

PRIVACY POLICY





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1. OVERVIEW

Digital Wires EooD, operating under the trading name “Liondom”, is a distinguished crypto exchange company, duly registered under number 207619733 and regulated by The Bulgarian National Revenue Agency. Holding a valid license number BB-217 for provision of crypto exchange and wallet services, our company specializes in providing secure and efficient services for the conversion of digital currencies to FIAT Currencies. As a dedicated transaction facilitator, Liondom EooD ensures a seamless and reliable platform for our valued clients in the ever-evolving world of cryptocurrency.

Company Information:

Data Processor: Digital Wires EooD

Company Code: 207619733

Address: 9 Anna Ahmatova Str, Sofia, 1729, Bulgaria.

Regulatory Authority: The Bulgarian National Revenue Agency

License Number: BB-217 for provision of crypto exchange and wallet services

This Privacy Policy pertains to Liondom (referred to as "we," "our," "us," or "Data Processor") and outlines the purposes and legal grounds for the collection, processing, and sharing of personal data provided by you or gathered by us. It is applicable whenever you access our content and/or services, irrespective of the device used.

We are dedicated to adhering to relevant laws and regulations in Bulgaria, along with guidelines from regulatory authorities. Adequate technical and administrative measures have been implemented to protect collected data from loss, unauthorized access, and alteration. Data retention is limited to necessary periods. Our employees are bound by written agreements, refraining from disclosing accessed information to third parties, including details about website/social media account visitors.

Individuals below the age of 16 must refrain from providing personal data on our website/social media accounts. Persons under 16, must secure parental or guardian approval before providing personal information.

The definitions used in this Privacy Policy are in line with the General Data Protection Regulation No 2016/679 (EU).



Please thoroughly examine this Privacy Policy. By accessing our website <http://www.liondom.com/>, you are consenting to abide by the terms specified herein. If you do not agree with these terms, kindly refrain from visiting our website or utilizing our content and/or services.

2. COLLECTION METHODS FOR YOUR INFORMATION

2.1. Information Supplied by You

This includes data directly provided by you and information provided by individuals connected to you, your business, or those representing you.

When applying for our products and services, you may provide personal data by filling out registration forms, submitting required documents for service provision, and similar activities.

- When registering on our website or installing our applications.
- Communication through emails, letters, or telephone discussions, including recorded calls.
- Subscriptions to our newsletters or enrolment for other communications.
- Involvement in surveys.

We may collect your personal information if you are affiliated with our clients or potential clients who are legal entities. In these cases, your roles may include positions such as company director, shareholder, board member, ultimate beneficial owner (UBO), or authorized company representative.

2.2. Automatically Collected Data

This regards information collected concerning your engagement with our services and account-related activities.

- Information concerning your website usage (obtained through the use of cookies and similar technologies).
- Inquiries made through our registration system or social media accounts.
- Details related to payments and transactions.

In certain situations, we may obtain information from third parties and extract data from publicly accessible sources, such as your LinkedIn profile, Facebook, Twitter, Instagram, your company's website, or other similar sources. Our partners and marketing agencies may also share such information. We may combine this data with the information you provide and details obtained from or about you through other sources.



2.3. Additionally, we may gather information about you in contexts not explicitly covered in this Privacy Policy. In such instances, we will provide you with additional notification.

3. DATA PROCESSING PURPOSES AND LEGAL FOUNDATIONS

3.1. To reduce the extent of information gathered, we have outlined the purposes for processing your personal data, the corresponding legal bases, and the specific personal data collected for each purpose in the table below:

Purpose	Legal Basis/Bases	Personal Data
Providing digital currency to fiat exchange services and digital currency wallet services.	<ul style="list-style-type: none"> - Fulfilment of contractual obligations between you and us. - Adherence to legislative mandates; - Our legitimate interests; - Your explicit consent. - For AML/KYC checks 	Name, surname, details about payments to and from your accounts with us, payment method, credit card number, address, passport number, credit card expiration date, details about the products or services we provide you, other information we may need in providing our services to you, such as your phone number or email address to which we will send your registration confirmation, information about your interests and preferences. Information such as trade identifiers, payment methods, personal details of buyers and sellers, trade currency and volumes, trade timing and terms, cryptocurrency-related data, transactions, blockchain operations, transaction identifiers, deposit addresses, digital currency amounts, timestamps, and similar details are gathered from users' Liondom Wallets.
To provide service-related information you request.	<ul style="list-style-type: none"> - Our legitimate interest to provide you with accurate information about our services, extra services, etc.; - Your consent; 	Inquiries through phone, email, social media, or other means, where we might require your phone number, email address, or other convenient contact details.



