



# Privacy policy

## Niolic Limited

We place a high priority on data privacy and understand the importance of protecting and respecting your personal information. This Privacy Policy outlines the information we collect, how we use it, to whom we disclose it, your rights, and key contact details.

# 1. Overview

To provide you with our e-money exchange, investment, trading, and passive income services, Niolic Limited needs to collect information about you. Our aim is to be non-intrusive, and we will not ask unnecessary questions. Any information we receive about you will be subject to strict controls to minimise the risk of misuse – including unauthorised access to, or disclosure of, your personal data.

Please read this notice carefully, together with our Terms and Conditions and any other documents referred to in it. Here we set out the basis on which any information we collect about you or from you, or that you provide to us, will be processed by us and other parties in providing you with the services accessed through the website, apps or over the email. Niolic (“our”, “us” and “we”) commits to using your information only in accordance with the terms of this Privacy Policy.

For the purposes of this Privacy Policy, the term “information” means any confidential and/or personal data or other information related to users of Niolic services – including, but not limited to, corporate and individual customers and their connected parties.

By visiting this website, our partners’ websites, or providing your personal information to one of our employees, for example by messenger or email, or online support, you accept and expressly consent to our use and disclosure of your personal information and direct us to do so in the manner described in this Privacy Policy.

This encompasses your consent to process any sensitive personal data you provide, as outlined in section 2 below. It also includes information you provide while browsing our website, requesting quotes, registering for an account, entering into an investment services contract with subsequent income, participating in a competition, promotion, or survey, and when you contact us for other purposes.

If you have any concerns regarding any provisions of this Privacy Policy, please write to us so we can provide additional information.

## **Special Note About Children**

Children are not permitted to use Niolic. We respectfully ask minors (individuals under 18 years of age) not to provide us with any information or use Niolic services.

## 2. What information we collect

We may collect and process the following information about you:

Information you provide to us. You may provide us with information by filling in forms on our website, our partners' websites or by talking with us over the phone or corresponding with us via email or otherwise.

This includes information you provide when you browse our website, request a quote, register for an account, enter into a contract for the supply of money transfer services, enter a competition, promotion or survey and when you contact us for other reasons.

### **Initial Information**

To open a Niolic account or use Niolic, you must provide your name, country of residence and email address. We respect our clients' privacy and do not ask for your contact phone number or identification documents. We may request identification documents only in the event of disputes arising between us and you.

To make payments using Niolic, you may be asked to provide transaction details (cryptocurrency wallet number, transaction ID, routing hash number).

### **Additional verification information:**

We may ask you to send us additional information if:

- we cannot verify the information that you provide; or
- a query is raised by background checks (see below); or
- if you send or receive certain high-value transactions or high overall payment volumes through Niolic; or
- as is otherwise required in order for us to comply with our regulatory obligations under anti-money laundering, terrorist financing, bribery and corruption, sanctions and other applicable regulations.

The additional information may include a copy of your driving licence, passport, and/or a recent utility bill, or other information verifying your identity and address.

We may also ask for evidence of source of funds or wealth, for example bank statement, investment statement, business transaction summary, proof of property sale or probate documents etc.

## **When we communicate**

When you communicate with us for customer service or other purposes, including by online chat, email or using other methods, we retain that information and our responses to you.

We ask that you do not disclose sensitive personal information, including the state of your health, in any communication, however if you should do so voluntarily, you consent for us to hold that information in our communication records (see further details below).

## **Information we collect when you use our website or app**

When you arrive at or leave the Niolic website, whether connected by a fixed line or wirelessly, we receive the web address of the site that you came from or are going to.

While you are using our site we collect information on the services you search for or view, page response times and length of visits to specific pages, how you interacted with each page (including scrolling, clicks and mouse-overs), and methods used to browse away from the page.

We collect information about the device you are using, such as the type of device, operating system and platform, the type and version of browser, browser plug-in types and versions, the times you access our website/app and the time zone setting, mobile network information and unique device identifier, which may include your Device's IMEI number and/or MAC address, or the mobile phone number used by the Device. We do not capture GPS information about you.

If you give us permission, our app may collect information stored on your Device, including contact information from your address book, photos, videos or other digital content. The app may periodically re-collect this information in order to stay up-to-date.

## **Transaction information**

When you use Niolic to purchase currency or send currency to someone else, we ask you to provide information related to that transaction. This information includes the amount, currency and type of the transaction, exchange rate.

