

Privacy Policy

Lunohod Capital

1. Introduction

The proper handling of personal data is extremely important to us. We therefore take your privacy seriously when processing and protecting your personal data. This is done in accordance with provisions set out in the applicable privacy laws (including the General Data Protection Regulation). We want you (hereinafter: «user») to understand how and why Lunohod Capital, an exempted company incorporated in the Cayman Islands with limited liability, registered number ST-343027 (hereinafter: «Lunohod Capital» «we» «our» or «us») collects, processes, uses, and shares your personal information (hereinafter: «Personal Information», «PI», «PD») when you use our services, website (<http://lunohod-capital.com>), applications and other online and offline products (collectively, the «Services») or when you otherwise interact with us or receive a communication from us.

We may revise this Privacy Policy from time to time. The current version of the policy will govern our processing of your personal data and will always be available at <http://lunohod-capital.com>. If we make a change to this policy that, in our sole discretion, is material, we will notify you via an email to the email address associated with you. If required by law, we will request your permission or give you the opportunity to opt out of any new uses of your Personal Information.

We take great care to limit the Personal Information we collect and use only for the purposes, which are necessary for providing our Services.

Lunohod Capital collects and processes personal information that is necessary for legitimate business purposes, which will be disclosed to the data subject. Lunohod Capital will use and process this information only for the purposes for which it was collected, retaining the personal information only for so long as it is required for specific purpose of collecting the information.

Lunohod Capital will not collect sensitive personal data except when permitted or required to do so by law, and will do so only for legitimate business purposes. If in any other instance a need arises to collect sensitive personal data, Lunohod Capital will do so only with the data subject's express consent, which can be withdrawn at any time.

We retain your Personal Data for as long as it is required to satisfy the purpose for which they were collected and used, unless a longer period is necessary for our legal obligations or to defend a legal.

We do not transfer your Personal Data to third Parties, except circumstances mentioned in this Privacy Policy.

2. Personal Information

2.1. Personal Information we collect and use

Basic information for AML / CFT purposes. To become a Client, you must provide:

- A. Full name as per identity document (e.g. internal or external passport) of the Client,
- B. Date of Birth, Gender, Marital status, Religion, Occupation, and Qualification;
- C. Residential Status, Nationality, Country of Residence;;
- D. Details of Employer/Business;
- E. Copy of passport;
- F. Existing mailing and permanent address;
- G. Residential telephone number, office telephone number, fax number, mobile number and email address;
- H. Source of income, gross annual income, expected value of investment;
- I. Knowledge of stock market and investment experience.

The information that we also collect includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including operator name and phone number and application version number. We also may collect information about the interaction of your browsers and devices with our services, including OS, IP address, specifications and the date, time and referrer URL of your request.

To use our services. We may collect the computer name, ip, mac address for user identification of his computer (hereinafter: «rig»). We may also collect the data about quantity, name, characteristics of the equipment rig. For example, we may collect information about video cards, their name and memory size, processors, name and their clock frequency.

Other information. You may choose to provide other information directly to us. For example, we may collect information when you request customer support or otherwise communicate with us. You may provide us with the information about your email to receive mailings and to confirm transactions. You can add more information in your profile.

2.2. Personal Information We Collect Automatically

When you access or use our Services, we may also automatically collect information about you. This includes:

Technical data. We may log information when you access and use the Services. This may include your IP address, browser type, operating system, device information (e.g., device IDs), hardware settings.

Logs of our services, including messages about their work problems, may contain the driver versions, software installation paths, and the computer's operating time.

Information collected from cookies. When you use our website, we may send one or more cookies to collect data analytics. When you use third-party affiliate links registered in our services, cookies will be stored on your device within 14 days from the moment of using such link, for the purposes of successful registration.

Location information. We may receive and process information about your location.

3. Purposes of Personal Information collection

We may deliver, personalize, and improve our Services by combining and using the information we have about you (including information we receive on and off our Services) to understand how you use and interact with our Services and the people or things you're connected to and interested in. We also may use the information we have about you for the following purposes:

- a. Provide, maintain, improve, and develop relevant features, content, and Services;
- b. Fulfill your requests and when authorized by you;
- c. Research and develop new services;
- d. Detect and defend against fraudulent, abusive, or unlawful activity;
- e. We use your location to personalize the content you provide and to serve targeted ads;
- f. Research and develop new services;
- g. Send you technical notices, updates, security alerts, invoices and other support and administrative messages;
- h. Provide customer service;
- i. Communicate with you about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to you;
- j. Telephone number and address of the wallet can be used for implementation of transactions;
- k. The e-mail address can be used to carry out mailings with your consent;
- l. Personalize the Services and provide advertisements, content and features that match user profiles or interests.

We collect general anonymous analytical information on the use of the services for their optimization.