Purpose	Legal Basis/Bases	Personal Data
	<ul style="list-style-type: none"> - Obligations under a contract between you and us. 	
<p>For marketing purposes, including customized advertisements, sponsored content, and promotional communications.</p>	<ul style="list-style-type: none"> - Legitimate interest to inform about our services, events, news, and other relevant information; - Additional explicit consent, obtained (e.g., through an additional tick box linked to the Privacy Policy and/or other relevant documents) prior to processing personal data for marketing purposes. 	<p>Name, social media account details, telephone number, email address, your interests.</p>
<p>Assessment and analysis of market, clients, products, and services, including surveys.</p>	<ul style="list-style-type: none"> - Legitimate interest in improving services, developing content and products, and ensuring website security; - Your consent. 	<p>IP address, device operating system version and settings, login session time and duration, search query terms, cookie information, GPS signal or nearby WiFi access point data when using our website content.</p>
<p>Conversation recording for service quality, transaction preservation, and handling of complaints, requests, or notifications.</p>	<ul style="list-style-type: none"> - Consent received during conversation continuation. 	<p>Phone number, name, surname, call date, start and end times, conversation content.</p>
<p>To protect our interests in legal proceedings.</p>	<ul style="list-style-type: none"> - Compliance with legislative requirements; - Legitimate interest in defense against lawsuits and claims. 	<p>Relevant personal data as stated in this Privacy Policy based on the lawsuit or claim.</p>

Marketing Communications: If you prefer not to receive our direct marketing communications, you can opt out at any time. Simply notify us by sending an email to support@liondom.com or using the opt-out link provided in our newsletters.



Recording Conversations: If you are not comfortable with your conversations being recorded, alternative contact methods with Liondom are available. You can reach out via email at support@liondom.com.

In situations where our utilization of your information deviates from the previously mentioned legal bases, we will request your consent before proceeding with the processing. Such instances will be apparent from the circumstances and context surrounding them.

On occasion, we may employ your information for purposes beyond those previously described. In such situations, we will provide you with an additional notice.

You have the right to refrain from providing certain information to us, such as details requested in the registration form. However, exercising this choice may have consequences. It could hinder your ability to complete registration on our website or access our services. Additionally, it might affect our capacity to administer your accounts or policies and could potentially lead to the cancellation of a product or service you have with us.

3.2. For Clients located in the EU, this section is applicable.

In compliance with the General Data Protection Regulation (GDPR), we are obligated to clarify the valid legal bases upon which we rely to process your personal information. Therefore, we may depend on the following legal bases for the processing of your personal information:

- **Consent:** We may process your information if you have granted us permission (i.e., consent) to use your personal information for a specific purpose. You have the right to withdraw your consent at any time.
- **Legal Obligations:** We may process your information when we believe it is necessary to fulfill our legal obligations, such as cooperating with law enforcement bodies or regulatory agencies, exercising or defending our legal rights, or disclosing your information as evidence in litigation in which we are involved.
- **Vital Interests:** We may process your information when we deem it necessary to protect your vital interests or the vital interests of a third party, particularly in situations involving potential threats to the safety of any person.

4. RETENTION PERIOD FOR YOUR PERSONAL DATA

We will store your personal data for the time necessary to fulfil the initial purpose for which they were collected. Afterward, we will delete the data, unless legal obligations mandate information retention for tax reasons or potential pre-trial investigations. However, the retention duration will not surpass 5 years following the conclusion of your client relationship. At the conclusion of this timeframe, the data will be permanently removed.



Typically, the storage periods for personal data are as follows:

Personal Data	Retention Period
Payment data	At least 5 years after the payment transaction.
Cryptocurrency transactions data	5 years after you cease being a client. Blockchain transactions data will remain publicly available.
Personal data used for service provision	5 years after you cease being a client.
Personal data used for marketing purposes	3 years from your most recent visit to our website.
IT system logs	Typically, for a span of several months.
Analytical data	This data is routinely collected during website visits and is instantly anonymized/aggregated.
Personal Data	Retention Period
Conversation records	Kept for up to 3 years from the date of recording.
Correspondence with clients	Retained for 5 years after the termination of your client relationship.
Complaints	Maintained for a maximum of 10 years.

Please bear in mind that these retention periods are subject to the nature of the data and the respective legal requirements.

