

## **PRIVACY POLICY**

Sincere Systems asks you to read thoroughly this Policy. When we use "We", "Sincere Systems" in the text of this Policy we mean Sincere Systems LTD, a company registered in 71-75 Shelton Street, London, Greater London, United Kingdom, WC2H 9JQ, registration number 12269053, which is the developer and the owner of the different products and services under the brand "Sincere Systems", including but not limited to Sincere Systems platform, bot, website and software in general (hereinafter collectively referred to as the "Sincere Systems").

Sincere Systems is the controller of the personal data of the users of the Sincere Systems (hereinafter referred to as the "Clients"). The controller of the personal data is the person or entity who determines the purposes and means of the processing of personal data.

We have prepared this new Policy, taking into account the latest changes in the legislation regulating the protection of personal data, in particular, taking into account the requirements of the General Data Protection Regulation (GDPR).

Sincere Systems is committed to transparency in the collection and use of your personal information. We recognize the right of all our Clients for confidentiality. Protection of personal data of our Clients is our top priority.

This Policy sets forth a description of how we collect, store, use and protect personal information, and the circumstances under which we may share this information. This Policy also describes your data protection rights, including your right to object to some of the processing which Sincere Systems carries out. More information about your data protection rights and how to exercise them is set out below. This Policy applies to all visitors to the Sincere Systems's official website, located at <https://s-group.io> (the "Website").

### **DATA COLLECTION**

You are not obliged to provide us any personal data that we might need, but your refusal to provide personal information necessary, which is for us, might be the reason why we will not be able to provide you all Sincere Systems entirely, such as opening of User Account, virtual currency exchange and wallet services, participation in a bonus program and technical support.

On our part, we state that we will not sell your personal data and will use your personal data in accordance with the requirements of this Policy and for the purposes specified herein.

The following information will be collected from you when you use our services through the following:

**Registration and Verification:** While registering on our Website to establish a User Account, we will request for the necessary personal data to avail the services requested. Such personal data may include; name, website, telephone number, address, electronic mail address, business registration/incorporation certificates, utility bill, location/IP address, identity card, payment details. We may as well request for additional personal data as you use our services.

**Third Party Sources:** Depending on the nature of the services provided by us to our partners or suppliers, we may receive personal data either from you directly or from our partner or supplier who provides us with the personal data to fulfill a service to you on their behalf.

**Customer Support:** When interacting with our customer service, you may be asked to provide us with additional personal data.

## **LEGAL GROUNDS**

Sincere Systems collects and processes your data based on the following legal grounds:

1. **Existence of a contract between the Client and Sincere Systems:** By creating a User Account and using Sincere Systems, you and Sincere Systems conclude a contract for the provision of services. In order to provide you with Services as a whole, as well as with a separate component, we must collect and process certain data about you.
2. **Legitimate interest:** Sincere Systems uses a legitimate interest in processing your data, for example, when Sincere Systems processes your data to fix bugs in the Sincere Systems and to ensure its smooth operation, to improve the work of the Sincere Systems, to develop and to introduce new functions and services, to ensure security of Clients when using the Sincere Systems, and to ensure secure work of the Sincere Systems, to transfer data within the organizational structure of Sincere Systems, for example, to affiliated companies, to transfer certain information at the request of the intellectual property rights holders who claim that a particular Client has placed illegal content. We will not use legitimate interest as a basis for processing of the Client data if the rights, freedoms and interests of the Client override the interest of Sincere Systems or third party.

3. Legislative requirements: Sincere Systems may process Client's data, if it is required by the law that applies to Sincere Systems. For example, Sincere Systems may provide data on Clients at the request of courts or other authorized bodies.

4. Consent: Sincere Systems relies solely on your consent when uses personal data for the purpose of opening and activation of User Account, providing virtual currency exchange and wallet services, participation in a bonus program, technical support, marketing, notification and promotional mailing, or for other purposes for which a specific Client's consent must be granted.

## **USE OF PERSONAL DATA**

Personal information obtained from you can be used by Sincere Systems only to the extent necessary in order for opening, activation and further maintenance of a User Account, providing virtual currency exchange and wallet services, participation in a bonus program and technical support and communication with you regarding the status of your account, verification of your identity and further cooperation, to process any of your transactions, personalize your experience, analyze usage Sincere Systems by the Clients, or help with any service the Client requests.

Sincere Systems may provide references or links to other websites ("External Websites"), which Sincere Systems does not control. External Websites have separate and independent privacy policies. Clients are encouraged to review the policies, rules, terms, and regulations of each site that they visit.

In case of User Account deactivation, Sincere Systems keeps information about you in secret except for cases when disclosure is required in accordance with regulatory requirements, to prevent fraud, and when it use it to contact you from time to time to inform you about the possibility to re-open your User Account and take advantage of attractive offers.

