

## PRIVACY POLICY Asteria GRP LLC

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Your personal data by **Asteria GRP LLC**, registration number: 1073325, with registered office at 22 Boulevard Plaza Tower 2, Dubai, United Arab Emirates (hereinafter referred to as the "**Operator**"), which occurs on the website <https://myasteria.com> and on the Operator's profiles on social networks and in the provision of services and organization of events by the Operator.

**Through this Policy, the Controller provides you with information about why your personal data is processed, how it is processed, how long the Controller stores it, what your rights are in relation to the processing of your personal data and other relevant information about the processing of your personal data.** Through this Policy, the Controller fulfils its information obligation towards all data subjects both if the Controller has obtained personal data directly from you as a data subject and if the Controller has obtained your personal data from another source.

The Controller processes your personal data in accordance with Regulation 2016/679 of the European Parliament and of the Council of the European Union on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the "**Regulation**"), Act No. 18/2018 Coll. on the protection of personal data and on amendments and supplements to certain acts (hereinafter referred to as the "**Act**"), or other regulations on the protection of personal data (hereinafter referred to as the "**Data Protection Regulations**").

The protection of your personal data is one of our priorities, which is why we transparently inform you about the processing of personal data in this document, as well as about **your rights that you** can exercise as a data subject against the Data Controller. At the same time, in this Notice you will find information about the specific purposes for which we process personal data, which of your personal data or what types of personal data we process, on what legal basis, to whom we provide your personal data, etc.

You may contact the Data Controller in matters relating to the processing and protection of personal data at **Asteria GRP LLC**, 22 Boulevard Plaza Tower 2, Dubai, United Arab Emirates or by email to **info@myasteria.com**. The Controller has not designated a data controller in the area of data processing and protection.

### 1. CATEGORIES OF PERSONAL DATA

The controller processes your personal data **in accordance with the principle of minimisation** so that it can fulfil the concluded contracts, legal obligations, process personal data for which it has a legitimate interest or process your personal data for which you have given your consent. The controller shall only ever process personal data to the extent necessary to fulfil the intended purpose of the processing. This means that the Controller does not request personal data from you that is not necessary for the specific purpose of the processing.

**The specific categories of personal data that the Data Controller processes about you for the individual purposes of processing are specified below in the table of purposes.**

### 2. SOURCE OF PERSONAL DATA

**The Controller obtains your personal data directly from you as a data subject when you provide it to the Controller** (e.g. when concluding a contract - registering on the Controller's website, when identifying and verifying your identity in accordance with the regulations on protection against money laundering or when visiting the Controller's website).

**In some cases**, in particular where **a commercial company or other entity of which you are an agent or contact person** enters into a contract with the Controller, it is this entity that is the source

of your personal data.

### 3. PURPOSES, LEGAL BASIS FOR PROCESSING AND RETENTION PERIOD

The controller shall only process your personal data for justified purposes, for a limited period of time and using the maximum possible level of security. **The controller shall only process personal data if there is a legal basis for processing it and it is therefore processed in accordance with the principle of lawfulness.** The controller shall always store personal data in accordance with the principle of minimisation. This means that he/she processes personal data only for as long as it is necessary to keep the personal data. After this period, the Data Controller shall delete the personal data, unless otherwise provided for by law.

Please see **the table below** for the specific purposes of processing, the legal bases and the retention period of your personal data depending on the specific purpose of processing. The Data Controller will also provide you with more information about the retention period of your personal data if you request it.

Purposes of	Legal basis	Categories of personal data	Categories of the persons concerned	Retention period
<b>Processing of accounting documents</b>	Article 6(1)(c) of the Regulation - the processing of personal data is carried out in the performance of legal obligations (Act No. 431/2002 Coll. on Accounting, as amended, Act No. 595/2003 Coll. on Income Tax, as amended, Act No. 222/2004 Coll. on Value Added Tax, as amended)	natural persons - suppliers of goods and services and their representatives, intermediaries, staff and representatives suppliers of goods and services, natural persons - clients and their representatives	routine personal data necessary for the performance of legal obligations (name, surname, address of residence / place of business, address of service delivery, contact details - phone number, email address, bank connection)	10 years following the year to which they relate
<b>Conclusion of contracts and fulfilment of contractual obligations of the controller on the basis of contracts concluded with suppliers of goods and services</b>	Article 6(1)(b) of the Regulation - the processing of personal data is carried out in the performance of contractual obligations	natural persons - business partners and their representatives, natural persons - suppliers of services and their representatives, natural persons - representatives of business partners (PO)	common personal data (in particular name, surname, address of place of business, billing address, telephone number, e-mail)	during the duration of the contractual relationship and after its termination until full Settlements legal and other claims resulting from concluded contracts