## **Privacy policy notification to 3rd parties**

Although the information on Connected Parties and/or Recipients is stored for a certain period of time in compliance with applicable law, we will not use it to market to the non-registered person.

Additionally, these persons have the same rights to access and correct information about themselves as registered users of Niolic. You should bring this Privacy Policy to their attention at the earliest opportunity so they are aware of how their information will be processed by us and aware of their rights in relation to that information.

## **Information about you that we receive from third parties**

### **Fraud prevention checks**

To protect ourselves and our customers against fraud, we verify the information you provide with Anti-Fraud Agencies and Electronic Identity Verification Services. In the course of verification, we receive information about you from such services.

### **Social media**

If you allow us to, we will collect friend lists from Facebook and similar information from other third parties such as Twitter and Google – the app will periodically re-collect this information in order to stay up-to-date – and we may collect other information you have chosen to make publicly available on social media sites. Where we are one of your connections on a social media site, we may also connect information you have chosen to share with your connections on that site.

## **Information about you from other sources**

We may also collect information about you from other sources, including other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control.

We may receive information about you if you use any of the other websites we, or our group companies, operate or the other services we provide. We are also working closely with third parties (including, for example, business partners and affiliates, customers who participate in our refer-a-friend programme, service providers, advertising networks, analytics providers, and search information providers) and may receive information about you from them. This may be combined with the information you provide to us.

We will use information we receive from business partners for marketing purposes only if you have provided your consent to do so, either to the third party which collected the information, or to us.

## **Sensitive data**

Data privacy regulations prohibit the processing of 'special categories of personal data', also called 'sensitive data' unless you have given your consent.

Sensitive data includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, and data concerning health, sex life or sexual orientation. There are also restrictions on processing of criminal convictions and offences.

To avoid infringing these restrictions, it is Niolic's policy that we do not ask for or collect any of the above data from you or any other party, so we therefore ask that you please do not reveal any sensitive data about yourself or others in any communication with us.

If you do reveal sensitive data, for example by email, you will be giving express consent for us to process that information by storing the recording of the email or other communication.

### **3. How we use your information**

Our primary purpose in collecting your information is to provide you with a safe, smooth, efficient and customised experience. By submitting your information to Niolic and using Niolic services you agree that we may use your information for the following purposes:

#### **Fulfilling your requests**

We will use your information to:

- provide you with the information, products and services you request from us, including providing you with cryptocurrency investment services and bonus offers;
- complete any transaction you are undertaking with us; and
- administer any promotion, survey or competition you enter through our website(s).

#### **Communication and customer service**

We communicate with our users on a regular basis via email to provide requested services and help you manage your account. These activities include:

- responding to requests for customer service;
- confirming information concerning a user's identity, business or account activity;
- informing users if we believe their accounts or any of their transactions have been used for an illegitimate purpose;
- resolving customer complaints;
- carrying out collection activities;
- resolving disputes about billing or transactions;

- conducting customer surveys; and
- investigating suspicious transactions.

We use your email address to:

- confirm that you have opened a Niolic account;
- send you notifications about the interest rewards you receive through Niolic;
- send you information about important changes to our products and services, including notifications of any instances when our services may not be available; and
- send notices and other disclosures required by law.

Users cannot opt out of these communications, but they will be primarily service-oriented rather than promotional.

As we are obligated to send these communications to current customers, if you do not wish to receive these communications at all, then unfortunately you must close your account, however if you do not wish to receive them in a particular way, please contact us to advise us of your preferred communication method.

## **Marketing**

We also use your email address to send you other types of communications that you can control, including newsletters, customer surveys and special promotions. These communications are to:

- provide you with information about services we or other Niolic Companies offer that are similar to those that you have already enquired about or purchased;
- provide news about cryptocurrency market movements, marketing and advertising messages, updates on the services we offer, and promotional offers based on your activities when using the Niolic services;
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you, which may be based on your activity on our website(s) or third parties' websites;
- make suggestions and recommendations to you and other users of our website(s) about services that may interest you or them, which may be based on your activity on our website(s);
- keep you informed about cryptocurrency market events and news; and
- tell you about new products and features we are developing that you may find useful.

You may choose whether to receive some, all, or none of these communications, and how you receive them, when you request a quote, [email us](#).

