

PRIVACY POLICY

Issue date: 04/26/2024

This Privacy Policy applies to the Site and all products and services offered by Beaver Dealer UAB incorporated under the laws of the Republic of Lithuania (hereinafter referred as Beaver Dealer).

This Privacy Policy regulates the order in which Beaver Dealer collects, uses, maintains and discloses information collected from users of the <https://beaverdealer.com/> website ("Site"), and other products (hereinafter collectively referred to as the "Services").

Beaver Dealer UAB is a company registered in Republic of Lithuania with the number 305928746.

Our principal address is Republic of Lithuania, Vilnius, Eisiskiu Sodų 18-th, g. 11.

This Privacy Policy applies to the Site, and all other Services offered by us.

The purpose of this Privacy Policy is to explain how we collect and use personal information.

We may update our Privacy Policy from time to time. When we do, we will post a notification on the main page of our Site.

Please read the following carefully to understand what data we collect, how that data is used and the ways it can be shared by us. If you do not wish for your Personal Information to be used in the ways described within this Privacy Policy, then you should not access or use the Site or use any of the services.

If we, or KYC provider, determine that you pose a fraud, money laundering or other criminal risks, we may refuse to provide the services you have requested, or we may stop providing existing services to you.

The Services are all directed to people who are at least 18 years old. We do not collect any information from anyone under 18 years of age.

When registering with the Services you are signing up to our marketing or mailing list and will contact you occasionally via email and messengers for promoting our products and services. Processing for any purpose other than those specified in this policy are only done with your consent, which you are free to withdraw at any time.

1. The information we collect

1.1. Personal identification information

The personal identification information is collected from users only if they voluntarily submit such information to us. Users may refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

We collect and process various categories of personal information at the start of, and for the duration of, your relationship with us.

Users will be asked to provide the following data:

- a. name and family name;
- b. email address (must be provided during the process of registration on the website, e-mail address will be also used to Login);
- c. the details of the identification document (ID) or a passport (due to the KYC policy identification document will be collected during the verification process);
- d. when client uses Beaver Dealer to send crypto funds to someone else, he will have to provide information related to that transaction, namely the address of the digital wallet of the recipient;
- e. device identifiers (network and hardware): IP address, mobile device ID and software identifiers and information (operating system and browser): platform, version, headers, plug-ins, geographical location, time zone setting, cookies;
- f. information in profiles of third party products and services (messengers, social networks, cryptocurrency exchanges, wallets etc.), if provide us such data or use such products and services on your own initiative.

The Services uses a verification system that includes a photo or video conference with you personally and identity document.

Also, if we are forced to comply with a request or requirements of the competent authorities, and/or we have reason to suppose that invalid or suspicious activity is made under your account, we can reasonably ask you to provide additional documents, in particular documents certifying the origin of funds.

How we collect personal info?

We may collect personal identification information from users in a variety of ways: when users visit our Site, register on the Site, fill out a form, and in connection with Services available. When users have an account on a third party services (crypto, wallets etc.) and add API keys for this service to the Site. When users get payment transaction by our Services including cryptocurrency transactions. When users communicate with us for customer service or other purposes (e.g. by emails, chat etc.), or provide any feedback, we keep such information and our responses to you in the records of your account.

Special categories of data.

We do not save payment card details (number, expiration, CVV/CVC). We do not collect any information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health and genetic and biometric data.

1.2. We process aforementioned information on the following legal basis and purposes:

- a. name; email address (to identify you as a client and distinguish you from other users of our Service; to let you register on our platform; to provide you with customer and technical support, to provide you with advertising materials, provided, however, that we receive prior consent from you to perform such activity);
- b. the details of identification document (ID) or a passport; document containing MRZ code (due to the KYC policy we have to conduct the verification process).
- c. financial information, including your bank account and transactional information and history (we need to verify that bank account belongs to you; you have to add a bank account if you are going to make fiat transactions: add and withdraw);

d. When you use Beaver Dealer to send crypto funds to someone else, you will have to provide information related to that transaction, namely the address of the digital wallet of the recipient.

e. We, upon receiving your consent, may provide you with promotional messages and other information about products, events and services of ours, our affiliates, and third parties such as sponsors and notices and other information related to the Service and your interests. By selecting the checkbox “I agree to subscribe to promotional messages and other information about products, events and services of ours, our affiliates and third parties such as sponsors, and notices and other information related to the Service and my interests”, you consent that we may send all such aforementioned materials and information to your email. You are in your right to cancel your consent, as a result, you will no longer receive such aforementioned materials to your email.

