

PRIVACY POLICY

1. INTRODUCTION

- a. This Privacy Policy ("Policy") is a legal agreement between GAGARIN and its affiliates and subsidiaries worldwide ("GAGARIN", "we", "us" or "our", "Platform") and you, an end user of the Services ("you" or "User") in relation to the Services.
- b. This Policy (together with our Terms of Use) explains and sets out the basis for why and when we collect Personal Information about the people who use GAGARIN, how we use it, the conditions under which we may disclose it to others and the measures we take to keep it secure.
- c. By using GAGARIN, you are accepting and consenting to the practices described in this Policy. Please note that this includes consenting to the collection and processing of any Personal Information you provide, as described below. We may amend this Policy from time to time so please check it occasionally to ensure that you agree with any changes. Your continued use of GAGARIN will constitute your acceptance of, and agreement to, any changes.
- d. GAGARIN values privacy and we make a concerted effort to minimize and, to the extent possible, eliminate the exposure of personal data during the use of our interface.
- e. We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).
- f. We do not collect, hold, or store any information relating to your wallet, including private keys, keystore files, passwords, mnemonic phrases.
- g. To the extent we collect any Personal Information, this Policy describes how GAGARIN collects, uses, and shares Personal Information of people who use GAGARIN.
- h. This Policy applies to anyone who accesses GAGARIN. Please read the Policy carefully to understand our practices regarding your information and how we will treat it. By visiting the Platform, and/or using the Platform, you acknowledge that the collection, use, and sharing of your information will take place as described in this Policy.
- i. So that we are clear about the terminology we are using, when we use the phrase "Personal Information" in this Policy, we mean information about an individual that (either by itself or when combined with information from other available sources) allows that individual to be identified, including but not limited, the individual's name, telephone number, or e-mail address.

2. THE BLOCKCHAIN

Due to the inherent transparency of many blockchains, transactions that individuals broadcast via any blockchain may be publicly accessible. This includes, but is not limited to, your public sending address, the public address of the receiver, the amount sent or received, and any other data a user has chosen to include in a given transaction. Information stored on a blockchain may be public, immutable, and difficult or even impossible to remove or delete. Transactions and addresses may reveal information about the user's identity and information can potentially be correlated now or in the future by any party who chooses to do so, including law enforcement. Users are encouraged to review how privacy and transparency on the blockchain works.

3. HOW WE COLLECT INFORMATION

We obtain information about you when you use GAGARIN, when you contact us via email or a web form or if you register to receive one of our regular newsletters. We may collect and process the following types of information about you:

- a. Information you provide us You may provide us with Personal Information by filling in forms on the Platform or by corresponding with us by e-mail or live-chat. The Personal Information you provide may include your name, email, address, phone number, language preference and information regarding the pages you access. By providing us with this information, you expressly consent to our use of your Personal Information in accordance with this Policy.
- b. Information we collect about you When you use Platform, we may automatically collect information about your IP address, information about your visit, browser plug-in types and versions, your browsing activity, time zone setting, how you use Platform, and information about your visit, including the dates and times you use the Platform length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.
- c. Information we receive from other sources We may receive information about you if you use any other services we, or our partners, operate. We also work with third parties (including, contractors, project partners, service providers, analytics providers) and may receive information about you from them. This may be combined with other information you provide to use to collect information about you as described below. We use this information to enhance your experience with the Platform.

4. HOW WE USE INFORMATION

- a. We use the information that we have about you to provide support and certain services to you.
- b. We may use the Personal Information we collect from and about you to:
 - provide you with information or services that you request from us, including to respond to your comments, questions, and/or provide customer service;
 - provide information to you about developments and new products, features, including changes and enhancements to the Platform;
 - monitor and analyze usage and trends and personalize and improve Platform and your experience using Platform;
 - conduct surveys and get feedback from you
 - develop, enhance, and market products and services, and provide products and services to you;
 - meet GAGARIN's legal and regulatory requirements, and
 - for any other purpose with your consent.
- c. We use IP addresses to analyze trends, administer the Platform, track user movements, and gather broad demographic information for aggregate use. For systems administration and detecting usage patterns and troubleshooting purposes, GAGARIN's web servers also automatically log standard access information including browser type, access times/open mail, URL requested, and referral URL. This information is not shared with third parties and is used only within GAGARIN on a need-to-know basis. We reserve the right to block access for any user accessing GAGARIN via a proxy service intending to conceal originating identity.
- d. We review our retention periods for Personal Information on a regular basis. We will hold your Personal Information on our systems for as long as is necessary for the relevant activity.

