

## PRIVACY POLICY

<b>BASIC INFORMATION REGARDING THE PROCESSING OF YOUR PERSONAL DATA</b>	
<u>Data Controller</u>	GOLIVE ENTERTAINMENT HOLDING ESPAÑA, S.L. (“ <b>XAVECOIN</b> ”, “ <b>WE</b> ” or/and “ <b>US</b> ”) (“ <b>XAVE</b> ”, “ <b>WE</b> ” or/and “ <b>Us</b> ”) with address at Mogoda 1, local 6, Polígono Industrial Can Salvatella, Barbera del Valles Barcelona (08130), Spain.
<u>Purposes</u>	<p>XAVE collects your information to provide you with personalized services. In this regard, XAVE will collect your information in order to:</p> <ul style="list-style-type: none"><li>- To provide you with the products and / services you request from Us.</li><li>- Deal with your enquiries, questions, and requests;</li><li>- Manage our Website; and</li><li>- Contact you with electronic newsletters and/or promotional e-mails relating to products, events, news, and services offered by the XAVE through e-mail.</li></ul> <p>The information that XAVE collects, and how that information is used and processed, depends on which and how you use the referred services.</p>
<u>Legal Basis</u>	<ul style="list-style-type: none"><li>- Legitimate interests.</li><li>- Consent.</li><li>- Compliance with legal obligations.</li></ul>
<u>Personal Data</u>	Full name, surname, data of birth, national identity number, phone number, email address, mobile phone number, country of residence, bank details, IP address, an online identifier or one or more factors relating specifically to the economic, cultural or social identity of the natural person.
<u>Recipients</u>	<ul style="list-style-type: none"><li>- Service providers and commercial partners, that are needed to provide the products and / or services requested by the User, and with whom XAVE has signed a Data Processing Addendum.</li><li>- Security forces, judges and courts, regulatory entities, government authorities or other competent third parties.</li><li>- Third parties only if it is strictly necessary due to a legal requirement, or to provide the product and / or services requested by the users of XAVE.</li></ul>
	At any time, you may execute the following rights concerning the processing of your personal data, among others:

<u>Rights</u>	<ul style="list-style-type: none"> <li>- Right of access.</li> <li>- Right to rectification.</li> <li>- Right to erasure (or the right to be forgotten).</li> <li>- Right to object.</li> <li>- Right to restriction of processing.</li> </ul> <p>To exercise the abovementioned rights, you can contact XAVE at <a href="mailto:hello@xavecoin.com">hello@xavecoin.com</a> including your full name and e-mail address or by written notice to GOLIVE ENTERTAINMENT HOLDING ESPAÑA, S.L with address at Mogoda 1, local 6, Polígono Industrial Can Salvatella, Barbera del Valles Barcelona (08130), Spain.</p> <p>In the event that you request the removal of your personal data you may not be able to fully access this web site, nor XAVE provide you with its products and / or services.</p>
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This Privacy Policy describes how **XAVE** collects and processes your Personal Data (as described below), how We use and protect this information, and your rights in relation to this information when you use and/or enter to our Website, and/or use our products and/or services.

“**Personal Data**” means any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**XAVE** informs you that will collect and subsequently process the personal data as Data Controller. For such reason, you may contact Us at:

**GOLIVE ENTERTAINMENT HOLDING ESPAÑA, S.L.**

Address: Mogoda 1, local 6, Polígono Industrial Can Salvatella, Barbera del Valles Barcelona (08130), Spain

E-mail: [hello@xavecoin.com](mailto:hello@xavecoin.com)

**1. What Personal Data Do We collect**

We will collect personal data about you from a variety of sources, including information we collect from you directly (e.g. when you contact us through the contact form available on the Website, register to access the platform of XAVE, or duly fill the Know Your Customer (KYC) process to be able to use the products and / or services provided by XAVE) or through the e-mail addresses included for information purposes.

1.1 Personal Data We collect directly from you

The categories of personal data that We collect directly from you include:

- Personal details (g. full name, surname, nationality, date of birth, national identity number).
- Contact details (g. phone number, email address, mobile phone number).
- During the KYC process to be to use the products and / or services of XAVE, We collect one or more factors relating specifically to the economic, cultural or social identity of the natural person.
- Online identifiers such as IP addresses, and / or the blockchain transactions made by the user of the products and / or services of XAVE, which can be associated to the natural person by their wallet / public key / account on the blockchain.
- Information We collect automatically from you. Further information about our use of Cookies and Tracking Technologies is available in our [Cookies Policy](#);

## **2. How We use your Personal Data and on what legal basis**

We use and subsequently process Personal Data We collect about you on the following legal basis, and for the purposes identified below, and We will process your Personal Data on the basis of our legitimate interest, for the following purposes:

- Provide and personalize our services;
- To manage our Website;
- To manage XAVE's platform and provide its products and / or services.
- To deal with your enquiries, questions, and requests;
- To protect the security and/or integrity of our Website and IT infrastructure;
- To understand how you use our services and to enable Us to improve and further develop the features, performance and support available on our Website, which may entail the provision of anonymous statistical information about our visitors (however, without it being used to identify any individual user);
- As mentioned in Section 4 of this Privacy Policy, among other, for disclosures to any of our employees, officers, agents, business partners, who process the personal data for the purposes set forth in this Privacy Policy;
- To allow third party service providers and vendors engaged by XAVE to access the personal data in order to provide Us with the services required to fulfill the purposes set forth in this Privacy Policy;
- For any disclosures to third parties required due to a legal requirement, or to provide the product and / or services requested by the users of XAVE.
- To contact you with electronic newsletters and/or promotional e-mails relating to products and services offered by the XAVE, unless you have expressly manifested your desire to opt out of such marketing communications, or We are otherwise legally prevented from doing so; and
- For any other purpose disclosed to you at the time you provide Us with your personal data, to the extent that you have granted Us your prior consent to that particular processing. For example, We will obtain your consent to collect and use certain types of personal data when we are required to do so by law (g. in relation to our direct marketing activities, Cookies and Tracking Technologies, or when We process sensitive personal data).

