



PRIVACY POLICY

1. INTRODUCTION

This policy (“**Privacy Policy**” or the “**Policy**”) discloses the privacy practices of LGO SAS, LGO Europe SAS, and LGO Markets LLC (collectively, “**LGO**” and referred to herein as “**we**,” “**us**,” and “**our**”) and the LGO website (collectively, the “**Website**” located at <https://lgo.group>). The following depicts the information LGO collects from you and how LGO protects and uses that information.

LGO is committed to protecting your privacy and will never sell your information to anyone. LGO keeps any personal data it collects in accordance with the applicable privacy and data protection laws and regulations, including the General Data Protection Regulation (“GDPR”), its successors or implementing texts as well as equivalent legislation.

Last Updated: March 23, 2020

1.1 Scope

LGO SAS is a French company having its registered office at 675 route du Puy d'Or 69760 Limonest, France. LGO Europe SAS is a French company having its registered office at 110 rue du jardin public, 33000 Bordeaux, France. LGO Markets LLC is registered in Delaware with its principal place of business at 221 River St., 9th Floor, Hoboken, New Jersey 07030. LGO Markets and LGO Europe are wholly-owned subsidiaries of LGO SAS. This Policy applies to all business lines of LGO.

1.2 Purpose

The purpose of this Privacy Policy is to describe:

- The types of information we collect and how it may be used or retained;
- The Website’s use of cookies and similar technology;
- How and why we may disclose your personal data to third parties;
- The transfer of your personal information;
- Your statutory rights concerning your information; and
- The security measures we use to protect and prevent the loss, misuse, or alteration of your personal information.

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1.3 Acceptance of the Privacy Policy

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY ACCESSING OR USING THE LGO WEBSITE, LGO SERVICES, LGO ACCOUNT, OR LGO PLATFORM (INCLUDING THE LGO API AS SUCH EXISTS AND MAY EXISTS IN THE FUTURE), YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND TO ALL THE TERMS OF THIS PRIVACY POLICY AND THE LGO TERMS OF USE AND SERVICE.

1.4 Changes to Privacy Policy

LGO reserves the right to modify this Policy at any time. If we decide to change this Policy, we will post those changes online or any other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

2. DEFINITIONS

“**Authorized Third-Party Service Providers**” means third-parties that perform functions on our behalf, like sending out and distributing our administrative and promotional emails.

“**Cookie**” means a small text file that is stored on a user’s computer for record-keeping purposes which contains information about that User.

“**Digital Asset**” means bitcoin, stablecoins (USDC and Pax Standard), or any other virtual currency LGO decides to list on the LGO Platform or offer through the LGO Services.

“**LGO Account**” means the account opened by the Client with LGO Europe or LGO Markets in order to access the trading platform and other LGO Services pursuant to which the Client has been approved to use the LGO Platform and agreed to LGO’s Terms of Use and Service and this Privacy Policy.

“**LGO Platform**” means the trading platform owned by LGO SAS and operated by LGO Europe and LGO Markets.

“**LGO Services**” means the granting of access to the LGO Platform and other services provided by LGO presently and to be provided by LGO, in its sole discretion, in the future.



“**NPII**” means Non-Personally Identifiable Information, i.e. information that does not identify a specific individual. This type of information may include things like the Uniform Resource Locator (“**URL**”) of the website you visited before coming to our Website, the URL of the website you visit after leaving our Website, the type of browser you are using and your Internet Protocol (“**IP**”) address.

“**PII**” means Personally Identifiable Information, i.e. information that identifies an individual, such as name, address, or email address. PII does not include anonymised and/or aggregated data that does not identify a specific user.

3. COLLECTION AND USE OF INFORMATION

3.1 Information Collected from Website Users

LGO respects the privacy of any users who access its Website and is committed to taking all reasonable steps to safeguard all website visitors.

We, and/or our Authorized Third-Party Service Providers, may automatically collect NPII when you visit our Website through the use of electronic tools like Cookies and Web beacons or Pixel tags (*see* Cookie Policy below). We use NPII to troubleshoot, administer the Website, analyze trends, gather demographic information, comply with applicable law, and cooperate with law enforcement activities. We may also share this information with our Authorized Third Party Service Providers and Advertisers to measure the overall effectiveness of our online advertising, content, and programming.

3.2 Information Collected When Opening an LGO Account

LGO protects information submitted to it during the client onboarding process on secured servers in line with best industry practices.