<p><b>Conclusion of contracts and fulfilment of contractual obligations of the controller on the basis of contracts concluded with registered by users - clients on the website of the operator <a href="http://myasteria.com">myasteria.com</a> (including pre-contractual relations) - contracts for the provision of various services in the field of cryptocurrencies</b></p>	<p>Article 6(1)(b) of the Regulation - the processing of personal data is carried out in the performance of contractual obligations</p>	<p>natural persons - clients and their representatives</p>	<p>common personal data necessary for the conclusion of the contract - registration: first name, last name, e-mail address, country of origin, password, additional payment data: payment details, virtual wallet, purchase history data, data on the amount and structure of the portfolio registered user - customer</p>	<p>during the duration of the contractual relationship and after its termination until full Settlements legal and other claims resulting from concluded contracts</p>
<p><b>Maintenance of registered accounts users - clients on the website of the operator <a href="http://myasteria.com">myasteria.com</a></b></p>	<p>Article 6(1)(b) of the Regulation - the processing of personal data is carried out in the performance of contractual obligations</p>	<p>natural persons - clients and their representatives</p>	<p>common personal data necessary for the conclusion of the contract - registration: first name, last name, e-mail address, country of origin, password, additional payment data: payment details, virtual wallet, purchase history data, data on the amount and structure of the portfolio registered user - customer</p>	<p>for the duration of the active account and for 15 months after the last login or until full settlement legal and other claims resulting from the concluded contract</p>

<p><b>Conclusion and execution of marketing contracts concluded on the <a href="http://myasteria.com">myasteria.com</a> website</b></p>	<p>Article 6(1)(b) of the Regulation - the processing of personal data is carried out in the performance of contractual obligations</p>	<p>natural persons - clients and their representatives</p>	<p>common personal data necessary for the conclusion of the contract - registration: first name, last name, e-mail address, country of origin, password, additional payment data: payment details, virtual wallet, purchase history data, data on the amount and structure of the portfolio registered user - customer, marketer network data - affiliate</p>	<p>during the duration of the contractual relationship and after its termination until full Settlements legal and other claims resulting from concluded contracts</p>
<p><b>Fulfilling legal obligations related to the conclusion of a distance contract</b></p>	<p>Article 6(1)(c) of the Regulation - the processing of personal data is carried out in the performance of legal obligations (Act No. 102/2014 Coll. on consumer protection in the sale of goods or provision of services under a distance or off-premises contract premises of the seller and on amendment and supplementation of certain laws)</p>	<p>natural persons - clients (consumers) and their representatives</p>	<p>common personal data</p>	<p>during the duration of the distance contract and until full settlement legal and other claims arising from a distance contract</p>
<p><b>Provision of free educational services through online webinars</b></p>	<p>Article 6(1)(b) of the Regulation - the processing of personal data is carried out in the performance of contractual obligations</p>	<p>natural persons - clients</p>	<p>e-mail address, name, surname</p>	<p>during the duration of the distance contract and until full settlement legal and other claims arising from a distance contract</p>

