

Ainomo Data Protection Policy

Effective Starting From: [01.01.2024]

This Data Protection Policy explains how Ainomo DATALAB LTD ("Ainomo") collects, uses, and discloses information about you when you use our website (www.ainomo.com) and online services (the "Services"), and when you interact with us.

We may update this Data Protection Policy over time at our sole discretion. If we make changes, we will notify you by revising the date at the top of this policy and by posting the updated policy on our website. We may also provide additional notice, such as adding a statement to our homepage or sending you an email notification. We encourage you to review this Data Protection Policy whenever you access the Services to stay informed about our practices and the choices available to you.

By accessing and using the content we own or operate on our Site(s) and/or Services, you signify your acceptance of our Data Protection Policy. Where we require your consent to process your Personal Data, we will ask for your consent to the collection, use, and disclosure of your Personal Data as described further below.

1. Personal Data & GDPR

Personal Data encompasses any information that can identify you either directly or indirectly. Ainomo's collection, use, and disclosure of Personal Data are governed by this policy, alongside stringent adherence to the General Data Protection Regulation (GDPR) for our European Union users, ensuring the highest standards of data privacy.

2. Personal Data We Collect

- **Directly Provided Data:** This includes data you provide when signing up for our services, such as your name, email, and payment information for transactions.

- **Automatically Collected Data:** When you visit our Services, we collect data like your IP address, browser type, operating system, and how you interact with our Services, to improve functionality and user experience.

- **Third-Party Data:** We may receive data about you from social media platforms when you interact with our Services, enhancing our ability to provide relevant content and services.

3. Use of Personal Information

At Ainomo, we recognize the importance of your personal information and are committed to using it responsibly and transparently. Our use of personal information spans several critical areas essential for delivering our services effectively and ensuring an optimal user experience. Here's an expanded view of how we utilize your personal data:

Service Delivery and Management

- **Account Management:** We use your personal information to create and manage your Ainomo account, providing you with access to our services. This includes facilitating your login, managing your preferences, and providing a personalized user experience.

- **Transaction Processing:** For any financial transactions such as cryptocurrency trades or purchases, we process payment information to complete the transactions. This may involve verifying your information with payment processors and fraud prevention agencies.
- **Customer Support:** Your contact details are essential for us to offer support services. Whether you're facing an issue or need assistance with our services, we use your information to communicate with you and resolve any queries or problems.

Improvement and Development

- **Service Optimization:** By analyzing how you use our services, we identify opportunities for improvement. This could include adjusting features to better meet your needs or developing new offerings that align with user trends.
- **Innovation:** Ainomo is at the forefront of technological innovation. We use insights gathered from your data to drive research and development efforts, ensuring we remain leaders in providing cutting-edge services.
- **Feedback and Surveys:** Your opinions and feedback are vital to our growth. We may use your information to invite you to participate in surveys or provide feedback, helping us to enhance our services and understand user satisfaction.

Communication and Marketing

- **Updates and Announcements:** We keep you informed about important changes to our services, security updates, or policy changes using your contact information.
- **Promotional Offers:** With your consent, we may use your information to send you promotional messages and offers that are tailored to your interests and preferences.
- **Event Invitations:** Ainomo frequently hosts events and webinars that may be of interest to you. We use your information to extend invitations and facilitate your participation in these events.

Security and Legal Compliance

- **Security Measures:** Your personal information is crucial in helping us maintain the security of our services. We use it to verify user identity, protect against fraudulent transactions, and ensure the integrity of our platform.
- **Legal Obligations:** In some instances, we are required by law to process certain personal information. This could include maintaining financial records, complying with regulatory requirements, or responding to legal processes.
- **Fraud Prevention:** To prevent fraud and protect our users' assets, especially in cryptocurrency transactions, we analyze transaction patterns and may use your information to detect and prevent unauthorized or suspicious activities.

Cryptocurrency Transactions

- **Transaction Execution:** For users engaged in cryptocurrency transactions, we process personal and transactional data to execute trades, maintain transaction records, and provide transaction statements.

- **Security and Insurance:** In partnership with Zurich Insurance Group, we ensure that your investments are protected. Personal information is used in the context of managing insurance claims and enhancing the security of your financial transactions.