5. SHARING OF PERSONAL INFORMATION

- a. We will not disclose your Personal Information other than as described below, and we do not and will not sell your Personal Information to anyone.
- b. You agree that we have the right to share the Personal Information we collect from and about you:
 - to fulfill the purpose for which you provided it;
 - with your consent;
 - for legal, protection, and safety purposes;
 - to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
 - to protect the rights of GAGARIN, our agents, customers, and others, including by enforcing our agreements, policies, and terms of service;
 - with third parties, if GAGARIN or substantially all our assets are acquired by a third party, in which case Personal Information held by us about the users will be one of the transferred assets and,
 - with those who need it to do work for us (our service providers, as defined below). Service providers: We may contract with third parties to perform functions related to Platform. In general, service providers will have access to your Personal Information only to the extent needed to perform their business functions but may not use or share that Personal Information for purposes outside the scope of their functions related to Platform.
- c. We reserve the right to share historical wrap and/or unwrap transactions, estimated and actual trade volumes; settlement prices; and other aggregate data and information related to the digital assets available on GAGARIN.

6. LEGAL BASIS FOR PROCESSING

The following legal bases apply to the ways in which we use and share your Personal Information:

- when it is necessary for us to perform pursuant to our contract with you or in your interests;
- in our legitimate interests in ensuring our business is conducted legitimately and to a high standard. Legitimate interests mean the interests of our organization to conduct and manage our business to enable us to better serve you and provide you with a secure experience on GAGARIN;
- generally, we do not rely on consent as a legal basis for processing your Personal Information;
- we will retain the information you provide in order to process your request, provide support, and/or carry out and fulfill our Promotions.

7. OTHER SITES AND LINKS TO OTHER SITES

- a. GAGARIN may contain links to other third-party websites or applications. Once you click on such a link and leave GAGARIN or are redirected to a third-party website or application, you are no longer governed by this Policy. Any information you provide on those sites is subject to that third party's privacy policy and we are not responsible for the privacy and security practices and policies of those third-party sites or applications.
- b. This Policy and the use of your Personal Information only applies to the information you provide. You are cautioned that if you disclose Personal Information or personally sensitive data through the use of the Internet, such as through chat rooms, communities,

bulletin boards, or other public online forums, this information may be collected and used by other persons or companies over which GAGARIN has no control. It is your responsibility to review the privacy statements, policies, terms, and conditions of any person or company to whom you choose to link or with whom you choose to contract. We are not responsible for the privacy statements, policies, terms, conditions, or other content of any Site not owned or managed by us.

8. OUR COMMITMENT TOWARDS CHILDREN'S PRIVACY

We do not direct GAGARIN to, nor do we knowingly collect any Personal Information from children under 18. Children under 18 are not eligible to use GAGARIN. If we learn that someone using GAGARIN is under 18 years of age, we will take steps to remove any Personal Information from our database and to prevent them from utilizing GAGARIN.

9. SECURITY OF YOUR PERSONAL INFORMATION & RIGHTS

- a. We are committed to protecting the security of Personal Information. We have taken certain physical, administrative, and technical steps to help safeguard the information we collect from and about you. While we take steps to help ensure the integrity and security of our network and systems, we cannot guarantee the security of your data transmitted to us over the email or through GAGARIN; any transmission is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorized access
- b. Personal Information and other data may be exported outside of the jurisdiction in which you reside. Your Personal Information may be processed and stored in a foreign country or countries. Under those circumstances, the governments, courts, law enforcement, or regulatory agencies of that country or those countries may be able to obtain access to your Personal Information through foreign laws. You need to be aware that the privacy standards of those countries may be lower than those of the jurisdiction in which you reside.

10. CONTACT US

Any questions regarding this policy and our privacy practices should be sent by email to yuri@gagarin.world.

11. CHANGES TO PRIVACY POLICY

- a. GAGARIN shall be permitted to make amendments to the Policy from time to time. You will be deemed to have accepted such amended Policy by indicating your acceptance on GAGARIN. Any further actions which you make will be subject to the Policy in effect at that time. If you object to any changes, you may stop using GAGARIN. Your continued use of GAGARIN after we publish or otherwise provide notice about our changes to the Policy means that you are consenting to the updated Policy.
- b. We keep this Policy under regular review. This Policy was last updated February 09, 2022.