LGO requires clients and prospective clients to undergo user identity authentication procedures in order to comply with global regulatory standards regarding Anti-Money Laundering (“**AML**”), Know-Your-Customer (“**KYC**”), and Counter Terrorist Financing (“**CTF**”). LGO retains the following information prior to opening an LGO Account:

- Full legal name (for individuals) and entity legal name (for institutions);
- Date of birth (for individuals);
- Physical address:

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- for an individual: a residential address (no P.O. box); or
- for a non-individual (corporation, trust, etc.): a principal place of business, local office, or other physical location;
- Country of citizenship;
- Phone number and email address;
- Social security number for a U.S. person (U.S. citizen or non-individual established or organized under U.S. or state laws) and tax identification number (for institutions);
- Regulating entity(ies) if applicable;
- List of officers, directors, beneficial owners, controlling parties, and authorized traders (for institutions);
- Identification number for non-U.S. person, which may include a taxpayer I.D. number; passport number and country of issuance; alien identification card number; or the number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photo or similar safeguard.

In addition, the following documents shall be obtained to verify institutions:

- Articles of incorporation, articles of organization, partnership agreement, or joint venture agreement;
- Certificate of incumbency or list of authorized signatories (including corresponding state I.D. if applicable);
- Form W-8 or Form W-9 (or equivalent for non-U.S. applicants);
- Government-issued business licenses or certificate of good business standing; and
- Any other similar corporate documents.

3.3 Information Collected While Using the LGO Services

LGO collects additional information throughout your use of the LGO Services, Platform, and Account. Transaction data may also be recorded to a blockchain, which by its nature may be immutable.

Service Usage Information: Through your use of the LGO Services, we also monitor and collect tracking information related to usage such as access date & time, device identification, operating system, browser type and IP address. This information may be directly obtained by LGO or through third-party services. This service usage data helps us our systems to ensure that our interface is accessible for users across all platforms and can aid during criminal investigations.



Transaction Information: For all LGO Accounts, we collect transaction information including deposit and withdrawal information, account balances, trade history, and order activity. This transaction data is monitored for suspicious trading activity for user fraud protection, and legal case resolution.

Blockchain Data: Transactions in your LGO Account using bitcoin and other Digital Assets may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

Because blockchains are decentralized or third-party networks which are not controlled or operated by LGO, we are not able to erase, modify, or alter personal data from such networks.

4. COOKIE POLICY

4.1 Data Tracking Cookies

We use cookies to facilitate and customize your experience with the Website, save you time while using the Website, remind us who you are, and track and target your interests.

Cookies are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site, like which pages you visited and what links you clicked on. We may use third party service provider(s), to assist us in better understanding your use of the Website. By using the Website, you consent to cookies being stored on your device.

Most browsers automatically accept cookies, but you may be able to modify your browser settings to decline cookies. Please note that if you decline or delete these cookies, some parts of the Website may not work properly. More information on cookies and their use can be found at www.aboutcookies.org or www.allaboutcookies.org.

4.2 Other Tracking Devices

We may use other industry standard technologies like pixel tags and web beacons to track your use of our Website pages and promotions, or we may allow our Third-Party Service Providers to use these devices on our behalf.

Pixel tags and web beacons are tiny graphic images placed on certain pages on our Website, or in our emails that allow us to determine whether you have performed a specific action. When you

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access these pages or open or click an email, pixel tags and web beacons generate a NPPI notice of that action. Pixel tags allow us to measure and improve our understanding of visitor traffic and behavior on our Website, as well as give us a way to measure our promotions and performance. We may also utilize pixel tags and web beacons provided by our Affiliates and/or Marketing Partners for the same purposes.

5. RELEASE OF PERSONALLY IDENTIFIABLE INFORMATION

5.1 Sharing with Authorized Third Parties

We will not share, sell, rent, or trade your PII with other parties outside of that which is indicated in his Policy.

We may share your information with Authorized Third-Party Service Providers. We may share your PII with such Service Providers to fulfill regulatory obligations, verify Client's identities, provide customer service, send emails, administer contests or sweepstakes, remove repetitive information on customer lists, analyze data, provide marketing assistance, provide search results and links, operate the Website, and troubleshoot.

LGO's third-party service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. Such third parties are bound to comply with applicable data privacy and protection laws.

5.2 Remarketing

We may remarket your information. Remarketing is a way for us to connect with users, based upon your past interactions with the LGO website.

Third-party marketing vendors may be hired by LGO to perform remarketing services. As a result, third-party vendors, including Google, may show LGO ads on sites on the internet. Third-party vendors, including Google, use cookies to serve ads based on a user's prior visits to the LGO Website. Users may opt out of Google's use of cookies by visiting the Google advertising opt-out page [here](#). This information is used only for remarketing purposes and will not be used by them for any other purpose.

5.3 Disclosure Required by Law

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We may share your information for our protection and the protection of others. Your personal data may be shared if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of legal claims.