By providing detailed insights into how we use your personal information across these various dimensions, we aim to foster a transparent relationship with our users, ensuring you have a clear understanding of our practices and the value we place on your privacy and data security.

4. Sharing Personal Information

Ainomo is dedicated to maintaining the privacy and integrity of your personal information. While our default approach is to keep your information confidential, certain circumstances necessitate sharing this information with third parties. Below is an expanded explanation of these circumstances:

Service Providers and Partners

- **Operational Support:** To enhance our service offerings, we collaborate with various service providers, including cloud hosting services, customer support, and IT maintenance. These partners may access your personal data strictly for the purpose of performing services on Ainomo's behalf under strict confidentiality agreements.
- **Payment Processing:** For processing payments, we work with trusted payment processors. Your payment information is shared with these entities to facilitate transactions securely and efficiently.
- **Marketing and Analytics:** With your consent, we may share limited data with marketing and analytics partners to better understand user engagement and to tailor our marketing strategies effectively. This data is shared in a way that does not directly identify you.

Legal Requirements and Compliance

- **Regulatory Compliance:** We may disclose your information where required by law, such as in response to a court order or a regulatory directive. This ensures our compliance with legal obligations across the jurisdictions we operate in.
- **Fraud Prevention:** To protect against fraud, money laundering, and other financial crimes, we may share information with law enforcement and regulatory bodies. This collaboration helps safeguard the financial interests of our users and the integrity of our platform.

Business Transfers

- **Mergers and Acquisitions:** In the event of a merger, acquisition, or sale of company assets, your personal information may be transferred as part of the deal. We commit to providing notice before your personal data is transferred and becomes subject to a different privacy policy.

- **Subsidiaries and Affiliates:** Information may be shared within our corporate family for operational purposes and to provide a cohesive user experience across Ainomo's offerings.

International Transfers

- **Global Operations:** Due to our international presence, your data may be transferred to, stored, and processed in a country other than where you reside. In such cases, we employ stringent measures, including data encryption and contractual safeguards, to ensure the protection of your information in line with this policy.
- **Data Localization Requirements:** When required by law, Ainomo adheres to data localization norms, ensuring data is stored and processed within the territorial boundaries as mandated by specific jurisdictions.

User Consent

- **With Your Permission:** In situations outside the ones described above, we will share your personal information with third parties only after obtaining your explicit consent. This ensures you have control over who has access to your information and for what purpose.

Ainomo's approach to sharing personal information is governed by our commitment to transparency, user control, and legal compliance. We continuously evaluate our sharing practices to ensure they align with our privacy values and the expectations of our users, particularly in the context of evolving regulatory landscapes and technological advancements.

5. International Data Transfers

Ainomo operates on a global scale, which necessitates the movement of data across international borders. This section elaborates on our commitment to managing these transfers with the utmost care:

- **Global Infrastructure:** Our digital infrastructure is designed to be robust and secure, with data centers and servers located in strategic locations worldwide. This ensures that our services are both reliable and compliant with regional data protection laws.
- **Compliance with International Standards:** We adhere to international frameworks and standards for data protection, such as the EU-U.S. Privacy Shield Framework, ensuring that our data handling practices meet rigorous privacy standards globally.
- **Contractual Safeguards:** When transferring data internationally, we implement standard contractual clauses approved by the European Commission or rely on other legal mechanisms that provide an adequate level of data protection as required by applicable law.
- **Data Localization:** In regions with data localization laws, we take measures to store and process data locally, ensuring compliance with such regulations. This may involve deploying local servers or partnering with local data centers.

6. Data Retention

Our data retention policies are designed to ensure that personal information is kept only as long as necessary for the purposes for which it was collected or as required by law:

- **Retention Periods:** The duration for which we retain your information depends on the type of data, the purpose for which it was collected, and legal or regulatory obligations. For example, transaction records might be kept longer than account information if required by financial regulations.
- **Review and Deletion:** We regularly review our data retention policies and practices to ensure they align with current legal requirements and best practices. When data is no longer needed, it is securely deleted or anonymized so it cannot be linked back to you.
- **User Requests:** Users can request the deletion of their personal data, except in cases where we are legally obligated to retain certain information. Such requests are processed in accordance with our user data management policies and applicable legal requirements.