## **SECURITY OF YOUR PERSONAL INFORMATION**

We have implemented reasonable administrative, technical and physical measures in an effort to safeguard the personal information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. Put please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks may not always be secure, and may be subject to possible loss, interception, or alteration while in transit. Accordingly, Sincere Systems does not assume any liability, without limitation, for any loss or damage you may experience or costs you may incur as a result of any transmissions over the Internet or other publicly accessible networks, containing your personal information. While Sincere Systems will take commercially

reasonable efforts to safeguard the privacy of the information you provide to Sincere Systems and will treat such information in accordance with the Policy contained herein, in no event will the information you provide to Sincere Systems be deemed to be confidential, create any fiduciary obligations for Sincere Systems, or result in any liability for Sincere Systems in the event that such information is accessed by third parties without Sincere Systems` s consent.

Sincere Systems security measures include security feature such as password entry requirement for User Account.

Sincere Systems uses two-tier authentication measures to ensure secure access to your User Account.

Please remember: you are responsible for the security of your User Account number, your Initial Wallet ID and password. We strongly recommend that you do not disclose this information to anyone else.

## **STORAGE OF YOUR PERSONAL INFORMATION**

We store your personal data only when it is necessary for you or Sincere Systems for the purposes indicated in this Policy. If Sincere Systems does not need certain information about you and does not need to store information about you in accordance with the requirements of the law, we will delete it or will store it in anonymized way.

We also keep a record of the fact that you have asked us not to send you direct marketing so that we can respect your request in future.

Please note, if you delete your User Account, some personal data will remain in Sincere Systems` s system in anonymized form, it will be stored in such a way that it will be impossible to identify the Client. This is necessary to give Sincere Systems an opportunity to check whether a Client was previously registered or not. Sincere Systems will use such data only in order to prevent fraud, when a Client who violates the Sincere Systems Terms and Conditions and whose User Account was deleted will attempt to re-register within the Sincere Systems system again. By saving such data, Sincere Systems will rely on its legitimate interest.

## **DISCLOSURE OF PERSONAL INFORMATION**

We do not transfer, sell, rent, trade or otherwise disclose your personal information, except as described in this Policy.

We may transfer or disclose your personal information as follows:

1. **Service Providers:** Your personal information may be disclosed, stored and / or transferred (or otherwise made available) to our affiliates, subsidiaries, third parties who provide services such as identification and background checks, website hosting; to third parties — processors, namely, companies, which help Sincere Systems collect, record, store, analyze, structure and process information or perform other actions according to Sincere Systems instructions; and to exchanges, trading platforms and financial institutions. Abovementioned persons adhere to confidentiality rules with regard to your information to the same extent as Sincere Systems according to this Policy.

2. **Legal and Compliance:** Sincere Systems may share your personal information with law enforcement, data protection authorities, government officials, and other authorities if (i) compelled by subpoena, court order, or other legal procedure, (ii) disclosure is necessary to prevent physical harm or financial loss, (iii) necessary to report suspected illegal activity, or (iv) disclosure is necessary to investigate violations of Clients' obligations or potential violations of law.

3. **Sale of Business:** Your personal information may be provided to third parties in the case of carrying out mergers and acquisitions operations, including for the purpose of determining whether to proceed or continue with such transaction or business relationship.

4. **International Transfer:** The data of the Clients from the EU can be transferred to third countries outside the EU and the European Economic Area. If such data is transferred outside the countries of the EU and the European Economic Area to the third countries, Sincere Systems will use appropriate measures to ensure that such a transfer is legal. The measures might include the standard contract clauses approved by the European Commission.

## **USE OF COOKIES**

Sincere Systems uses cookies. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies are typically stored on your computer's hard drive.

Sincere Systems uses cookies in order to enhance the security of your operations on the Platform, evaluate the effectiveness of its Services, analyze trends, work of referral links, and administer the Sincere Systems platform.

Cookies used by Sincere Systems do not contain personal information, nor User Account or password data. With their help, the Website can determine that a request to view the page comes from a person who has already performed the entry.

In order to mark viewed pages, so-called “pixel tags” (also known as “clear gifs” or “web beacons”) are used. Information gathered by advertising companies with the help of “pixel tags” does not enable to establish identity.

The information collected from cookies allows Sincere Systems to determine such things as which parts of the website are most visited and difficulties our Clients may experience in accessing our site. With this knowledge, Sincere Systems can improve the quality of Clients’ experience on the Sincere Systems platform by recognizing and delivering more of the most desired features and information, as well as by resolving access difficulties.