We collect mentioned information to comply with legal and regulatory requirements, to carry out Know-Your-Customer policy; to prevent fraud, money laundering or unauthorized use of your account.

2. Cookie policy

2.1. Web browser cookies

By continuing to use the Site, you unconditionally agree to our use of cookies.

A ‘cookie’ is a small piece of data sent from a website or mobile application and stored on your device by web browser while you’re browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your device so that the next time you visit that site, your device will remember essential information. This helps us to provide you with a good experience when you use the Services.

Please note, that third parties, including, but not limited to advertising networks, payment service providers, web traffic analysis services may also use mainly performance or targeting cookies, over which we have no control.

Under the Regulation 2016/679 (EU GDPR), if any cookies act as online identifiers or are classed as personal information, you have the right to turn such cookies off when visiting a website. At Beaver Dealer we only use cookies on Site that are essential for the normal functioning of the website and as such cannot be turned off in full. However, you can also control the settings of cookies in your browser settings that allows you to refuse all or some cookies.

We only retain your information for as long as is necessary and for the purposes specified in this notice. Except for cookies that are necessary, performance or functionality, all other cookies will expire after 10 years.

2.2. Different types of cookies

We use the following cookies:

- a. strictly necessary cookies, that are required for secure operating of the user's account in the Services allowing among other things the logging in option.
- b. performance cookies, that are required for load balancing by means of recognising and counting the number of active users of the Software.
- c. functionality cookies, that help us to personalise content and store your preferences allowing automatic choice of language and region.

d. targeting cookies, that help us to relevant to your interests by recording the pages you have visited and the links you have followed. We may use this information to make the advertising displayed on website.

Persistent cookies stay on your device after you've visited our website. Persistent cookies help us identify you as a unique visitor. The length of time a cookie stays on your device depends on its type.

3. Sharing and disclosing of the personal information.

We do not share or disclosure any of your personal information without your consent, other than for the purposes specified in this notice, where there is a legal requirement or to enforce our terms and conditions.

We may share your information with selected third parties including:

- a. affiliates, business partners, KYC-providers, suppliers and sub-contractors for the performance and execution of any contract we enter into with them or you;
- b. advertisers and advertising networks solely to select and serve relevant adverts to you and others;
- c. analytics and search engine providers that assist us in the improvement and optimisation of our website;
- d. our group entities or subsidiaries.

We may also receive information about you from third parties with obligation to use, disclose and store all of this information in accordance with this Privacy Policy.

We use several payment services providers (PSPs) to process the transactions on Site and other Services. Any sensitive payment information is processed directly by their servers, meaning that we do not store any sensitive payment details. By starting the payment process for an order, you shall agree to your information being processed by the above PSPs. All payment functions are carried out on the PSP's secure site, which is to their own terms and conditions.

The Services may contain links to and from third party websites. By following these links please note that these websites have their own privacy policies and that we do not accept any responsibility for them. Please check these policies before you submit any personal data to these websites.

4. How we store and secure collected information

4.1. High standards of information security

Beaver Dealer takes the security of the data that it collects very seriously. Beaver Dealer has implemented a number of technical, organizational and administrative measures which are generally accepted by the industry to protect the Personal Information in its possession. These measures include, but are not limited to the implementation of current security technologies and processes to protect your information from loss, misuse and unauthorized access, disclosure, alteration or destruction. Additionally, we use encryption (HTTPS/TLS) to protect data transmitted to and from our Websites.

Transport Layer Security (TLS) is a protocol that provides privacy and data integrity between two communicating applications. It's the most widely deployed security protocol used today, and is used

for Web browsers and other applications that require data to be securely exchanged over a network, such as file transfers, VPN connections, instant messaging and voice over IP.

Beaver Dealer is committed to handling your information with high standards of information security. We use computer safeguards such as firewalls and data encryption. However, the transmission of such data over the Internet using personal computers or mobile devices is not completely safe and therefore we cannot guarantee the security of documents submitted to our platform. Any transmission of such documents is at your own risk. As soon as we receive your private information, we implement strict security measures and procedures to avoid unauthorized access from any third party.