## **Service improvements and account management**

We will use your information to deliver and improve NioIic and manage your account, including:

- verifying your email when you create an account and reset your password;
- resolving disputes, collecting fees and troubleshooting problems;
- allowing us to manage risk and to detect, prevent, and/or remediate fraud or other illegal or prohibited activities;
- detecting, preventing or remediating violations of our policies, Terms and Conditions or other user agreements;
- providing you with customer support services including notifying you of changes to our service, including any outages, and to send you service emails relating to your account and transactions on your account;
- improving our existing, and developing new, products, services, websites, apps and capabilities;
- administering our website(s) and for internal business administration and operations purposes, including storage, backup, archiving, troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- as part of our efforts to keep our site safe and secure, including managing and protecting our information technology infrastructure.

## **Device information**

We will use this information to:

- administer our website(s) and the app for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our website(s) and the app to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our website(s) and the app safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our website(s) and the app about goods or services that may interest you or them;
- to verify your identity, protect against fraud, comply with anti-financial crime laws and to confirm your eligibility to use our products and services; and
- to comply with our regulatory obligations.

## **Location information / IP (Internet Protocol) address:**

We will use information about your location, derived from your IP address:

- to deliver relevant advertising to you, for example, information on tailored crypto money transfer services for your region; and
- to protect against fraud.

## **Third party information**

We will combine third party information with information you give to us and that we collect about you. We will use all of this information:

- to process applications for products and services available through us including making decisions about whether to agree to approve any applications;
- for the purposes set out in the sections above (depending on the types of information we receive).

## **Questionnaires, surveys, competitions and profile data**

From time to time we may offer you optional questionnaires, surveys and competitions. If you choose to answer these questionnaires, surveys or competitions, we may use your information to improve Niolic, send you marketing or advertising information, manage the competitions and for such purposes as collecting demographic information or assessing users' interests and needs. You will be given notice of how the information will be used prior to your participation in the survey, questionnaire or competition.

## **Accessing and changing your information**

You can review the information you have provided to us and make any desired changes to your information or to the settings on your Niolic account at any time by logging in to your account on the Niolic website, visiting the profile page and changing your details.

## **4. Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site and to provide interest-based advertising. You may adjust the settings on your browser to refuse cookies but some of the services on our website(s) may not work if you do so. For detailed information on the cookies we use and the purposes for which we use them see our [Cookies Policy](#).

## 5. Sharing information with third parties

- To support our business and provide services to you
- Just like most financial/payment service providers, Niolic works with third-party service providers (including partner crypto exchanges and intermediary crypto exchanges) who provide important features that allow us to make our money transfer services easier, faster and more secure.
- This includes business partners under contract with us who support our business operations, such as fraud prevention, bill collection, marketing, customer service, contract administration and technology services. We need to disclose user data to them from time to time so that the services can be performed. Our contracts dictate that these business partners only use your information in connection with the services they perform for us and not for their own benefit.
- By accepting this Privacy Policy and maintaining an account with Niolic, you expressly consent to the transfer of your data to those third parties for the purposes listed.

### **Partner cryptocurrency exchanges and intermediary cryptocurrency exchanges**

- When you ask us to process a currency or payment transaction, we will provide your information to business partners contracted with Niolic to complete the transaction, such as forwarding details to partner exchanges or cryptocurrency exchangers involved in the transaction.

### **Anti-fraud, anti-money laundering, sanctions and risk management**

- To carry out the checks described in section 3, we will provide your information to our third party business partners who carry out these checks.

### **Reporting to regulators**

- As a regulated financial institution, in some jurisdictions we are obliged to report transactions to the relevant financial regulator. Where required, we will provide your information to the regulators to meet these legal obligations.

### **Legal process**

- We may also disclose necessary information in response to the requirements or a civil or criminal legal process.

- We may disclose or share your information in order to enforce or apply the Terms and Conditions – and other agreements – between you and us, or to investigate potential breaches to protect the rights, property, or safety of Niolic, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and financial risk reduction and, if required, to obtain professional advice.

## **Where required by law**

- We may disclose necessary information to the police and other law enforcement agencies, security forces, competent governmental, intergovernmental or supranational bodies, competent agencies, departments, regulatory authorities, self-regulatory authorities or organisations, and other third parties, including Niolic Group companies, where we are legally compelled and/or permitted to do so.