## **RIGHT TO ACCESS TO PERSONAL DATA**

If you want to find out an exhaustive list of data, which Sincere Systems has about you, you may use your right to access information about yourself. To exercise this right, please send a request to the following email address: [support@s-group.io](mailto:support@s-group.io). Sincere Systems may ask you to carry out additional verification procedures to ensure that the information is provided to the right Client. Sincere Systems responds to such requests for free, but a Client abuse can lead to the fact that Sincere Systems will refuse to process the request or will ask such a Client to pay a fee.

## **RIGHT TO WITHDRAW YOUR CONSENT**

If Sincere Systems asks you to give the consent, you can always withdraw your consent to processing personal data by changing the appropriate settings. By withdrawing your consent to processing data, you still have an access to the Sincere Systems, but some functions or components may not be available to you.

In case you do not want that Sincere Systems processed your data for any purpose, you can always easily delete your User Account and in this case, please, contact us for the returning of funds.

Please note, if you delete your User Account, some personal data will remain in Sincere Systems’s system in anonymized form, it will be stored in such a way that it will be impossible to identify the Client. This is necessary to give Sincere Systems an opportunity to check whether a Client was previously registered or not. Sincere Systems will use such data only in order to prevent fraud, when a Client who violates the Sincere Systems Terms and Conditions and whose User Account was deleted

will attempt to re-register within the Sincere Systems system again. By saving such data, Sincere Systems will rely on its legitimate interest.

You can revoke consent and/or request deletion of your personal data by the way of contacting us by E-mail at: [support@s-group.io](mailto:support@s-group.io).

## **THE RIGHT TO DATA PORTABILITY**

You have the right to send data, which Sincere Systems collects about you based on your consent and on the contract that exists between you and Sincere Systems, to another organization. Sincere Systems can independently transmit such data to another organization according to your instructions, but only if Sincere Systems has a technical ability to do so. To exercise this right, please send a request to the following email address: [support@s-group.io](mailto:support@s-group.io). Sincere Systems may ask you to carry out additional verification procedures to make sure that the data is provided to the right Client. Sincere Systems responds to such requests for free, but a Client abuse can lead to the fact that Sincere Systems will refuse to process the request or will ask such a Client to pay a fee.

## **THE RIGHT TO DATA CORRECTION**

You have the right to change your personal data if data, that Sincere Systems has at its disposal, are outdated or inaccurate. You can change your profile information in your User Account settings. In case you have difficulties in changing your information, please contact us at [support@s-group.io](mailto:support@s-group.io).

## **THE RIGHT TO BE FORGOTTEN**

In certain cases, i.e., if you withdraw your prior consent or if you object to processing of your personal data based on legitimate interest, and we do not have any interest that prevails over your rights, freedoms and interests, you have the right to ask us to remove the data that we have about you. To exercise this right, please contact us at the following email address: [support@s-group.io](mailto:support@s-group.io). Sincere Systems may ask you to perform additional verification procedures to make sure that the appropriate Client has contacted it. There are certain cases in which the above described right cannot be exercised. We will inform you if they occur.

Please note if you will execute your right to be forgotten and delete your User Account, some personal data will remain in Sincere Systems's system in anonymized form, it will be stored in such a way that it will be impossible to identify the Client. This is necessary to give Sincere Systems an opportunity to check whether a Client was previously registered or not. Sincere Systems will use such data only in order to prevent fraud, when a Client who violates the Sincere Systems Terms and Conditions and whose User Account was deleted will attempt to

re-register within the Sincere Systems system again. By saving such data, Sincere Systems will rely on its legitimate interest.

## **SUBMITTING A REQUEST**

Sincere Systems will process your request and will respond to it within 7 business days from the receipt of the corresponding request from you. In some cases, this period may be extended by two months. This might occur, for example, for technical reasons or because of a big inflow of requests. You will be notified of such extension and the reasons for it within 7 business days from the receipt of your request.

Sincere Systems accepts and processes the requests for personal data free of charge. However, if there are reasons for Sincere Systems to believe that requests are sent unfairly, we reserve the right to refuse processing such requests or to establish a reasonable fee for such processing.

## **CHANGES TO THE POLICY**

In the event of changes made to this Policy, the modified version will be immediately published on the Website. You should regularly review this Policy. If the changes in this Policy are significant, we will do our best to inform you about the changes and to make such changes clearly introduced to you. If changes to this Policy are not significant, we will notify you of such changes by posting the updated Policy on our Website.

## **CONTACT US**

You understand and agree that all communication with you will be via email. Please contact us if:

- you have any questions, inquiries or comments about this Policy;
- you wish to access, update, and/or correct inaccuracies in your personal information; or
- you otherwise have a question or complaint about the manner in which we or our service providers treat your personal information.

You may contact us by E-mail at [support@s-group.io](mailto:support@s-group.io).

## **MISCELLANEOUS**

This Privacy Policy comes into force on June 1, 2019.