The security of your account also relies on your protection of your password. You may not share your password with anyone. Our representatives will never ask you for your password, so any email or other communication requesting your password should be treated as unauthorized and suspicious and forwarded to our customer support.

4.2. Retention of your Account Information

In general, although there are limited exceptions, we will retain your information during the period when you are using the Services and for at least 5 years after your use of the Services ceases. Information associated with your account will be kept until your account is deleted, unless we no longer need the data to provide products and services

We store collected information for as long as it is necessary to be able to provide products and services to you. In some cases, we can keep your information longer than 5 years: such exceeding can be used only in a case of arising of legal requirements that will oblige us to store your information for more than 5 years. We also store information on your transactions for 5 years due to the requirements of anti-money laundering laws and other legal acts. However, the information may be, wholly or in part, retained for longer or shorter term if required by applicable law or if there is other justified reason to retain or delete them.

5. Rights of users

You have the right to be granted an access to personal information that Beaver Dealer holds or processes about you and to request information about:

- a. what personal information we hold;
- b. the purposes of processing of personal information;
- c. the categories of personal information concerned;
- d. the recipients to whom the personal information has/will be disclosed;
- e. how long we intend to store your personal information for;
- f. if we did not collect the information directly from you, information about the source

If you believe that we hold any incomplete or inaccurate information about you, you have the right to ask us to correct or complete the information, and we will strive to update/correct it within a reasonable time, unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal information or to restrict its processing in accordance with the data protection law, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.

If we receive a request for any of the above rights, we may ask you to verify your identity before acting on the relevant request to be ensured your information is protected and kept secure. In any case you are able to modify and update some of your personal information by logging into your account of the Services.

6. The location of Personal Information processing and storage

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy. We ensure that both ourselves and our partners take adequate and appropriate technical, physical and organizational security measures to protect your data. We also ensure we have appropriate contractual protections in place with these third parties.

7. Safeguarding Measures

Although we will do our best to protect your personal data, we cannot guarantee the security of your data during transmission, and any transmission is at your own risk. Once we have received your information, we will use security features and take every reasonable measure to try to secure your personal information and prevent unauthorized access, alteration, disclosure or destruction.

8. Consequences of Not Providing Your Information

You are not obligated to provide your personal information to Beaver Dealer, however, as it is required so that we can process your order(s) and meet our business obligations, we will be unable to provide you with the Services without it.

9. Know Your Customer (KYC) & Anti-Money Laundering (AML) Policy.

Beaver Dealer protects itself from involvement in money laundering or suspicious activity by the following:

- performing an enterprise-wide risk assessment to determine the risk profile of the company;
- establishing AML policies and procedures;
- implementing internal controls throughout its operations that are designed to mitigate risks of money laundering;
- performing know your customer ("KYC") procedures on all users;
- conducting an annual AML audit;
- providing AML training to all employees.

KYC procedures including verification and initial checking of documents are carried out by Sum&Substance.

9.1. KYC procedures

By accepting this policy and agreeing to further use of Beaver Dealer UAB services, you agree that from time to time, at any time, as part of Due Diligence procedures, you may be asked for documents confirming your identity, location, legal capacity and origin of funds, as well as documents identifying a legal entity, such documents include on limiting:

- ID card, passports and other citizen's certificates;
- utility bills and other confirmations of permanent residence;
- bank statements;
- documents confirming the origin of funds, including but not limited: contracts, salary certificates, documents confirming the right to dividends, tax returns and others;
- documents of a legal entity including a certificate of incorporation, a certificate of shareholders, a certificate of the director and an up-to-date extract from the register.

By using the Beaver Dealer UAB services, you understand and accept that you are acting solely on your own behalf and not for the benefit of third parties. Anonymous use of the services is prohibited.

Due Diligence is carried out in several levels, usually depending on the amount of the transaction, however, the Beaver Dealer can request documents in case of any suspicion, regardless of the transaction amount.

Verification may take some time depending on the provision of the requested documents by you. Beaver Dealer may refuse to conduct a transaction with a high risk of violating AML legislation. It is our direct duty to transfer data on suspicious transactions to the authorized body.

10. Policies

The Policy will be approved by the Beaver Dealer director. All policies and procedures will be reviewed and updated or revised as needed, but no less often than annually.

