



PRIVACY POLICY

The purpose of the present Privacy Policy (the “**Privacy Policy**”) is to provide information on the collection, process and security of any data transmitted to and collected by Naxex Ltd. (“**Naxex**” or the “**Company**” or “**our**” or “**us**”) within the scope of its services, as well as where any personal data is supplied to us through the present website (hereinafter called the “**Website**”) as per our legal obligations under the applicable data protection law. We are committed to taking all reasonable steps in protecting any personal data we receive and collect from you, from misuse, loss or unauthorised access.

What information we collect

This Privacy Policy applies to the personal data collected by us in general or to any person or entity who contacts us through our Website.

We collect a limited amount of data from our Website Visitors, who visit the Website in order to view any information with regards to the liquidity services offered by the Company and/or any other relevant information of the Company that can be found on the Website, which we use to help us to improve your experience during the use of our Website.

The personal data you provide to us when contacting us through the Website includes inter alia your first and last name, your email address, phone number, your IP address, a unique identifier for your computer or other access devices, company information and alike. We also maintain personal data as a result of your website usage, that is information on the frequency which you access our website and how you use the Website. In general personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We also record and monitor communications with you for our internal compliance requirements.

How we use your personal data

Most commonly we will use your personal data to help us manage the services we provide; to communicate with you about any queries you submit or resolve any issues that may arise through the provision of our services; and to ensure that we are correctly recording user traffic which you direct and in general for any other administrative, customer and technical support matter that may be needed.

We may disclose your personal data to any of our group companies, to any third party to whom we assign any of our rights or obligations; and/or to any government, regulatory agency, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

Security

Personal data is processed in a manner that ensures appropriate security and confidentiality, including preventing unauthorised access to or use of personal data. We shall protect all data from loss, misuse, unauthorised access or disclosure, alteration, or destruction. The Company shall not be liable for unlawful or unauthorised use of any personal information due to misuse or misplacement of the passwords, negligent or malicious use.



We maintain policies and procedures and have measures in place in order to ensure high levels of protection of personal data which include, inter alia, appropriate restrictions on permissions of access to personal information, controls and monitoring of storing and distribution of data.

All our employees and associates are required to follow our privacy and security policies and procedures. The Company is not responsible for the security and privacy of any third party and/or Social Networking services or any information collected by them.

How long we keep your personal data

We retain personal information for as long as we reasonably require it for legal or business purposes. In determining data retention periods, we take into consideration local applicable laws and contractual obligations. When information is no longer needed, we proceed with destruction procedures.

Rights

Note that under data protection laws, in certain circumstances you have the below rights in relation to your personal data:

Right to access your personal data. You may request from us to receive a copy of the personal data we hold about you and check that we are lawfully processing it. The Company hereby reserves its right to charge a relevant fee for providing such record of personal data to the person requesting this, except where this is not allowed under local legislation.

Right to correction of the personal data in our records. You may request us to correct any incomplete or inaccurate data we hold about you, though we may need to verify the accuracy of the new data you provide to us.

Right to erasure of your personal data. You have the right to request that we erase or remove your personal data in certain circumstances. This applies where there is no good reason for us continuing to process it, or where you have successfully exercised your right to object to processing (as per below), or where you believe 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.

Right to object to the processing of your personal data. Where we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object.

Right to request restriction of processing of your personal data. You have the right to request that we restrict and/or suspend our processing of your personal data in certain circumstances: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you prefer us to restrict our processing of it rather than erasing 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.

Right to request the transfer of your personal data to you or to a third party. Upon your request we can provide you with your personal data or provide these to a third party you have chosen.



Right to withdraw consent at any time. Where we have obtained your consent to process your personal data, you may withdraw your consent at any time. Note that this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Acceptance of the Privacy Policy

By using the Website, you consent to the collection and processing of your personal data and also agreeing to all such terms and conditions provided for in this Privacy Policy as well as other information found in this Website. You, therefore, agree to waive all rights to holding the Company liable for any claim arising out of, or in connection with the processing of your data, as mentioned herein, unless such data has been fraudulently or negligently processed, as against the terms laid down in this Privacy Policy and you further warrant that all personal data and information provided by you is accurate and up-to-date.

By accepting our Privacy Policy, you are, accepting the data processing and collecting provisions set forth herein and you are giving your consent to the processing of your personal data as set forth in this Privacy Policy.

Amendments to the Privacy Policy

The Company is entitled to modify the present Privacy Policy in its sole discretion. This Privacy Policy may be amended from time to time and you may refer to our page regularly to stay up to date.

Contact Us

Should you have any queries in relation to this Privacy Policy, your personal data held by us, or any other general questions in relation to the Company or the services it provides, do not hesitate to contact us through the contact details provided on this Website.

This Privacy Policy was last updated on February 2021.