## **Mergers and acquisitions**

- As with any business, it is possible that in the future Niolic could buy, merge with, or be acquired by, another company. We may disclose your information to the prospective seller or buyer of such business or assets, along with its professional advisers. If Niolic or a substantial proportion of its assets are acquired by a third party, information held by us about our customers will be one of the transferred assets, and such successor company would continue to be bound by this Privacy Policy unless and until it is amended.

## **Analytics and search engine providers**

- We share your IP address with analytics and search engine providers that assist us in the improvement and optimisation of our site, and also for 3rd party advertising on 3rd party websites. See also our Cookie Policy.

## **Affiliates**

- We have a select group of affiliates to whom we occasionally refer customers. If we think you may benefit from these services, we will ask you if you would like us to pass on your details. We will always name the affiliate and ask you for permission before we refer you, and we will pass on your details only where you give us permission to do so. If we refer you, we will typically pass on your name, email address and telephone number.

## **Third party websites**

- Our site may, from time to time, contain links to the websites of our business partners, advertisers and affiliates.

- If you request a quote directly on a third-party website or via a third party application, any information that you enter on that website or application (and not directly through Niolic's website) may be shared with the owner of any such third party website.
- Please note that these websites have their own privacy policies and we do not accept any responsibility or liability for those policies. Please check those policies before you submit any information to third party websites.

## 6. Transferring data overseas

Niolic is committed to adequately protecting your information regardless of where the data resides and to providing appropriate protection for your information where such data is transferred outside of the EEA.

The information that we collect from you may be transferred to, and stored in, a country outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for our suppliers. These staff may be engaged in the fulfilment of your request, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

The laws in some countries may not provide as much legal protection for your information as in the EEA. In these circumstances, our policy to protect your data is to rely on findings of adequacy by the European Commission (for countries in scope of those findings), the EU-US Privacy Shield (for transfers to the USA) or standard contractual clauses adopted by the European Commission or the IOM Information Commissioner (for all other countries).

Each time you attempt to make a cryptocurrency transfer using your Niolic account, Niolic may transmit your relevant information to the network provider through which you are making the transfer, who may be located outside the EEA, as well as to any other service providers as described above, for the purposes of processing, executing, or otherwise handling the payment and providing information about it (to obtain Hash or TAX ID). This is done to provide you with information about the payment.

By submitting your information and making use of Niolic services, you agree to such transfers, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy.

We will do our best to protect your information, however we cannot guarantee the security of your information transmitted to our site or sent to us by email or other non-secure electronic methods; any such transmission is at your own risk. Once we have received your information, we will use protective procedures and security features to try to prevent unauthorised access.

## 7. Data Retention Policy

We are obliged by our regulators to retain account data for 6 years after the closure of an account. In some circumstances, such as an enquiry from a law enforcement agency, we may have to hold it longer. We may also retain information if required to protect our interests, for example in case of litigation. When data falls outside those retention periods we will take steps to delete it from our system. Where you have asked us not to contact you, we will retain that information on a 'do not contact' list to reduce the risk of us contacting you in the future.

## 8. Systems Security Policy

Niolic has security measures in place designed to prevent data loss, to preserve data integrity, and to control access to the data. Only authorised employees of Niolic and our business partners processing data on our behalf have access to your personal data. All Niolic employees who have access to your personal data are required to comply with our privacy policy. All business partners are requested by Niolic to ensure that any of their employees who have access to your personal data have signed non-disclosure agreements. Contracts with business partners acting as data processors for Niolic involving personal data require an adequate level of security and require that personal data is processed only as instructed by Niolic.

### **System security and monitoring**

To ensure data privacy, confidentiality and integrity, all information disclosed, shared, stored or used and any transactions performed by you through our website and app are encrypted.

To provide a secure environment for our website and app, we hold your data in secure data centres with high levels of physical and technical security, including using firewall systems, data encryption and anti-virus protection. We use security surveillance systems to detect and prevent illegitimate access to and activities on our systems. External security experts conduct regular security reviews on our systems and we work with them to keep abreast of information security technology developments and implement relevant enhancement.

### **Password security**

To control access to our services, every customer is required to input a Username and Password. To help us protect your information, you are advised to do the following:

- Do not choose a password that could be easily guessed by another person.

- Avoid using personal information such as your name, birth date or telephone number, or ordinary words found in a dictionary.
- Memorise your password – do not write it down.
- Never reveal the password to anyone else. We will never ask you for your password and you should not disclose it to anyone claiming to work for us or our business partners.
- Do not use the same password on other services.