<p><b>Keeping records of suppliers, other business partners and clients and their contact persons (in the case of business partners or clients of legal entities), contracts concluded and maintaining appropriate communication</b></p>	<p>Article 6(1)(f) of the Regulation - the processing of personal data is carried out on the basis of the legitimate interest of the Controller, which is the need to keep track of suppliers, business partners and clients of the controller, or their contact persons in contractual relations for the proper performance of contractual obligations, possible proof of legal claims and conducting appropriate contractual communications</p>	<p>natural persons - suppliers of goods and services, their employees and agents, intermediaries, natural persons - clients and representatives</p>	<p>common personal data (first name, last name, business name, address of residence / place of business, contact details - phone number, email address, affiliation to an organisation)</p>	<p>5 years after termination of the contractual relationship</p>
<p><b>Handling complaints and maintaining the prescribed documentation in the area of complaints</b></p>	<p>Article 6(1)(c) of the Regulation - the processing of personal data is carried out in the performance of legal obligations (Act No. 250/2007 Coll. on Consumer Protection and on Amendments to Act No. 372/1990 Coll. of the Slovak National Council on Offences, as amended, Act No. 40/1964 Coll. on the Civil Code, as amended)</p>	<p>natural persons making a claim (clients, their employees and representatives)</p>	<p>common personal data</p>	<p>3 years from the date of application claims, if the claim is made by a natural person client and 4 years from the date of the claim claims, if the claim is made by a client-legal entity</p>

<p><b>Fulfillment of obligations in the exercise of due diligence on the client and in the detection of unusual business transactions in payment transactions (identification of the client and the business transaction, including copying and scanning of official documents and data retention) - identification of the client to carry out online transactions and fulfillment of other obligations in the field of protection against money laundering as a person liable for the protection of the proceeds of crime (KYC).</b></p>	<p>Article 6(1)(c) of the Regulation - the processing of personal data is carried out in the performance of legal obligations (Act No. 297/2008 Coll. on protection against money laundering and on protection against financing terrorism and on amendment and supplementation of certain acts as amended, Act No. 492/2009 Coll. on payment services and on amendment and supplementation of certain acts, as amended)</p>	<p>natural persons - clients and their representatives, end users of client benefits</p>	<p>first name, surname, date of birth, birth number, permanent or other residence address, nationality, type and number of identity document, other personal data proving the status of the ACI or the function of the data subject with the client</p>	<p>5 years from the end of the contractual relationship with the client, if the financial intelligence the unit does not request in writing for longer retention (not more than another 5 years) in accordance with § 19 of Act No. 297/2008 Coll. on the protection against money laundering and the protection against financing terrorism and on amendment and supplementation of certain laws as amended</p>
<p><b>Retention of all written documents and data relating to the execution of a trade in the course of business activities as an AML obliged person (when executing payment transactions)</b></p>	<p>Article 6(1)(c) of the Regulation - the processing of personal data is carried out in the performance of legal obligations (Act No. 297/2008 Coll. on protection against money laundering and on protection against financing terrorism and on amendment and supplementation of certain laws as amended)</p>	<p>natural persons - clients and their representatives, end users of client benefits</p>	<p>first name, surname, date of birth, birth number, address of permanent or other residence, nationality, type and number of identity document, other personal data stated in the documents on trade</p>	<p>5 years from the execution of the trade, if the financial intelligence the unit does not request in writing for longer retention (not more than another 5 years) in accordance with § 19 of Act No. 297/2008 Coll. on the protection against money laundering and the protection against financing terrorism and on amendment and supplementation of certain laws as amended</p>
<p><b>Handling of exercised rights of data subjects</b></p>	<p>Article 6(1)(c) of the Regulation - the processing of personal data is carried out in the performance of legal obligations (Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Additions to Certain Acts)</p>	<p>natural persons who have made an application or exercised data subjects' rights to the transferor</p>	<p>common personal data included in the application</p>	<p>until the rights asserted have been settled</p>

<p><b>Records of exercised rights of data subjects</b></p>	<p>Article 6(1)(f) of the Regulation - the processing of personal data is carried out on the basis of the legitimate interest of the Controller, which is to record the rights exercised by data subjects in order to demonstrate compliance with obligations under the legislation</p>	<p>natural persons who have made an application or exercised data subjects' rights to the transferor</p>	<p>common personal data included in the application</p>	<p>5 years from the date of exercise of rights</p>
<p><b>Sending information and news about cryptocurrency news and services of the operator (newsletter) - direct marketing</b></p>	<p>Article 6(1)(a) of the Regulation - processing of personal data is carried out on the basis of the data subject's consent</p>	<p>natural persons who have subscribed to the newsletter</p>	<p>name, surname, e mail address</p>	<p>3 years from the date of consent or until the consent is withdrawn, whichever is the earlier</p>
<p><b>Sending information and news about cryptocurrency news and services of the operator (direct marketing to existing and former clients)</b></p>	<p>Article 6(1)(f) of the Regulation - processing is carried out on the basis of legitimate interest operator, who is interested in retaining existing clientele and informing them of the operator's current services</p>	<p>natural persons - clients and representatives of clients and entities to whom the controller has provided services in the past</p>	<p>name, surname, function in the client's company, e-mail address</p>	<p>3 years from the date of provision of the services or until unsubscription, whichever is earlier</p>

