

PROCESSING AND PROTECTION OF PERSONAL DATA

Security of your personal data is very important for us

If you are our client or a website visitor you entrust your personal data to us. Please learn about the ways of protecting personal data, the principles and rights you have with regards to GDPR (**General Data Protection Regulation**).

Who is the administrator?

We are GLOBAL COMMODITY INVESTMENTS LLC, based 8020 Excelsior Dr., Suite 200, Madison, WI 53717, USA, ID: G051415, and we operate websites glocin.com, glocin.biz and a web based customer portal miner.glocin.biz.

We administrate your personal data by determining what way it is processed, for what kind of reasons and for how long. We also decide who may become a sub-processor of the data.

How to contact us?

Any time you need to approach us, please use the email address: support@glocin.biz.

We would like to state

We would like to state that „as an administrator of your personal data we conform to all the legislative duties, namely the law concerning General Data Protection Regulation (GDPR), from which follows that:

- We will process your personal data only on the basis of the valid legal regulation and for a justified reason in the first place; we will also process your personal data in order to perform a contract or because of a legal obligation or authorisation.
- In accordance with the article no. 13 GDPR we observe the duty as far as providing information before the commencement of the personal data processing.



- Feel encouraged to be able to exercise and perform your rights according to GDPR.

Scope of personal data and purposes of processing

The personal data that we are entrusted with will be processed for the following reasons and to the extent needed for the following purposes:

- **Providing services and performance of the contract**

You provide your personal data: name, surname, permanent address, e-mail, telephone number and companies provide the name of the company and their ID. All this is essential to perform a contract with regard to the rent of particular blocks of computing power, or, if applicable, to ensure any other orders that are placed.

- **Managing accounting**

If you are our customers, your personal data (name, surname, permanent address, and in case of companies the company name and ID) are definitely necessary to be submitted for us to be able to conform to the legal obligations to draw up and keep the record of tax documents.

- **Marketing**

Your personal data (name, e-mail and telephone number) are used for the purposes of direct marketing, or eventually to provide commercial communication in future. If you are our customer, then we feel entitled to do so, as we presume you may be interested in our services. We keep doing this for the period of 5 years since the last registration. If you are not our customer, then you will obtain the commercial information only on the basis of your consent, that is for the period of 5 years since the date of getting consent.

Respectively, you may give us your consent to process your personal data for the internal marketing purposes of various kind. This means that we will process your personal data only within our GLOCIN project to be able to notify you in advance and send important corporate messages. We will display the sources of direct and extra commissions, and display the customer tree to provide a customer with information and to enable them to manage the business structure.

- We are given the consent for the period of 5 years and it is possible to opt out any time or to give consent again using your customer profile in the GLOCIN website.
- When verifying your accounts (checking your personal data) in the customer portal, we use the scan of your identity card (or a passport) that was provided to us by you, and the scan is deleted immediately after verification. Changes of your personal data are filed in archives to be used only in justified cases, which is regulated by



law. Registration of the data, that are not confirmed by email, are automatically deleted from the customer website within 48 hours since they were submitted. If a registered customer gives a consent to process his personal data, but he never makes any purchase and never sends any money to the customer account in the GLOCIN portal, then his personal data will be totally deleted after 90 days since the customer provided them. His personal account will be erased as well.

- **Photography and video recording taken in the workshops**

During some events, such as workshops or seminars, photography or video recordings are made. Some photographs may be used for promotion, especially on the website or in printed materials. Video recording is meant to serve the participants. There are no names mentioned with the exception of references, and this is done only with the previous consent of the individual. If somebody does not want to be recorded, please let us know before taking part in an event like this.

- Your personal data are filed when you register for the events directly in GLOCIN portal in the „Events“ section.
- In other cases of processing personal data the data are filed in the course of a limitation period, unless a longer period is specified by law or in particular cases when we state otherwise.

Security and protection of personal data

Personal data are protected in the best possible way by the means of modern technologies corresponding to the level of technical development. They are protected as if they were our own. We have adopted all possible up-to-date technical and managerial measures that should prevent misuse, damage or destruction of your personal data. As it is necessary to protect data, especially personal data, we have decided to update security settings and consequently to change some of the security elements in the following way:

1. Length of the password should be minimum 10 characters and it should contain at least one capital and one small letter, a number and a punctuation mark (eg. full stop, comma, apostrophy....).
2. When signing in or sending transactions a customer will be strictly required to authorize it in two steps. Customers who do not activate the access to the portal will be denied until they do so. We are sorry for any inconvenience, but we have to apply any possible measures to prevent misuse of personal data.



Our company makes an endeavour to ensure maximum security and thus prevent the company against pertinent legal sanctions by supervisory bodies.

