

WhiteEx Website Privacy Policy

1. General information.

This Privacy Policy applies when you use WhiteEx Website <https://whiteex.com/> (“WhiteEx”, “Website”, “Us”, “We”, or “Our”), contact WhiteEx, engage with WhiteEx on social media, or otherwise interact with WhiteEx.

This Privacy Policy sets the frames of collection, storage, usage, maintenance, disclosure, and elimination (the "**Processing**") of the Personal Information WhiteEx receives and collects. We may change and update this Privacy Policy from time to time to reflect changes to WhiteEx information collection, usage, and storage practices.

We respect your privacy and are committed to protecting your Personal Information. This Privacy Policy helps explain how We collect, use, store, and protect your information when you use the Website or any other websites, pages, features, or content related to the WhiteEx and indicates the privacy rights of the users.

By using Our Website, WhiteEx assumes that you agree to the collection and use of information in accordance with this Privacy Policy and agree to provide to Us an explicit consent to terms and the data practices described in this Privacy Policy including the processing, storage, and usage of your Personal Information.

2. Personal Information collection.

WhiteEx gathers certain personal information and data when you use Our Website ("**Personal Information**").

You may refuse to provide such Personal Information and/or decide to give WhiteEx any other non-required data. In case you refuse to provide to WhiteEx your Personal Information, you may not be able to access or use all of the features of Our Website.

Except as described in this Privacy Policy, We will not sell, lease, rent or loan your Personal Information to any third party without your prior consent.

While providing access Our Website WhiteEx may collect the following Personal Information from you:

- “**Personal Information**” such as name, email, contact details or any other personal content that you provide to Us whether through a form or field on our Website or any other communication (e.g. email, phone, post, etc.).
- “**Technical Information**” such as browser type, operating system, device type, IP address, and other similar technical information received from a browser or device automatically when visiting or interacting with Our Website. This may include the referring URL that led you to Our Website.
- “**Usage Information**” such as the pages you visited on Our Website, where you clicked, searches performed on Our Website and other similar information related to how you have used Our Website. It

may also include information related to whether you receive, opened or clicked on any links in an email sent to you.

- **“Cookies Data”** - as described in Section 6 of this Privacy Policy.
- **“Customer Support”** - We may collect any additional information you disclose to our customer support team.

When you visit Our Website, WhiteEx automatically collects the Personal Information sent to WhiteEx by your computer, mobile phone, or other access devices. WhiteEx collects information that your browser sends whenever you visit a Website ("**Log Data**").

This Personal Information may include:

- your IP address;
- device information including, but not limited to, identifier, name, and type, operating system;
- mobile network information;
- standard web log information, such as your browser type, browser version and the pages you accessed on the Website, access times, website navigation paths, unique device identifiers and other diagnostic data.

This service usage data helps WhiteEx systems to ensure that Our Website is accessible for users across all platforms and can aid in case of disputes or technical issues. You agree to provide the Personal Information specified herein and agree that your provided Personal Information may be processed and stored by WhiteEx.

The components of Personal Information mentioned above may be modified from time to time according to the Applicable law and WhiteEx necessities that will be reflected in this Privacy Policy. WhiteEx will not collect any other Personal Information except for the mentioned herein until WhiteEx amends and posts these amendments to this Privacy Policy on the Website.

3. Purposes of collection.

WhiteEx only collects the Personal Information that is reasonably necessary for WhiteEx to efficiently conduct its activities, that are as follows:

- ***to maintain and improve Our Website.*** WhiteEx uses Personal Information to ensure that Our Website functions properly. We process your Personal Information to provide a personalized experience, and implement the preferences you request;
- ***to provide quality control.*** We process your Personal Information for quality control and staff training to make sure We continue to provide you with accurate information. If We do not process Personal Information for quality control purposes, you may experience issues or other interruptions.
- ***to research and development purposes.*** We process your Personal Information to better understand you and the way you use and interact with Our Website. In addition, We use such information to customize, measure, and improve the content and layout of Our Website and other applications, and to develop new services. Without such processing, We cannot ensure your continued enjoyment of Our Website.