<p><b>Responding to messages and handling queries/requests from messages received to the operator via contact forms on the website, social media profiles, by email or by phone</b></p>	<p>Article 6(1)(f) of the Regulation - the processing of personal data is carried out on the basis of the legitimate interest of the controller, which is responding to messages on social networks and received in any other form for the proper conduct of business Communications, improving the quality of services provided and attracting new clientele</p>	<p>natural persons sending a message / enquiry</p>	<p>e-mail address, other data specified in the message</p>	<p>30 days from the date of receipt of the request or until the request is processed (purpose fulfilled), whichever is sooner</p>
<p><b>Publication of client testimonials about their satisfaction with the operator's services on the website</b></p>	<p>Article 6(1)(a) of the Regulation - processing of personal data is carried out on the basis of the data subject's consent</p>	<p>natural persons - clients who have given their consent</p>	<p>name, photo, age, occupation</p>	<p>3 years following the consent or until it is withdrawn, whichever is the earlier</p>
<p><b>Taking photographs of the Data Subject and publishing them, together with the name, surname, function and contact details of the Data Subject on the website of the Operator, on the website of business partners and on the profile of the Operator on social networks</b></p>	<p>Article 6(1)(a) of the Regulation - processing of personal data is carried out on the basis of the data subject's consent</p>	<p>natural persons who have given their consent</p>	<p>name, surname, function of the data subject, contact details, photograph</p>	<p>3 years from the date of consent or until its revocation, whichever is the earlier</p>
<p><b>Making audiovisual recordings of the Data Subject and their publication, together with the name, surname, function and contact details of the Data Subject, on the Controller's website, on the website of business partners and on the Controller's profile on social networks</b></p>	<p>Article 6(1)(a) of the Regulation - processing of personal data is carried out on the basis of the data subject's consent</p>	<p>natural persons who have given their consent</p>	<p>name, surname, function audio-visual record of the person concerned</p>	<p>3 years from the date of consent or until its revocation, whichever is the earlier</p>



<b>Organising competitions for the public and publishing the winners on the website and on the operator's social media profiles</b>	Article 6(1)(a) of the Regulation - processing of personal data is carried out on the basis of the data subject's consent	natural persons who have entered the competition	name, surname, address of residence	2 years from the date of consent or until its revocation, whichever is the earlier
<b>Measuring website traffic and targeting the operator's advertising through use of cookies</b>	Article 6(1)(a) of the Regulation - processing of personal data is carried out on the basis of the data subject's consent	natural persons - visitors to the website who have given their consent	common personal data	not more than 2 years following the year to which they relate

In connection with the security of personal data, the Controller has adopted relevant internal documentation specifying the appropriate security measures adopted by the Controller for the purpose of securing your personal data (in particular, physical, technical and organisational security measures, e.g. password-protected directories and databases or the use of SSL encryption technologies).

#### 4. JOINT OPERATORS

For the purposes of processing your personal data "**Performance of obligations in the exercise of care towards the client and in the detection of an unusual business operation (identification of the client and the business operation, including copying and scanning of official documents and data storage) - identification of the client to carry out online transactions and the fulfilment of other obligations in the field of protection against money laundering as an obliged person (KYC)**", the means and purposes of processing personal data of the data subjects are determined, in addition to the Data Controller, by UPDN ONE s.r.o., Bohdalecká 1420/6, Michle, 101 00 Praha 10, Czech Republic, ID No.: 026 54 962, which, when processing personal data for the aforementioned purpose, processes the personal data of data subjects in the capacity of joint controllers together with the Controller (hereinafter referred to as "**Joint Controllers**").