5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may (or are obligated to) share your personal data with external entities, including:

- Companies that provide essential services necessary for us to offer our services to you or comply with legal obligations.
- Banks facilitating transactions.
- Public authorities, regulatory bodies overseeing payment sector activities, pre-trial investigation officials, courts, and similar parties when it is necessary to safeguard our legitimate interests or when legal obligations mandate disclosure.

This practice allows us to deliver products, services, and manage business operations while ensuring compliance with relevant regulations. We also involve various data processors for personal data processing, as outlined in this Privacy Policy, encompassing but not limited to data centers, cloud service providers, website administration, marketing services, software development, IT infrastructure services, and communication services.



6. TRANSFER OF YOUR PERSONAL DATA ACROSS BORDERS

In certain instances, it may be necessary for us to transfer your personal data to countries where data protection standards might not be as rigorous. Nevertheless, we take comprehensive measures to ensure the security of data during these transfers.

The Data Processor transfers your personal data to countries outside the European Economic Area. To guarantee the safety of such transfers, we employ any of the following safeguards:

- Entering into contracts with data recipients based on the standard contractual clauses adopted by the European Commission.
- Implementing binding corporate rules for data transmission within corporate groups.
- Collaborating with data recipients situated in countries recognized by the European Commission as maintaining adequate data protection standards.

7. SAFEGUARDING YOUR INFORMATION

We have put in place practical and appropriate physical and technical measures to safeguard the information collected in relation to our content and services. It is important to acknowledge, however, that despite our diligent efforts to protect your data, no website, internet transmission, computer system, or wireless connection can provide absolute security.

8. YOUR RIGHTS

The individual whose data is processed in connection with activities conducted by the Data Processor has the following rights based on their specific circumstances:

8.1. Right to Information (Right to Know)

You have the right to receive clear and straightforward information, presented in plain language, before your personal data undergoes processing.

8.2. Right of Access

This right includes:

- Confirming whether we process personal data pertaining to you.
- Providing a list of your processed data.
- Providing details about processing methods, purposes, and legal bases.



- Verifying whether we transfer data to third parties and outlining implemented safeguards.
- Disclosing the source of your personal data.
- Informing you about profiling activities.
- Sharing information regarding storage duration. After confirming your identity, we will provide the aforementioned information, ensuring it does not infringe upon the rights and freedoms of others.

8.3. Right to Rectification

You have the authority to rectify or supplement your personal data if it is inaccurate or incomplete, taking into account the purpose of processing.

8.4. Right to Erasure (Right to be Forgotten)

Applicable when:

- The information we possess is no longer necessary for its original purpose.
- You withdraw your previously given consent for processing.
- Your individual interests outweigh our legitimate interests after you object.
- The information was unlawfully processed.

8.5. Right to Suspension of Processing (excluding storage)

Temporary halt to data processing (excluding storage) while investigating your case if:

- You dispute the accuracy of information.
- You object to processing based on legitimate interests.
- Our processing of your information is unlawful, and you oppose erasure.
- The information is no longer required, but you need it for legal reasons.

8.6. Right to Restriction of Processing

You can opt out of us using your personal data for direct marketing purposes.

8.7. Right to Object

You can object to the processing of personal data based on public interest tasks, legitimate interests, or third-party pursuits at any time. We must present compelling legitimate grounds that outweigh your interests, rights, and freedoms.



8.8. Right to Data Portability

This right can be exercised if you have provided your data to us, and processing is automated based on your consent or contractual obligations.

We offer user-friendly channels to exercise these rights, which include contacting us by emailing us at support@liondom.com, or using specific links provided in our promotional communications.

There may be instances where you cannot exercise these rights due to legal requirements related to crime prevention, investigation, detection, protection of official or professional ethical standards, or safeguarding the rights and freedoms of yourself or others.

9. POLICY UPDATES

The privacy notice may undergo periodic updates. An updated version will be identified by a revised "Revised" date, and its effectiveness will commence upon accessibility. In the event of substantial modifications to this privacy notice, notification may be provided by prominently posting a notice of the changes or directly notifying the individual. Regular review of this privacy notice is encouraged to stay informed about the measures taken to protect one's information.

10. CONTACT US

If you come across any inconsistencies in this Privacy Policy, encounter security concerns on our website, or have inquiries regarding the processing of your personal data, we encourage you to reach out to us using the contact details provided below:

Mailing Address: 9 Anna Ahmatova Str, Sofia, 1729, Bulgaria.
E-mail: support@liondom.com

We value your feedback and take your concerns seriously. Our dedicated team is committed to addressing any issues promptly and ensuring a secure and transparent experience for our users.