After the regulations GDPR enter into force every customer shall fill in his/her permanent address. This is another essential change taking place in the customer portal, and it is designed to prevent money laundering. Without submitting of the address the portal will be closed for the customer, and he/she will not be able to make a purchase, transfer funds or exchange crypto currency.

Transferring personal data to other recipients

Our employees and associates who have access to your data are bound by the confidentiality principle. They are trained in the area of security of processing data and know how to safeguard our clients' interests. We are not allowed and we do not make personal data available to any third parties, with the exception of subcontracting particular processing operations when unable to perform the services ourselves. We use services and applications of the data processors who specialize in the particular area and conform to GDPR regulations.

This is a list of the providers of the following services and platforms:

GLOCIN LIMITED – application for communication, web services and invoicing

BAJS PARTNERS LTD – accounting company

BIT.NXT INTERNATIONAL LLC and its subsidiaries – data centres

GOLD AGENT s.r.o. – receiving payments, financial services

Google - Google Analytics

Facebook Pixel

It is possible that in future we will decide to use other applications or processors to improve processing. We promise to impose at least the same requirements on processors in terms of security and quality of processing just in the same way as we expect them of ourselves.

Cookies

When a customer is browsing our website, we record his IP address, we know how long he remains on the particular page, which website he had visited before and we also know if he comes thanks to one of our affiliate partners. As a provider we feel



authorised to use cookies to count visits on our website, to get to know about affiliates and to customize your website views. Customizing of our website is our duty as we believe that in such a way we can offer better services.

Cookies designed for targeting commercials will be processed only on the basis of your consent.

Our websites can also be browsed in a mode that does not allow for the collection of personal data. The use of cookies can be disabled on your computer.

What kind of company is asked to process data?

Google Analytics, operated by Google Inc., based 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. In accordance with the Privacy policy, Google Inc. makes the collected cookies available on

<https://www.google.com/intl/cs/policies/privacy/#nosharing>.

Facebook Pixel, operated by Facebook Inc., based 1601 Willow Road, Menlo Park, CA 94025, USA. In accordance with the Privacy policy, Facebook Inc. makes the collected cookies available on https://www.facebook.com/full_data_use_policy

Data transfer outside the EU

Data are stored on secured servers in the USA and later also in the European Union or in the countries that ensure the adequate level of security on the basis of the European Commission's decision.

Customers' rights with reference to protection of personal data

You have a number of rights in relation to the protection of personal data. If you decide to assert any of these rights, please contact us via email:support@glocin.biz.

You have **the right to have access to information**. We have complied with the right by informing you on this page, which conforms to the principles of processing personal data.

Due to the **right to have access** you can approach us any time and you will be informed within 30 days what personal data are processed in your case and why.



If there is some change or you find that your personal data should be updated you have **the right to supplement and change** personal data. Apply for the change using the following customers' email: support@glocin.biz.

You may apply the right to limit processing, if you think that your personal data are inaccurate, or you think that we breach the law by processing it illegally, but you do not wish to erase all the data, or if you object to processing.

You may limit the scope of your personal data or the purpose of processing. (E.g. by unsubscribing from a newsletter a customer curtails the purpose of processing designed to send commercial communication.)

Right to data portability

You shall have the right to receive the personal data which you provided and transfer them to somebody else. We will proceed in the same way like in case of applying the right to access – though there will be a difference; you will obtain the information in a machine readable form. We need at least 30 days to do this.

Right to erasure (to be forgotten)

You have the right to erasure (to be forgotten). We would not like to erase you, but if it is your wish, you have the right to be erased. In that case we will erase all your personal data from our system and from the systems of sub-processors and from data backup. We need 30 days to ensure that all the necessary steps are taken.

In some cases we are bound by the statutory duty and we have to keep the record of issued tax documents for the period stipulated by law. In that case we will erase all the personal data that are not bound by other regulations. You will be notified as regards the erasure by the means of email.

Appealing to the Office for the Protection of Personal Data

If you feel that your personal data are not dealt with in accordance with the law, you have the right to appeal any time to the Office for the Protection of Personal Data. We will be glad if you could let us know of any irregularities or your suspicions in advance so that we could do something about it and rectify the situation.

Unsubscribing from newsletters and commercial communication

E-mails with the information concerning GLOCIN project, articles, products and services are sent to you if you are our customer, but only on the basis of our legitimate interest.



If you are not our customer yet, then we will sent the information only with your consent. In both cases you may unsubscribe from sending commercial communication using your profile in the GLOCIN customer portal.

Confidentiality obligation

Let us assure you that our employees and associates who will process your personal data are obliged not to disclose any data as well as security measures. Their publication would jeopardise security of your personal data.

Without your consent your personal data will not be disclosed to any third party.

These principles of personal data processing are valid since 25th May 2018 and they replace the former Personal Data Protection Act, which could be found [HERE](#)

[>>](#)