- ***to engage in marketing and advertising activities.*** Based on your communication preferences, We may send you marketing and advertising communications to inform you about relevant product offers and services, to deliver targeted marketing and to provide you with promotional offers based on your communication preferences. We use information about your usage of Our Website and your contact information to provide marketing communications. You can opt-out of Our marketing communications at any time. From time to time We may request your permission to allow Us to share your Personal Information with third parties for such purposes, as described in this Privacy Policy. You may also opt-out of having your Personal Information shared with third parties, or from allowing Us to use your Personal Information for any purpose that is incompatible with the purposes for which We originally collected it or subsequently obtained your authorization.
- ***to process your inquiries and to respond to your requests.*** For example, when you contact us to learn more about our products or services or when you request to receive certain materials from us (e.g. white papers, research papers, product and services information).
- ***to send you information related to Our services and products*** that We believe may interest you, such as newsletters or product and service updates. Such communications will be sent to you when you have chosen to receive such communication or when We have a legitimate interest to market our products and services. In any event, you will always be able to opt-out of receiving such communications. Opting out may be done directly in the communication received
- ***in our legitimate interest*** to prevent fraud or harm to Us or to any third party, and to ensure the security of our network and services.
- where it is necessary for WhiteEx to ***comply with its legal obligations*** and to exercise and enforce its legal rights.

We may also use certain third-party marketing and advertising networks to help us market our products on our own website and on third-party websites (e.g. remarketing ads across the Internet by Google or Facebook).

4. Regulation.

WhiteEx Website Privacy Policy includes the provisions of the EU General Data Protection Regulation (GDPR), California Consumers Protection Act 2018 (CCPA), Directive on privacy and electronic communications (ePrivacy Directive) and other applicable data protection laws (“**Data Protection Regulation**”), and corresponds to them and also operates within the framework of existing legislation.

You have the following rights under the above-mentioned regulations:

- ***Right to withdraw*** - you have the right to withdraw your consent where you have previously given your consent to the processing of your Personal Information;
- ***Right to object*** - you have the right to object to the processing of your Personal Information if the processing is carried out on a legal basis other than consent.
- ***Right to be informed*** - you can ask WhiteEx what categories of your Personal Information is being collected;
- ***Right to opt-out*** - you can ask WhiteEx to stop using your Personal Information for business and other benefits;
- ***Right to erasure ('right to be forgotten')*** - you can ask WhiteEx to delete your Personal Information;
- ***Right of access*** - you can ask WhiteEx to provide the list of actual Personal Information values collected;

- **Right to non-discrimination** - WhiteEx provides equal services, meaning they cannot discriminate against your rights;
- **Right to rectification** - you can ask WhiteEx to correct your Personal Information in a situation when such data available to Us or disclosed to third parties is inaccurate or incomplete;
- **Right to restrict** - you can ask WhiteEx to introduce the restriction regime on the processing of your Personal Information, so that in each case the data may be processed only upon separate consent from you.
- **Right to data portability** - if We process your Personal Information based on your consent, or the processing is carried out by automated means, you may request to receive your Personal Information in a structured, commonly used and machine-readable format, and to have Us transfer your Personal Information directly to another Controller, where technically feasible unless the exercise of this right adversely affects the rights and freedoms of others. (Controller is a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of your Personal Information).
- **Right to lodge a complaint** - if you believe that we have infringed your rights, We encourage you to contact us first at whiteex_card@gmail.com so that We can try to resolve your issue or dispute informally. You also have a right to lodge a complaint with a competent supervisory authority.
- **Storage of your personal information** - We will try to limit the storage of your Personal Information to the extent that storage is necessary to serve the purpose(s) for which the Personal Information was processed, to resolve disputes, enforce our agreements, and as required or permitted by law.

To exercise any of these rights, please contact WhiteEx at whiteex_card@gmail.com WhiteEx will respond to your request within a reasonable timeframe and notify you of the actions taken.

You can withdraw your consent for your Personal Information processing at any time and ask Us to stop access, storage, usage and other processing of your Personal Information if you believe that WhiteEx doesn't have the proper rights to do so. Withdrawing your consent will not affect the lawfulness of any processing WhiteEx conducted prior to your withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

You have the right to request information from Us regarding the manner in which We share certain categories of your Personal Information with third parties for third parties direct marketing purposes. California law provides that you have the right to submit a request to Us at Our designated address and receive the following information:

- the categories of information We disclosed to third parties for the third parties direct marketing purposes during the preceding calendar year;
- the names and addresses of third parties that received such information, or if the nature of their business cannot be determined from the name, then examples of the products or services marketed.

You are entitled to receive a copy of this information in a standardized format and the information will not be specific to you individually. You may make such a request by emailing Us at whiteex_card@gmail.com.