## **Customer responsibilities**

We keep our security technology up-to-date to protect your information, but we do not have control over the devices you use to access Niolic.

It is your responsibility to safeguard your online information and transactions by taking all reasonable measures which may include the following:

- Do not share your information or provide any opportunities for anyone to gain access to your information through your devices, including tablets, phones, watches or laptops.
- Do not click on any internet link contained in an email or SMS which directs you to a Niolic website. Always manually type our address [www.niolic.com](http://www.niolic.com) into your internet browser or use the app.
- Log out and close your browser before visiting other websites once you have completed your transactions.
- Ensure that you use the latest version of your internet browser and that you have up-to-date anti-virus, firewall and other security software installed on your device.

## **9. Customer rights**

Under the Data Protection legislation you have the following rights:

- Right to information about processing
- Right to rectification
- Right to erasure ('right to be forgotten')
- Right to data portability
- Right to object to processing
- Rights with regard to automated processing and profiling
- Right of access
- Right to restriction of processing
- Right to information about processing

## **How we process your data is detailed in this privacy policy.**

### **Right to Rectification**

Although we always strive to maintain the accuracy of your information, we welcome your corrections. You can update your profile at any time by logging into your account through the Niolic website or by contacting a customer service manager via online chat or [email](#) to make any changes. We may ask you to provide additional information for verification if you are changing certain details, such as your name or address.

### **Right to Erasure (right to be forgotten)**

Our Data Retention Policy (see section 7) explains the circumstances when we can or are obliged to retain information, however outside of those periods we will delete your information in line with our data retention policy and on request. We will maintain a record that you made an erasure request to reduce the likelihood of us contacting you in the future but we will use that information for no other purpose.

### **Right to object to processing**

If you make a request for us to stop processing your information, we will investigate to see if there is a compelling reason for processing to continue and will discuss the conclusion of the investigation with you.

You cannot object to processing which is a legal obligation or where we must process your information to satisfy a contract to which you are a party. If you previously gave consent and we processed your data on the basis of that consent, you cannot object to that past processing, however you can ask us to stop processing it in the future.

### **Right with regard to automated decision making and profiling.**

Niolic puts the human factor at the heart of our customer service, so there are no circumstances when profiling or other automated decision making will have a legal impact on you without a person reviewing and making a decision on the result. If you feel you may have been unfairly impacted by profiling, our team can manually assess whether the decision is fair and discuss the situation with you.

### **Right of access**

To ask for a copy of the personal information we hold about you free of charge. Please note that this does not include providing copies of documents.

We will respond to your request within 30 days.

## **Right to restriction on processing**

To ask us not to process your information for marketing purposes.

You can do this by checking or unchecking certain fields in the forms we use to collect your information, logging into your account and changing your contact settings, or clicking the "unsubscribe" link(s) at the bottom of each marketing or promotional email.

You can exercise any of the aforementioned rights by contacting us at [compliance@niolic.com](mailto:compliance@niolic.com) or by writing to customer service support.

## **10. Contacting us**

The Data Controller. The Data Controller is Niolic Limited trading as Niolic, Registered office address 20 Reayrt NY Crink, Crosby, Isle of Man, IM4 2EA.

If you wish to exercise your right to access your information or have any questions regarding this Privacy Policy, Niolic's information practices, or your relationship with Niolic, you can contact us by writing in the online chat or any other customer support messenger listed on our website, by sending an email to [compliance@niolic.com](mailto:compliance@niolic.com), or by writing to us at Niolic Limited, 20 Reayrt NY Crink, Crosby, Isle of Man, IM4 2EA.

## **Complaints to the Data Protection Officer**

If you believe that we have breached a privacy law with which we should comply, please send an email to [compliance@niolic.com](mailto:compliance@niolic.com). We aim to respond in a reasonable time, normally within 30 days. Our Compliance team and Data Protection Officer will look after your complaint and will give you additional information about how it will be managed.

## **11. Changes to this Privacy Policy**

We may amend this Privacy Policy at any time, as new features are added to the Niolic services or as we incorporate suggestions from our customers. Any changes we may make will be posted on Niolic website so please check back frequently.

Your continued use of our website(s) after a posting of a new version of this Policy will constitute your acceptance of, and agreement to, any changes. If you disagree with the terms of this Privacy Policy, you may close your account at any time.