11. Internal control

Beaver Dealer has developed and implemented internal controls for the purpose of ensuring that all of its operations comply with all AML legal requirements and that all required reports are made on a timely basis.

12. Users identification

It is Beaver Dealer policy to ensure that it has reasonably identified each customer who uses the Services. Users may be identified using a variety of methods.

13. Account opening procedure.

Additionally, Beaver Dealer will, as part of its account-opening process: (i) cross-check the names of users against compliance databases and other governmental watch lists; (ii) require users to provide proof of identification.

13.1. Proof of identification:

- Name
- Date of birth
- Official issued identification number (passport number)

13.2. Verification

Documents used in opening an account relationship must be verified prior to establishing the account. Verification of identity will require multi-factor authentication, layered security and other controls to ensure a meaningful user identity confirmation process based on account size or other factors.

The following are examples of verification methods the Beaver Dealer may use:

- Comparing the identifying information with information available from a trusted third party source, such as The Sum&Substance an automatic ID verification solution, that is used by financial institutions and many other service providers that have a need for trust. The Sum&Substance allows to digitize our users onboarding process while fighting fraud and complying with KYC regulations and obligations.
- Analyzing whether there is logical consistency between the identifying information provided, such as the customer's name, date of birth.
- When the type of account increases the risk that Beaver Dealer will not be able to verify the true identity of the customer through documents is confirmed the account will be closed.

14. Suspicious transactions and activity reports

Beaver Dealer will diligently monitor transactions for suspicious activity. Transactions that are unusual will be carefully reviewed to determine if it appears that they make no apparent sense or appear to be for an unlawful purpose. Internal controls will be implemented so that an ongoing monitoring system is in place to detect such activity as it occurs. When such suspicious activity is detected, Beaver Dealer will determine whether a filing with any law enforcement authority is necessary.

Suspicious activity can include more than just suspected money laundering attempts. Activity may be suspicious, and Beaver Dealer may wish to make a filing with a law enforcement authority, even if no money is lost as a result of the transaction.

Beaver Dealer will initially make the decision of whether a transaction is potentially suspicious. Once Beaver Dealer has finished the review of the transaction details, he or she will consult with our senior management to make the decision as to whether the transaction meets the definition of suspicious transaction or activity and whether any filings with law enforcement authorities should be filed.

Beaver Dealer will maintain a copy of the filing as well as all backup documentation. The fact that a filing has been made is confidential. No one, other than those involved in the investigation and reporting should be told of its existence. In no event should the parties involved in the suspicious activity be told of the filing. Beaver Dealer may inform the law enforcement authorities of the filing and the underlying transaction.

15. Reporting requirements

Reasonable procedures for maintaining records of the information used to verify a person's name; address and other identifying information are required under this policy. The following are required steps in the record keeping process:

- Beaver Dealer is required to maintain a record of identifying information provided by the customer.

- Where the Beaver Dealer relies upon a document to verify identity, must maintain a copy of the document that the Beaver Dealer relied on that clearly evidences the type of document and any identifying information it may contain.
- Beaver Dealer must also record the methods and result of any additional measures undertaken to verify the identity of the customer.
- Beaver Dealer must record the resolution of any discrepancy in the identifying information obtained.
- All transaction and identification records will be maintained for a minimum period of five years.

16. Sanctions policy

The Beaver Dealer applies international sanctions, such as UN sanctions, EU sanctions, FATF restrictions, as well as the USA and Canada.

Unfortunately, we do not serve users of the following countries due to the restrictions imposed:

Albania, Afghanistan, Barbados, Burkina Faso, Cambodia, Cayman Islands, Democratic People's Republic of Korea, Ghana, Haiti, Iran, Iraq, Jordan, Jamaica, Morocco, Myanmar, Nicaragua, Pakistan, Panama, Philippines, Senegal, Syria, Uganda, Yemen, Zimbabwe, Malta, Mali, China, Bangladesh, Vietnam, Bolivia, Venezuela, South Sudan, Sudan, Democratic Republic of the Congo, Libya, Mali, Somalia, Algeria, Tunisia, Guinea, Belarus, Ukraine, Russia, CAR, Bosnia and Herzegovina, Oman, Egypt, Nepal, Qatar, USA, Canada