We provide you with controls to manage your experience with us. You can at any time request a change of the privacy settings.

4. Usage, processing and disclosure of PI.

Our privacy policy applies only to the Lunohod Capital Services. Lunohod Capital may contain links to other websites and file downloads from other websites. We do not exercise control over any website that may be linked to from within content on this website. We are not responsible for the privacy practices or content of such websites.

When you use the Services, certain information may be shared with other users and the public. For example:

When you submit content (such as a post or comment) to the Services, any visitors to and users of our Services will be able to see that content, the username associated with the content, and the date and time you originally submitted the content.

When other users view your profile, they will be able to see information about your activities on the Services, such as your username, prior posts and comments, information about you, and how long you have been a member of the Services.

We do not transfer your Personal Data to third Parties, except cases, that are mentioned in this Privacy Policy.

With our partners. We may share information with vendors, consultants, and other service providers (but not with advertisers and ad partners) who need access to such information to carry out work for us. The partner's use of personal data will be subject to appropriate confidentiality and security measures. For example: to make payments, confirm phone numbers and improve the functioning of the services.

To comply with the law (including money laundering). We may share information in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process or governmental request, including, but not limited to, meeting national security or law enforcement requirements. To the extent the law allows it, we will attempt to provide you with prior notice before disclosing your information in response to such a request.

In an emergency. We may share information if we believe it's necessary to prevent imminent and serious bodily harm to a person.

To enforce our policies and rights. We may share information if we believe your actions are inconsistent with our user agreements, rules, or other Lunohod Capital policies, or to protect the rights, property, and safety of ourselves and others.

With our affiliates. We may share information between and among Lunohod Capital and any of our parents, affiliates, subsidiaries, and other companies under common control and ownership.

With your consent. We may share information about you with your consent or at your direction.

We engage service providers to perform functions and provide services to us. For example, we use a variety of third-party services to help operate our services and to help us understand the use of our services, such as Google Analytics. We may share your private personal data with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions. We share your payment information with payment services providers to process payments; prevent, detect, and investigate fraud or other prohibited activities; facilitate dispute resolution such as chargebacks or refunds; and for other purposes associated with the acceptance of credit and debit cards.

We may partner with third-party advertisers, ad networks to deliver advertising and content targeted to your interests and to better understand your use of the Services. These third parties may collect information sent by your computer, browser, or mobile device in response to a request for content, such as unique identifiers, your IP address, location or other information about your computer or device.

If you submit personally identifiable information to us through the Lunohod Capital Services, then we may use your personal information to operate, maintain, and provide features and functionality of the our website, app and other services.

Other information, that does not personally identify you as an individual is collected by Lunohod Capital (such as, by way of example, patterns of use) and is exclusively owned by Lunohod Capital. Lunohod Capital can use this information in such manner that Lunohod Capital, in its sole discretion, deems appropriate.

We may share specific aggregated, non-personal information with third parties, such as the number of users who have registered with us, the volume and pattern of traffic to and within the website, etc. That information will not identify you, the individual, in any way.

We shall not use your email or other contact information for sending of commercial proposal, other marketing needs, without your prior consent.

As were mentioned above, when you send us messages, we can keep them for administering of your inquiries, for improving of our services. We shall not transfer information from such messages to third parties.

5. Cookies

A cookie is a small piece of data that is stored on your computer or mobile device. Like many websites, we use cookies and similar technologies to collect additional website usage data and to operate our services. Cookies are not required for many parts of our services. Although most web browsers automatically accept cookies, many browsers' settings can be set to decline cookies or alert you when a website is attempting to place a cookie on your computer. However, some of our services may not function properly if you disable cookies. When your browser or device allows it, we use both session cookies and persistent cookies to better understand how you interact with our services, to monitor aggregate usage patterns, and to personalize and otherwise operate our services.

When you visit the Lunohod Capital website, we may send one or more cookies. Lunohod Capital uses both session cookies and persistent cookies. A persistent cookie remains after you close your browser. your browser may use persistent cookies on subsequent visits to the site. Persistent cookies can be removed by following the directions in your web browser's help file. A session cookie is temporary and disappears after you close your browser. you can reset your web browser to refuse all cookies or to indicate when it receives a cookie.

We show you the Cookie-banner for receiving of your appropriate consent for usage of Cookies. You are able to restrict our usage of Cookies anytime in your profile settings. It is impossible to maintain our website without minimal usage of Cookies and this is why we show you the Cookie-banner. We use required Cookies even if you do not accept banner.

6. Your rights regarding collected PI

You can access and change certain information through the Services.

If you initially consent to our collection of location information, you can subsequently stop the collection of this information at any time by changing the preferences on your browser.

You have the right to receive information regarding purposes of Personal information collection, regarding third parties, to which we disclose your personal information, information, regarding safeguards that are applicable for secure storage of your Personal information, period of time for which Personal information will be stored.