5. Personal Information WhiteEx does not process.

WhiteEx does not collect or store any Personal Information about children under 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your children have provided Us with Personal Information, please contact us. If We become aware that We have collected Personal Information from children without verification of parental consent, We take steps to remove that information.

WhiteEx also does not process any **Sensitive Personal Information**, such as racial or ethnic origin, membership in political parties or political opinions, religious or philosophical beliefs, trade union membership, genetic/biometric data, health, sex life or sexual orientation. Nor do we collect any information about criminal convictions and offenses.

If you believe that WhiteEx has collected such information, please directly contact Us immediately at whiteex_card@gmail.com in order to delete this information and resolve issues.

6. Cookie Policy.

When You access Our Website WhiteEx (or Google Analytics or a similar service provider on WhiteEx's behalf) may place cookies on your computer or other devices.

A cookie is a small text file that is sent to and stored on your computer or other internet-connected devices to identify your browser or store information. They are widely used in order to make websites work, or work in a better, more efficient way. The information WhiteEx obtains through the use of Cookies may include information about your computer, device, and browser, such as your IP address, browser, operating system and device characteristics, language preferences, mobile device or advertising ID, referring URLs and others.

Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Website.

Examples of Cookies We use:

- **Session Cookies.** We use Session Cookies to operate Our Website.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

If you access Our Website from a mobile or other devices, WhiteEx may collect information for that device such as a unique device identifier ("UDID").

WhiteEx uses these technologies to recognize you as Our Website user, customize Website, understand usage and determine the effectiveness of email marketing campaigns, measure promotional effectiveness and collect information about your computer or another access device to mitigate risk, help prevent fraud, and promote trust and safety.

You may adjust your browser to reject all cookies or to indicate when a cookie could be sent. WhiteEx requests you to provide explicit consent to use cookies. However, if you do not accept cookies, you may not be able to use all of the features and services provided by the Website in a full manner.

7. Security.

WhiteEx protects your Personal Information under internationally acknowledged standards, using physical, technical, and administrative security measures to protect the privacy of the information you provide to WhiteEx from unauthorized or accidental access, loss, misuse, disclosure, alteration, destruction as well as from other illegal actions of third-parties.

WhiteEx has also implemented a number of security and technical measures to ensure that your information is protected and securely maintained such as encryption, data storage diversification, internal data access restrictions, anonymization technology, data and asset diversification, and strict physical access controls to buildings & files.

Please note that transmission of information (including communications by email) over the Internet or other publicly accessible networks is not one hundred percent secure, no method of transmission over the Internet is totally secure.

Also, please note that WhiteEx is not liable for the security of any information you are transmitted to Us or received from Us by Internet or wireless connection, including email, phone, or other means of communication since We have no way of protecting that information once it leaves and until it reaches Us. While We strive to use commercially acceptable means to protect your Personal Information, We cannot guarantee its absolute security.

You should also understand the responsibility and take safety precautions to protect your own Personal Information.

If you have any suspicions that your Personal Information has been put in jeopardy, or at any risk, particularly your account, password and/or other information, please make sure to contact Us as soon as possible at whiteex_card@gmail.com.

8. Personal Information sharing.

WhiteEx may disclose information about you:

- to the extent required by law such as to comply with court orders, search warrants, regulatory orders, subpoenas, and other lawful requests by public authorities, including to meet national security or law enforcement requirements;
- to protect the personal safety of users of Our Website or the public;
- in connection with any legal proceedings or prospective legal proceedings;
- to establish, exercise or defend WhiteEx's legal rights;
- to third parties that help Us operate Our Website (e.g. server hosting providers, business management and email distribution service providers and other similar service providers). These companies are authorized to use your personal information only as necessary to provide these services to Us;
- to legal authorities, consultants, advisors or service providers when required to investigate, respond to, or prevent, fraud; or when required to ensure the security of our network and services and protect the safety of WhiteEx or the public;
- to WhiteEx resellers, agents, partners or service providers acting on Our behalf in connection with the offering of WhiteEx's products or services.
- to third-party marketing and advertising networks to help Us market Our products on Our own website and on third-party websites (e.g. remarketing ads across the Internet by Google).

As part of providing these services, WhiteEx will share part of your Personal Information with such companies, for example: Google services – analytics, Facebook Inc. services - visitor action pixels, Cloud services/server services, etc.

- Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of Our Website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity with Our Website available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents Google Analytics JavaScript from sharing information with Google Analytics about visits activity. For more information on the privacy

practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

- We use the “visitor action pixels” from Facebook Inc (*1 Hacker Way, Menlo Park, CA 94025, USA, or, if you are based in the EU or Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (“Facebook”)*) on Our Website. This allows Us to track your behavior after you have been redirected to the Website by clicking on a Facebook ad. This enables Us to measure the effectiveness of Facebook ads for statistical and market research purposes. The Personal Information and data in this way are anonymous to Us, i.e. we do not see the Personal Information of an individual. However, this Personal Information is stored and processed by Facebook, which is why We are informing you, based on our knowledge of the situation. Facebook may link this information to your Facebook account and also use it for its own promotional purposes, in accordance with Facebook’s Data Usage Policy <https://www.facebook.com/about/privacy>. You can allow Facebook and its partners to place ads on and off Facebook. A cookie may also be stored on your computer for these purposes. The legal basis for the use of this service is GDPR. You can object to the collection of your Personal Information by Facebook pixel, or to the use of your Personal Information for the purpose of displaying Facebook ads by contacting Facebook directly. We guarantee the adequacy of data transfer to the third country USA through the agreement of EU standard contractual clauses.

In some circumstances, WhiteEx will anonymize your Personal Information (so that it can no longer be associated with you) for research or statistical purposes, in which case We may use this information indefinitely without further notice to you.

9. International Data Transfer.

If you are located in the EU, make a notice that your Personal Information may be transferred to countries that are not part of the EU.

WhiteEx will take additional measures in order to establish that your Personal Information is treated just as safely and securely as it would be within the European Union and under the Data Protection Legislation as follows:

- choosing only partners and services that are compliant with the EU standards;
- limiting access to your Personal Information to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, your personal data) including notifying you and the governing authority where WhiteEx is legally required to do so.

Your Personal Information may also be transferred to - and maintained on - computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

WhiteEx will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Some of Our external third parties are based outside of the European Economic Area (EEA) so their processing of your Personal Information will involve a transfer of data outside the EEA.

Once We transfer your Personal Information outside the EEA, We shall observe the criteria set within the EEA.

For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries: (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

Where We share Personal Information with fraud and crime prevention agencies and fraud and/or criminal history checking service providers in the EEA, they may transfer your Personal Information outside of the EEA, in this case they impose contractual obligations on the recipients of that data to protect your Personal Information to the standard required in the EEA and/or they may require the recipient to subscribe to certain standards, intended to enable secure data sharing.

Whenever We transfer your Personal Information out of your country, We also ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Information to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where We use certain service providers, WhiteEx may use specific contracts approved by the European Commission which give Personal Information the same protection it has in Europe.
- Where We use providers based in the US, WhiteEx may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to Personal Information shared between Europe and the US.

Please contact Us at whiteex_card@gmail.com if you want further information on the specific mechanism used by Us when transferring your personal data out of the EEA.

10. Personal Information retention.

WhiteEx will only retain your Personal Information for as long as reasonably necessary to fulfil the purposes for its collection, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

WhiteEx will not keep your Personal Information for any longer than is necessary for the scope of the reason(s) for which it was collected.

Your Personal Information will be stored according to the following factors which determine the period of how long it will be kept:

- WhiteEx objectives and requirements;
- the types of Personal Information in question;
- the purposes for which Personal Information in question is collected, held and processed;
- WhiteEx legal basis for collecting, holding and processing that Personal Information;
- any legal obligation to store such information.
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WhiteEx ensures that Personal Information kept is regularly reviewed against such criteria to assess whether it should be kept any longer.

11. Privacy Policy changes.

This Privacy Policy is effective as of the date of publishing on this Website and will remain in effect except with respect to any changes in its provisions in the future, that come into force and will be applied immediately after they are published on the Website.

WhiteEx may update and/or change the terms of this Privacy Policy, and WhiteEx will notify you by revising the date at the top of this policy and, in some cases, WhiteEx may provide you with additional notice such as adding a statement to Website by emailing you directly prior to these changes taking effect, so that you aware of the type of Personal Information WhiteEx collects, proceeds and storages, and how it will be used, and under what circumstances, if any, WhiteEx may disclose such information.

This Privacy Policy was last updated on the 26 of July 2022.

12. Miscellaneous

Our Website may contain links to other websites that are not operated by Us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every website you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

13. Contact details.

Should you have any questions about this Privacy Policy, the practices of Our Website, or your dealings with Our Website, please contact WhiteEx.

You may send an email at whiteex_card@gmail.com.