If We ask for your consent to process your personal data, you may withdraw your consent, using one of the following procedures:

- At any time by contacting Us at [hello@xavecoin.com](mailto:hello@xavecoin.com) including your full name and e-mail address;
- By written notice to GOLIVE ENTERTAINMENT HOLDING ESPAÑA, S.L. with address at Mogoda 1, local 6, Polígono Industrial Can Salvatella, Barbera del Valles Barcelona (08130), Spain.

We will also process your personal data in order to ensure an optimum level of compliance with the applicable legal obligations to which XAVE is subject and cooperate with regulators and law enforcement bodies where necessary, specifically related to the prevention of money laundering processes.

### 3. What rights do you have over your Personal Data

You have certain rights regarding your personal data, subject to local law. These include the following rights:

- To know how We are processing your personal data and to access your personal data held by XAVE;
- To request the rectification of inaccurate or incomplete personal data;
- To request the erasure of your personal data when such data is no longer necessary for the initial purposes for which it has been initially collected, in accordance with applicable law;
- To restrict our processing of your personal data, under certain circumstances (in which case We will only retain the personal data for the exercise and/or defense of XAVE's rights);
- To object to our processing of your personal data, having regard to the given circumstances and for reasons related to their particular situation (in which case We will only retain the personal data for imperative legitimate reasons or the exercise and/or defense of XAVE's rights);
- This includes the right to object, at any time, for reasons related to your particular situation, to our processing of your personal data based on our legitimate interests or those of a third party, in which case We will cease in processing your personal data unless We are able to rely on legitimate reasons to do so;
- To request the portability of your personal data, which will allow you to obtain and reuse the personal data in a usable electronic format for your own purposes and across different services without hindrance to usability, including its transmission to another third party; and
- To withdraw the consent you may have granted to a specific processing, at any time.

We encourage you to contact us to update or correct your information if it changes or if the personal data We hold about you is inaccurate. If necessary, we will contact you if we need additional information from you in order to honor your requests.

XAVE is committed to protect your personal data as described in this policy, and as required by applicable laws. Should you have any queries or intention of requesting additional information on how to exercise your rights or to effectively submit such a request, feel free to contact Us at [hello@xavecoin.com](mailto:hello@xavecoin.com).

### 4. How do we share your Personal Data and with whom

XAVE will be able to share your personal data with third parties under the following circumstances:

- Service providers and business partners: We will allow our employees, service providers and business partners that perform amongst others, processing of secure payments, web maintenance

and other IT services, marketing and communication, accounting, finance, legal and audit and other business operations needed for XAVE to provide the products and / or services requested by the natural person.

- Law enforcement agency, court, regulator, government authority or other third party with compelling authority: We will be able to share your personal data with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party;
- Third parties: We will share your personal data with third parties for the fulfillment of the relationship you have with us, only when it is strictly necessary, and a Data Processing Addendum has been signed with such third party.
- XAVE's affiliate's: We will share your personal data only when is necessary in order to provide you with the services that you request us.
- Other third parties: We will share your personal data with other third parties only when consent has been provided.

## 5. How do we protect your Personal Data

We implement technical and organizational measures to ensure a level of security appropriate to the risk to the personal data we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal data. We evaluate these measures on a regular basis to ensure the security of the processing.

## 6. For how long do we store your Personal Data

We will keep your personal data for as long as We have a relationship with you. Once our relationship with you has come to an end, We will retain your personal data for a period of time that enables Us to:

- Maintain business records for analysis and/or audit purposes;
- Comply with record retention requirements under the law;
- Defend or bring any existing or potential legal claims;
- Deal with any complaints regarding the services.

We will delete your personal data when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, We will put in place appropriate measures to prevent any further processing or use of the data.

## 7. Contact Us

XAVE is the Data Controller in respect of the personal data We collect and process.

If you have questions or concerns regarding the way in which your personal data has been used, please contact [hello@xavecoin.com](mailto:hello@xavecoin.com).

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that We have not been able to assist with your complaint or concern, you have the

right to make a complaint to the Spanish Data Protection Agency (Agencia Española de Protección de Datos) using their website: <https://www.agpd.es/portaIwebAGPD/index-ides-idphp.php>.

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

You are entitled to request a copy of this Privacy Policy from us using the contact details set out above.

This Privacy Policy will be subject to changes, as deemed necessary from time to time.

If We change this Privacy Policy, We will notify you of the changes. Where changes to the Privacy Policy will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, We will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. among other, to object to the processing). Moreover, and to the extent that XAVE relies on consent for the performance of any of its processing activities, We will make sure to request your consent where the aforementioned changes may have a substantial impact on the relevant processing before these changes are made effective.

August 24<sup>th</sup>, 2021