personal data processing.

The legal grounds for processing personal data are:

3.2.1. The Operator processes the User's personal data only if they are filled in and/or sent by the User independently via special forms located in the Service. By filling out the appropriate forms and/or sending their personal data to the Operator, the User agrees to this Privacy Policy.

3.2.2. The Operator processes depersonalized data about the User if this is allowed in the User's browser settings (saving cookies and using JavaScript technology is enabled).

### 3.3. Confidentiality of personal data.

The Operator and other persons who have obtained access to personal data must not disclose or distribute personal data to third parties without the User's consent, unless otherwise provided by the Federal Law.

### 3.4. Public sources of personal data.

For information purposes, the Operator may create publicly available sources of personal data of Users. The public sources of personal data may include the User's first name, last name, and other personal data provided by the User with the User's consent.

Information about the User must be excluded from publicly available sources of personal data at any time at the request of the User, the authorized body for the protection of the rights of personal data subjects, or by a court decision.

### 3.5. Assignment of personal data processing to another person.

The Operator has the right to entrust the processing of personal data to another person with the consent of the User, unless otherwise provided by the Federal Law, on the basis of a contract concluded with this person. A person who processes personal data on behalf of the Operator must comply with the principles and rules of personal data processing provided for by the Federal Law and this Privacy Policy.

### 3.6. Cross-border transfer of personal data.

The Operator is obliged to make sure that the foreign state to whose territory the transfer of personal data is supposed to be carried out provides adequate protection of the rights of personal data subjects, prior to the start of such transfer.

Cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the rights of personal data subjects may be carried out in the following cases:

3.6.1. the User's consent to cross-border transfer of their personal data;

3.6.2. execution of the agreement to which the User is a party.

3.7. If inaccuracies in personal data are detected, the User can update them independently by sending a notification to the Operator's email address [privacy@mintercoins.com](mailto:privacy@mintercoins.com) marked "Updating personal data".

3.8. The term for processing personal data is unlimited. The User can withdraw their consent to the processing of personal data at any time by sending a notification to the Operator via email to the Operator's email address [privacy@mintercoins.com](mailto:privacy@mintercoins.com) marked "Withdrawal of consent to the processing of personal data".

#### **4. User's rights**

4.1. User's consent to the processing of their personal data.

The User takes the decision on granting their personal data and gives consent to the processing of their freely of their own will and in their interest. Consent to the processing of personal data can be given by the User or their representative in any form that allows to confirm the fact of its receipt, unless otherwise established by the Federal Law.

4.2. User's rights.

The User has the right to receive information from the Operator concerning the processing of their personal data, if such right is not restricted in accordance with Federal laws. The User has the right to request the Operator to clarify their personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as to take legal measures to protect their rights.

The processing of personal data for the purpose of promoting goods, works, and services on the market by making direct contacts with the User (potential consumer) via means of communication, as well as for the purpose of political campaigning, is allowed only with the User's prior consent.

The Operator is obliged to immediately stop processing the User's personal data for the above-mentioned purposes at the User's request.

It is prohibited to make decisions based solely on automated processing of personal data that generate legal consequences for the User or otherwise affect their rights and legitimate interests, except in cases provided for by Federal laws, or if the User agrees.

If the User believes that the Operator processes their personal data in violation of the requirements of the Federal Law or otherwise violates their rights and freedoms, the User has the right to appeal the actions or omissions of the Operator to the authorized body for the protection of the rights of personal data subjects or in court.

The User has the right to protect their rights and legitimate interests, including compensation for damages and (or) compensation for moral damage.

## **5. Ensuring the security of personal data**

5.1. The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to meet the requirements of Federal legislation in the field of personal data protection.

To prevent unauthorized access to personal data, the Operator applies the following organizational and technical measures:

5.1.1. appointment of officials responsible for organizing the processing and protection of personal data;

5.1.2. restriction of the number of persons allowed to process personal data;

5.1.3. familiarizing Users with the requirements of Federal legislation and regulatory documents of the Operator for the processing and protection of personal data;

5.1.4. organization of accounting, storage and handling of media containing information with personal data;

5.1.5. identification of threats to the security of personal data during their processing, formation of threat models based on them;

5.1.6. development of a personal data protection system based on the threat model;

5.1.7. checking the availability and effectiveness of information security tools;

5.1.8. differentiation of Users' access to information resources and hardware and software for information processing;

5.1.9. registration and accounting of actions of Users of personal data information systems;

- 5.1.10. use of anti-virus and personal data protection system recovery tools;
- 5.1.11. use of inter-network shielding, intrusion detection, security analysis, and cryptographic protection of information when necessary;
- 5.1.12. organization of access to the Operator's territory, protection of premises with technical means of personal data processing.

## **6. Service providers**

6.1. The Operator may hire third-party companies and individuals to facilitate the Service, provide services on behalf of the Operator, perform service-related services, or assist the Operator in analyzing how the Service is used.

6.2. These third parties have access to the User's personal data only to perform these tasks on behalf of the Operator and are obligated not to disclose or use it for any other purpose.

## **7. Analytics**

The Operator may use third-party service providers to monitor and analyze the use of the Service.

### **7.1. Google Analytics.**

Google Analytics is a web analytics service offered by Google that tracks and reports traffic to the Service.

This data is transmitted to other Google services. Google may use the collected data to serve personalized ads on its own advertising network. For more information about Google's privacy policy, please visit <https://policies.google.com/privacy?hl=en>.

### **7.2. Yandex.Metrica.**

Yandex.Metrica is a web analytics service offered by Yandex that tracks and reports traffic to the Service.

For more information about the terms of use of the Yandex.Metrica, visit the page [https://yandex.ru/legal/metrica\\_termsfuse/](https://yandex.ru/legal/metrica_termsfuse/).

## **8. Links to third-party sites or services**

The Service may contain links to other sites or services that are not managed by the Operator. If the User clicks on a third-party link, they will be redirected to a third-party site or service. The



Operator strongly recommends that the User read the policy regarding the processing of personal data on each site or service that they visit. The Operator does not control and is not responsible for the content, privacy of personal data or the operation of any third-party sites or services.

## **9. Final provisions**

9.1. The Privacy Policy can be changed or supplemented by the Operator without notifying the User at any time. The new version of the Privacy Policy takes effect from the moment it is published in the Service.

9.2. Continuing to use the Service after making changes and/or additions to the Privacy Policy means that the User accepts and agrees to such changes and/or additions.

9.3. Other rights and obligations of the Operator in connection with the processing of personal data are determined by the legislation of the Russian Federation in the field of personal data.

9.4. The User can get any clarifications on issues of interest related to the processing of their personal data by contacting the Operator via email [privacy@mintercoins.com](mailto:privacy@mintercoins.com).