The Joint Controllers have determined their mutual responsibilities for compliance with their obligations under the Data Protection Regulations in the Joint Controllers' Agreement entered into pursuant to Article 26 of the Regulation, pursuant to which:

- The tasks of the contact point for data subjects in relation to the processing of personal data are performed by the Controller,
- The obligations to provide the information referred to in Articles 13 and 14 of the Regulation to data subjects shall be fulfilled by the Controller,
- The duties and tasks related to the exercise of the rights of data subjects shall be performed by the Controller, in accordance with the procedure set out in Article 6 of this Privacy Policy.

Notwithstanding the foregoing portions of the Joint Controllers Agreement, each Data Subject shall be entitled to exercise his or her rights under the Privacy Regulations with and against each of the Joint Controllers.

## 5. DOES THE CONTROLLER USE PROFILING AND AUTOMATED DECISION-MAKING?

The controller does not use profiling when processing your personal data and does not process personal data in any form of automated individual decision-making, which would lead to the evaluation of your personal aspects.

## 6. RECIPIENTS

Your personal data may be disclosed to recipients - government authorities, courts, law enforcement authorities, supervisory authorities in the field of protection against money laundering, consumer protection or payment services, which are entitled to process your personal data in certain cases.

In some cases, we also provide your personal data to other entities, in particular to third parties who are joint controllers in accordance with the previous article, to UPDN ONE s.r.o. and to our processors with whom we have concluded contracts of entrustment for the processing of personal data and we keep a transparent list of all our processors. Our processors include: **web development service companies, website management companies** (including hosting services and advertising and marketing services), **a newsletter company, an accounting service company** and **our sales representatives** (natural persons - entrepreneurs) **within the framework of the affiliate program on the website.**

When processing your personal data, we only use processors who have taken appropriate technical and security measures to meet the requirements of the Data Protection Regulations for the secure processing of your personal data.

The recipient of your personal data are also the operators of the social networks and communication media Facebook, INSTAGRAM, Twitter, LinkedIn and Youtube in the event that you contact the Operator via a message on one of the aforementioned social networks or if you give your consent to the publication of your personal data on these social networks and communication channels.

## 7. TRANSFER TO THIRD COUNTRIES AND INTERNATIONAL ORGANISATIONS

In some cases, the processing of your personal data by the Controller involves the transfer of your personal data to third countries:

- if you subscribe to the newsletter or if you are sent a client newsletter, your personal data is transferred to SendGrid, a US company that is the operator of the service used by the Operator for the distribution of newsletters,
- if you consent to the storage of analytical and marketing cookies, your personal data will be transferred to the USA, to Google LLC and Facebook, Inc., which are used by the Operator for the purpose of measuring traffic and activity on the Operator's website,
- if you contact the Controller by means of a message on social networks or if you give the Controller your consent to disclose your personal data on social networks or other communication channels (Facebook, INSTAGRAM, Twitter, LinkedIn and Youtube), your personal data will be transferred to the USA, to the companies Facebook Inc., Google, LLC, Twitter, Inc., LinkedIn Corporation, which are the operators of the above-mentioned social networks and communication channels.

The transfer of your personal data is secured in all of the above cases by means of standard contractual clauses which are in accordance with the terms of use

the aforementioned services are part of the contracts of entrustment with the processing of personal data concluded with the entities specified above.

## 8. WHAT ARE YOUR RIGHTS IN RELATION TO THE PROCESSING OF PERSONAL DATA? You

have the following rights as a data subject in relation to the processing of your personal data:

Your right	Description
<p><b>Right of access</b> - As a data subject, you have the right to obtain confirmation from the Data Controller as to whether it is processing your personal data and, if so, to obtain access to that personal data and information pursuant to Article 15 of the Regulation. The Controller will provide you with a copy of the personal data that is being processed. If you make a request by electronic means, the information will be provided to you by the Controller in a commonly used electronic format, unless you request otherwise.</p>	<p><b>Right to erasure ("right to be forgotten")</b> - You also have the right to obtain from the Data Controller the erasure of your personal data without undue delay if certain conditions are met, for example, if the personal data are no longer necessary for the purposes for which they were collected or processed by the Data Controller. However, this right of yours must be considered on a case-by-case basis, as there may be situations where the Controller is prevented from erasing your personal data by other circumstances (for example, a legal obligation of the Controller). This means that in such a case, the Data Controller will not be able to comply with your request to erase your personal data.</p>
<p><b>Right to rectification</b> - To ensure the accuracy, completeness and timeliness of your personal data, the Controller has taken reasonable measures. As a data subject, you have the right to have your inaccurate personal data rectified or your incomplete personal data completed by the Controller without undue delay.</p>	<p><b>Right to restriction of processing</b> - You also have the right to have the Controller restrict the processing of your personal data. This will be the case, for example, if you contest the accuracy of the personal data or if the processing is unlawful and you request the restriction of processing, or if the Controller no longer needs your personal data for the purposes of processing but you need it to prove, exercise or defend legal claims. The Controller will restrict the processing of your personal data if you request it.</p>

<p><b>Right to data portability</b> - In certain circumstances, you have the right to have your personal data transferred to another data controller that you designate. However, the right to portability only applies to personal data that the Data Controller processes on the basis of the consent you have given to the Data Controller, on the basis of a contract to which you are one of the parties or where the Data Controller processes personal data by automated means.</p>	<p><b>RIGHT TO OBJECT</b> - You have the right to object to the processing of your personal data, for example, if the Controller processes your personal data on the basis of a legitimate interest or in the case of processing involving profiling. If you object to such processing of your personal data, the Controller will not further process your personal data unless it demonstrates the necessary legitimate grounds for further processing of your personal data.</p>
<p><b>RIGHT TO WITHDRAW CONSENT</b> - If the Controller processes your personal data on the basis of your consent, you have the right to withdraw the consent at any time in the same way as you gave it. Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal of consent.</p>	<p><b>Right to lodge a complaint or complaint</b> - If you feel that your personal data is being processed in violation of applicable law, you may lodge a complaint with the supervisory authority, which is the <b>Office for Personal Data Protection of the Slovak Republic</b>, located at Hraničná 12, 820 07 Bratislava 27; website: <a href="http://dataprotection.gov.sk">dataprotection.gov.sk</a>, phone number: 02 3231 3214; e-mail: <a href="mailto:statny.dozor@pdp.gov.sk">statny.dozor@pdp.gov.sk</a>.</p>

You can exercise your rights referred to in the preceding paragraph of this Policy by contacting the Operator's contacts listed at the beginning of this Policy.

The answer to the exercise of your rights will be provided to you by the Operator free of charge. In the event of a repeated, unfounded or unreasonable request for the exercise of your rights, the Controller is entitled to charge a reasonable fee for the provision of information. The Controller shall provide you with a reply within 1 month from the date on which you exercised your rights. In certain cases, the Controller is entitled to extend this period, in the event of a high number and complexity of requests from data subjects, but not more than 2 months. The Controller will always inform you of the extension of the time limit.

## 9. SOCIAL MEDIA AND LINKS TO OTHER WEBSITES

As part of the marketing and advertising support, you will find links to various social networks such as Facebook, INSTAGRAM, Twitter, LinkedIn or other online communication channels such as Youtube on the Operator's website. The Operator hereby wishes to inform you that once you click on the add-on on the website and go to the social network or communication channel, the privacy policy of the operator of the social network or communication channel will start to apply, unless you contact the Operator via a message on the social network (in which case the processing of your personal data is also governed by this Policy and your personal data is processed by the Operator in accordance with the information provided above).

For more information on the processing of your personal data by social network operators, please visit the following links: (i) Facebook: <https://sk-sk.facebook.com/policy.php>, (ii) Instagram: <https://sk-sk.facebook.com/help/instagram/155833707900388/>, (iii) LinkedIn:

<https://www.linkedin.com/legal/privacy-policy> (iv) Twitter: <https://twitter.com/en/privacy> and (v) YouTube: <https://policies.google.com/technologies/product-privacy?hl=sk>.

## **10. PAYMENT**

This Policy is valid and effective from 02.09.2024.

As it may be required to update the information on the processing of personal data contained in this Policy in the future, the Controller is entitled to update this Policy at any time. However, in such a case, the Controller will notify you of this in an appropriate manner in advance.