7. Minors' Information

Ainomo is committed to protecting the privacy of young users. Our services are not targeted at children under the age of 18, and we do not knowingly collect personal information from minors:

- **Age Restrictions:** Our registration process includes measures to prevent minors from signing up for our service without parental consent. This may involve age verification steps during account creation.
- **Parental Consent:** In cases where our services are used by minors, we ensure that appropriate parental consent is obtained in compliance with relevant child protection laws. We provide parents or guardians with tools and options to manage their children's use of our services.
- **Education and Awareness:** We believe in educating parents and guardians about online safety and privacy. Our resources include tips on supervising children's online activities and understanding privacy settings.

By elaborating on these aspects, Ainomo demonstrates a comprehensive approach to handling international data transfers, data retention practices, and the protection of minors' information, ensuring our users are well-informed about our privacy practices.

8. Your Privacy Rights

Ainomo deeply values your privacy and autonomy over your personal data. Recognizing the importance of these rights, we have established comprehensive mechanisms to ensure you can exercise them effectively:

Detailed Explanation of Your Rights:

- **Access to Information:** You have the right to request a copy of the personal information Ainomo holds about you. This enables you to be aware of and verify the lawfulness of the processing. Upon request, Ainomo will provide a digital copy of your data in a secure manner.
- **Correction of Inaccuracies:** If your personal information is inaccurate or incomplete, you have the right to ask us to correct it. This ensures your interactions with Ainomo are based on accurate and up-to-date information.

- **Deletion of Data:** Also known as the "right to be forgotten," this allows you to request the deletion of your personal data when there's no compelling reason for its continued processing. This right is particularly relevant when the personal data is no longer necessary in relation to the purposes for which it was collected or when you withdraw consent.
- **Restriction of Processing:** You may request that Ainomo restricts the processing of your personal data under certain conditions, such as if you contest the accuracy of the data or have objected to processing, allowing time for verification or review.
- **Data Portability:** This right allows you to receive the personal data you have provided to Ainomo in a structured, commonly used, and machine-readable format, and to transmit those data to another data controller without hindrance, where technically feasible.
- **Objection to Processing:** You have the right to object to the processing of your personal data based on Ainomo's legitimate interests, direct marketing (including profiling), and processing for research or statistical purposes.
- **Automated Decision Making and Profiling:** You have the right not to be subject to decisions based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Exercising Your Rights:

- **Contact Channels:** Ainomo provides specific channels, such as a dedicated privacy email address, through which you can submit your requests. We ensure these channels are accessible and secure.
- **Verification Process:** To protect your information from unauthorized access, Ainomo may require verification of your identity before proceeding with any request related to your personal data.
- **Response Timeframe:** Ainomo commits to responding to your requests within one month of receipt. This period may be extended by two further months where necessary, considering the complexity and number of requests, of which you will be informed.

9. Updates to This Policy

Ainomo's commitment to your privacy is dynamic and responsive to changes in technology, law, and user needs. This necessitates periodic updates to our Data Protection Policy:

- **Continuous Review and Update:** Ainomo regularly reviews and updates this policy to ensure it accurately reflects our practices and complies with applicable laws and regulations.
- **Notification of Changes:** Significant changes to our Data Protection Policy will be communicated to you through various means, including but not limited to, email notifications, announcements on our website, or updates to our user interface.
- **Accessibility of the Latest Version:** The most current version of our Data Protection Policy is always accessible on our website, with the effective date clearly displayed at the top of the document.
- **Engagement and Feedback:** We encourage our users to review the updated policy to stay informed about how we are protecting your information. Ainomo welcomes feedback on our privacy practices and policy updates, reinforcing our commitment to transparency and user engagement.

Through these expanded explanations of rights and updates, Ainomo aims to provide a clear, comprehensive understanding of how we protect your privacy and keep you informed of any changes in our privacy practices.

10. Contacting Us

For inquiries about this policy or our privacy practices, reach out to us at

support@ainomo.com

finance@ainomo.com

security@ainomo.com

This detailed expansion provides a clearer understanding of our data protection efforts, reflecting Ainomo's commitment to safeguarding user privacy and security across all interactions with our Services.