

Data Processing Policy

The Controller

1. The controller is The Data Exchange Foundation OÜ (“The Foundation”), a company established in Estonia and registered with the Estonian Commercial Register under no. 14563576.
2. To contact The Data Exchange Foundation please use the chat support available at [dx.network](#) or write to info@dx.network. Otherwise please address your correspondence to the following address:

The Data Exchange Foundation OÜ
Tina 9,
Tallinn, 10126
Estonia

Processing of Personal Data

3. The Foundation may process personal data for the purpose of
 - 3.1. performance of its contractual duties to the data subject. The basis of processing personal data is article 6(1)(b) of the [General Data Protection Regulation](#). Provision of the personal data which The Foundation collects about a data subject is necessary for entering into and performance of the contract between The Foundation and the data subject;
 - 3.2. compiling analytics about the use of this website and of the services provided by The Foundation. The basis of processing of personal data is article 6(1)(f) of the [General Data Protection Regulation](#).
 - 3.3. performance of due diligence measures set forth in the laws on prevention of money laundering and similar laws even if the law itself does not require performance of such measure, but market practice does (*e.g.*, if financial institutions decline to transact with The Foundation if such measures are not performed). The basis of processing of personal data is article 6(1)(f) of the [General Data Protection Regulation](#).
4. Other than the personal data input or shown by the data subject itself on this website,
 - 4.1. The Foundation collects personal data about location (including IP address) from which and time when the data subject accesses this website, and
 - 4.2. receives data from partners or service providers to whose page the data subject is redirected in process of transacting with The Foundation. For instance, the providers of identification service or of digital signature or smart-contract service.
5. The Foundation transfers personal data collected by it to recipients belonging to the following categories:
 - 5.1. providers of communication platforms,
 - 5.2. providers of analytics,

- 5.3. providers of digital signature service and of identification service,
 - 5.4. providers of servers and access to network (such as Internet),
 - 5.5. entities belonging to the same group as The Foundation.
6. Furthermore, The Foundation's sub-contractors in the fields of IT and marketing who process personal data in the same servers where The Foundation stores personal data may have access to personal data. Furthermore, professional advisors (*e.g.*, attorneys, auditors) and financial institutions who are subject to duties of confidentiality may gain access to such data when providing services to The Foundation.
 7. The Foundation does not transfer personal data outside the European Union and countries in respect of which the EU Commission has adopted a decision referred to in article 45(1) of the [General Data Protection Regulation](#) (including the United States of America, provided that the Privacy Shield Framework applies).
 8. Without prejudice to the a data subject's right to erasure, The Foundation stores personal data for the longer of the following periods:
 - 8.1. the period on the passing of which contractual claims from the contract between The Foundation and the data subject become statute-barred;
 - 8.2. the period for which The Foundation must keep information about the borrower under applicable laws (including applicable laws on prevention of money-laundering and financing of terrorism) where The Foundation is under a duty, whether contractual or not, to keep such information or where the best market practice requires it.
 9. The Foundation may obtain biometric data about data subjects from providers of identification service (from when the data subject was identified) or from providers of digital signature or smart-contract service. In that event processing is based on article 9(2)(a) of the [General Data Protection Regulation](#).

Rights of the Data Subject

10. The data subject has the following rights:
 - 10.1. to obtain from The Foundation confirmation whether personal data concerning him or her is processed,
 - 10.2. where personal data concerning him or her is processed, obtain from The Foundation the information listed in article 15(1) of the [General Data Protection Regulation](#),
 - 10.3. to request that The Foundation rectify incorrect personal data pertaining to the data subject,
 - 10.4. to provide to The Foundation additional data so that incomplete personal data pertaining to the data subject is completed,
 - 10.5. to request that The Foundation delete, on conditions set forth in article 17 of the [General Data Protection Regulation](#), personal data pertaining to the data subject,

- 10.6. to request that The Foundation restrict processing personal data pertaining to the data subject in situations explained in article 18(1) of the [General Data Protection Regulation](#),
 - 10.7. to receive from The Foundation, in text format, the personal data which he or she has provided to The Foundation,
 - 10.8. to object, on conditions set forth in article 21 of the General Data Protection Regulation, to processing of his or her personal data when The Foundation processes the personal data for the purposes of other legitimate interests pursued by The Foundation,
 - 10.9. to withdraw consent for processing biometric data. Withdrawal of consent shall not affect the lawfulness of processing the data prior to the withdrawal. Please note that in that event The Foundation might be unable to transact with you in any way whatsoever (including by making payments) unless you come to The Foundation's office to be identified by a member of staff of The Foundation,
 - 10.10. to lodge a complaint with a supervisory authority (Andmekaitseinspektsioon, info@aki.ee, Väike-Ameerika 19, Tallinn 10129, Estonia).
11. To exercise any of the rights referred to in clause 10 (except for the right to lodge a complaint with a supervisory authority) the data subject should write to The Foundation using the details set forth in clause 2. The Foundation shall answer to the request without undue delay and in any event within one month of the receipt of the request (that period may, taking account of the circumstances, be extended by two months). The time of answering will depend on the number of requests The Foundation receives as well as on the content of a particular request.

Cookies

12. Cookies are small files text files placed on your device when you visit a website.
13. Third parties (such as the providers of identification service) may place cookies, for instance for the purposes of advertising and analytics, to your device if you use this website.
14. Most browsers allow you to control cookies, including turn off their acceptance by your device, through their settings' preferences. However, if you turn off the ability of your device to accept such cookies, you may lose access to this website and the services provided via it.
15. Most devices also allow you to delete the cookies which have already been set into your device. Browser manufacturers provide help pages relating to cookie management in their products.
 - 15.1. [Chrome](#)
 - 15.2. [Microsoft Edge](#)
 - 15.3. [Internet Explorer](#)

- 15.4. [Firefox](#)
- 15.5. [Safari \(desktop\)](#)
- 15.6. [Safari \(mobile\)](#)
- 15.7. [Opera](#)