We reserve the right to disclose your PII as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process; enforce or apply this Privacy Policy, our Terms of Use and Service or other agreements; or protect the rights, property or safety of the Website, its Users or others.

With respect to U.S. residents, we also may share your information with other financial institutions as authorized under Section 314(b) of the US Patriot Act, and with tax authorities, including the Internal Revenue Service, pursuant to the Foreign Account Tax Compliance Act (“*FATCA*”), to the extent that this statute may be determined to apply to LGO.

6. RELEASE OF NON-PERSONALLY IDENTIFIABLE INFORMATION

We may disclose or share NPII with Partners, Affiliates and Advertisers. For example, we may share aggregated demographic information (which does not include any PII) with “Third Party Advertisers” or “Third Party Advertising Companies” and other parties as provided below:

- We use Third Party Advertising Companies to serve ads when you visit our Website. These companies may use NPII about your visits to this and other websites in order to provide, through the use of network tags, advertisements about goods and services that may be of interest to you.
- Some of these Third Party Advertising Companies may be advertising networks that are members of the Network Advertising Initiative (“*NAI*”). If you would like more information about any NAI member company, or you would like to opt-out of targeted advertising from any NAI member company, click [here](#).
- We also use Third Party Service Providers to track and analyze NPII usage and volume statistical information from our Users to administer our Website and constantly improve its quality. We may also publish this information for promotional purposes or as a representative audience for Advertisers. Please note that this is not PII, only general summaries of the activities of our Users. Such data is collected on our behalf, and is owned and used by us.

7. RIGHTS REGARDING PERSONAL INFORMATION

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7.1 Statutory Rights

You have certain statutory rights concerning your personal information under applicable data privacy and protection laws and can exercise them by contacting us directly via email.

Access: You are entitled to ask us if we are processing your information and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it to check that we are lawfully processing it. We process a large quantity of information, and can thus request, in accordance with applicable data privacy laws, that before the information is delivered, you specify the information or processing activities to which your request relates.

Correction: You are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected. Further, LGO's Terms of Use and Service require you to promptly update your information if it changes in a material manner. You may update any of your PII by sending us an email at compliance@lgo.group. Please indicate what information you would like to update when you contact us.

Erasure: You are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims. However, because we keep track of past transactions, you cannot delete information associated with past transactions on the Website. Further, it may be impossible for us to completely delete all of your information because we periodically backup information.

Restriction: You are entitled to ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

Transfer: You may request the transfer of certain of your personal data to another party.

Objection: Where we are processing your personal data based on a legitimate interest (or those of a third party), you may challenge this. However we may be entitled to continue processing your information based on our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal data for direct marketing purposes.

Automated decisions: You may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.



You also have a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where you are habitually resident, where we are based, or where an alleged infringement of data protection law has taken place. In the U.K. you can make a complaint to the Information Commissioner's Office (Tel: 0044 1625 545 700 or at www.ico.org.uk).

7.2 Right to Opt out of Emails

As a condition of using the LGO Services, we will send you Administrative and Promotional emails:

- “Administrative Emails” relate to a User’s activity on the Website and LGO Platform, and include emails regarding a particular User’s account, requests or inquiries, and purchases of products and services. You cannot opt-out of Administrative Emails.
- “Promotional Emails” advertise our products and services, including exclusive sales and other offers, and/or the products and services of our Advertisers and Affiliates. In contrast to Administrative Emails, however, you do have a choice with respect to Promotional Emails.

If you do not want to receive Promotional Emails from us, you may elect to opt-out of receiving Promotional Emails at any time after registering by emailing us at support@lgo.group, by writing to us at the addresses contained herein, or by hitting the “unsubscribe” button at the bottom of any of our emails. When contacting us, please indicate your name, address, email address, and what Promotional Emails you do not want to receive.

8. SECURITY OF INFORMATION

We take security seriously and take numerous precautions to protect the security of personal information we collect and store.

We have the necessary and appropriate technical and organisational measures and procedures in place to ensure that your information remains secure at all times. Although, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. While we employ commercially reasonable security measures to protect data and seek to partner with companies which do the same, we cannot guarantee the security of any information transmitted to or from the Website, and are not responsible for the actions of any third parties that may receive any such information.

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We regularly train and raise awareness for all our employees to the importance of maintaining, safeguarding and respecting your personal information and privacy. We regard breaches of individuals' privacy very seriously and will impose appropriate disciplinary measures, including dismissal from employment. We have also appointed a LGO Data Protection Officer, to ensure that LGO manages and processes your personal information in compliance with the applicable privacy and data protection laws and regulations, and in accordance with this Policy.

9. RETENTION OF INFORMATION

LGO retains personal information for as long as necessary to fulfill the applicable legal and regulatory obligations, as well as fulfill the purposes of this Policy.