You also have the right to demand erasure of personal data concerning you sending us a request. Lunohod Capital shall fulfill your request in appropriate period of time. If there is no other lawful ground for storing and processing of your PI, as prescribed by applicable law, Lunohod Capital shall erase such information. If there is another legal ground for such processing, Lunohod Capital shall notify you in appropriate period of time.

You also have the right to demand restriction of the storing and processing of the PI, if legal grounds for such demands have arisen / as prescribed in applicable law.

You have the right to object processing of personal data concerning yourself under circumstances, that are prescribed in applicable law. In case of such objection, Lunohod Capital shall restrain from processing of your PI, if there will be no other legal grounds for continuing of processing.

Lunohod Capital takes your rights very seriously. However, if you are of the opinion that we have not dealt with your complaints adequately.

You have the right to ask Lunohod Capital to provide you with a structured, list of previously provided PI. You also can ask Lunohod Capital to transmit your PI to previously chosen third party.

To send a request for delete, rectification and submission of PD please use the feedback form.

7. Collection of Children's PI

Children can not use our services even under the supervision of their parents/legal guardians.

Personnel of Lunohod Capital does not knowingly collect or maintain personally identifiable information or non-personally-identifiable information on the Lunohod Capital Services from persons under 18 years old, and no part of our services is directed to persons under 16. If You are under 18 years old, then please do not use or access the Lunohod Capital Services at any time or in any manner. If Lunohod Capital learns that personally identifiable information of persons less than 18 years old has been collected on the Lunohod Capital Services without verified parental consent, then Lunohod Capital will take the appropriate steps to delete this information.

Additionally, if you are in the EEA, you must be over the age required by the laws of your country to become a client or otherwise use the Services, or we need to have obtained verifiable consent from your parent or legal guardian.

8. Protection of the Personal Information

We provide the following safety measures regarding protection of Your PI:

- evaluation of the effectiveness of used security measures, prior to the launch of the website and its updates;
- establishing rules to access to personal data processed by the website, as well as ensuring registration and recording of all actions performed with PI in the information systems of the website;
- detection of the facts of unauthorized access to PI and the adoption of appropriate response measures;
- restoration of PI that was modified or destroyed due to unauthorized access to them (within the framework of technical capability of the Project).

We use, store and process your PI on Lunohod Capital servers in Germany. But we may process your PI in various jurisdictions, where our facilities and/or service providers are located. By filling a "consent application "You agree to this transfer, storing, or processing. Lunohod Capital will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Policy. Lunohod Capital protect your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards Lunohod Capital use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. Lunohod Capital also authorize access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent than in your country. From time to time, the Personal Data may be also stored in other locations, and in such cases, Lunohod Capital will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

9. Data transfers

Remember, You are able to control your PI with help of privacy settings.

When we transfer PI outside the European Union or EFTA, we ensure, that the adequate level of PI security is provided. During such transfer, we also ensure that adequate level of your rights protection is also applied, on the basis of adequacy analysis of the third country personal data protection legislation, on the basis of contractual obligations, assumed by the PI recipient.

If at any time in the future, we propose to use personal information for any purpose other than our internal use in maintaining the services, troubleshooting, improving our services, etc., then we will offer you an effective way to opt out of the use of personal information for those other purposes.

We do not use your email address or other personally identifiable information to send commercial or marketing messages without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out. We may, however, use your email address without further consent for non-marketing or administrative purposes (such as notifying you of major Lunohod Capital website changes or for customer service purposes).

We restrict access to personal information to our employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject

to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

10. Notification

In the case of a Personal Data breach, Lunohod Capital shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal information breach to the supervisory competent authority, unless the personal information breach is unlikely to result in a risk to the rights and freedoms of natural persons.

If Lunohod Capital becomes aware of security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. Lunohod Capital may post a notice on our website if the security breach occurs.

When the personal data breach is likely to result in a high risk to the rights and freedoms of users, the Lunohod Capital will inform you.

In the event that Lunohod Capital is acquired by or merged with a third party entity, we reserve the right, in any of these circumstances, to transfer or assign the information we have collected from our Users as part of such merger, acquisition, sale, or other change of control. If we become involved in a merger, acquisition, or any form of sale of some or all of its assets, we will notify Users before personal information is transferred and becomes subject to a different privacy policy. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how Your personal information is treated, transferred, or used.

11. Changes to This Privacy Policy

We may revise this Privacy Policy from time to time. The most current version of the policy will govern our processing of your personal data and will always be at the website <http://lunohod-capital.com> If we make a change to this policy that, in our sole discretion, is material, we will notify you via an email to the email address associated with you. If required by law, we will get your permission or give you the opportunity to opt out of any new uses of your Personal Information.

9.01.2019

Artem Shaginyan _____

Acting under power of attorney