The criteria we may use to determine the retention period for certain categories of data includes:

- How long your LGO Account has been open;
- Whether there are contractual, legal or regulatory obligations that exist that require us to retain the data for a certain period of time;
- Whether there is any ongoing legal or financial claim that relates to your relationship with us;
- What the expectation for retention was at the time the data was provided to us; and
- In accordance with our record keeping obligations, we will retain LGO Account and other personal information obtained at the opening of the Account for at least five (5) years (and some up to ten years, as required by applicable law) after the LGO Account is closed.

We will not delete personal data if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

10. TRANSFERS OF PERSONAL INFORMATION

By using the LGO Services, you consent to your personal information being transferred to other countries, including countries that have differing levels of privacy and data protection laws than your country. In all such transfers, we will protect your personal information as described in this Privacy Notice, and ensure that appropriate information sharing contractual agreements are in place.

10.1 Transfers Outside of the European Economic Area and the United Kingdom

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LGO acts in accordance to personal information processing rules within the EEA and U.K, including GDPR and the U.K. Data Protection Act of 2018.

Data which we collect from you may be stored and processed in and transferred to countries outside of the EEA or UK. For example, this could occur if our servers are located in a country outside the EEA or U.K. or one of our service providers is situated in a country outside the EEA or U.K. We also share information with our group companies, some of which are located outside the EEA and U.K. These countries may not have data protection laws equivalent to those in force in the EEA and U.K.

If we transfer Data outside the EEA or U.K. in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy policy. You expressly agree to such transfers of data.

10.2 Transfers Outside the United States

LGO complies with the personal information processing rules of the E.U.-U.S. Privacy Shield.

If transfers of personal information are processed in the U.S., we may in some cases rely on applicable standard contractual clauses, binding corporate rules, and E.U.-U.S. Privacy Shield. Under the Privacy Shield, we are responsible for the processing of personal information we receive, collect, use, retain and subsequently transfer to a third party or business partner acting for or on our behalf. We are liable for ensuring that the third parties we engage support our Privacy Shield commitments. The U.S. Federal Trade Commission has regulatory enforcement authority over our processing of personal information received or transferred pursuant to Privacy Shield.

To learn more about the Privacy Shield, visit the U.S. Department of Commerce Privacy Shield Website at <https://www.privacyshield.gov>.

11. PRIVACY POLICIES OF THIRD PARTIES

This Policy only addresses the use and disclosure of information we collect from you on the LGO Website and through your use of the LGO Account and Services.

While we encourage Authorized Third-Party Service Providers to adopt and post privacy policies, the use of your PII by such parties is governed by the privacy policies of such parties and is not subject to our control. Other websites that may be accessible through this Website have their own privacy policies and data collection, use and disclosure practices. If you link to

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any such website, we urge you review the website's privacy policy. We are not responsible for the policies or practices of third parties.

12. MISCELLANEOUS

12.1 Privacy of Minors

We do not knowingly collect personal information from anyone under the age of 18, and no part of the Website is designed to attract anyone under the age of 18.

12.2 Notice of Privacy Rights to California Residents

California law requires that we provide you with a summary of your privacy rights and the categories of PII that we collect about you for direct marketing purposes. California law requires us to inform you, at your request: (1) the categories of PII we collect and what third parties we share that information with for direct marketing purposes; (2) the names and addresses of those third parties; and (3) examples of the products marketed by those companies.

Effective January 1, 2020, pursuant to the California Consumer Privacy Act of 2018 (“**CCPA**”), California residents have certain rights in relation to their personal information, subject to certain exceptions. Any terms defined in the CCPA have the same meaning when used in this California Privacy Rights section.

For personal information collected by us during the preceding 12 months that is not otherwise subject to an exception, California residents have the right to access and delete their personal information. We must also allow you to control who you do not want us to share that information with. We will not discriminate against those who exercise their rights. Specifically, if you exercise your rights, we will not deny you services, charge you different prices for services or provide you a different level or quality of services.

To obtain this information, please send a request by email. Please allow thirty (30) days for a response. Also, please note that there is no charge for controlling the sharing of your PII or requesting this notice.

If you are a California resident, you may designate an authorized agent to make a request to access or a request to delete on your behalf. We will respond to your authorized agent's request if they submit proof that they are registered with the California Secretary of State to be able to act on your behalf, or submit evidence you have provided them with power of attorney pursuant to California Probate Code section 4000 to 4465. We may deny requests from authorized agents



who do not submit proof that they have been authorized by you to act on their behalf, or are unable to verify their identity.

13. CONTACT

If you have any questions about our privacy policy, please email compliance@lgo.group.