

****PRIVACY POLICY****

This Privacy Policy applies to the internet presence www.gspro.network.

Below you, the member, will be informed of which data is processed during a visit to our website as well as the use of our services.

GSPRO, as mentioned at gspro.network (domain/platform), is a trade name of GS Digital Partners LLC incorporated in the Republic of Georgia with Business Identification Number 405472180. The company is registered with the Ministry of Justice of Georgia / LEPL National Agency of Public Registry. It is entitled to provide various services to members outside the Republic of Georgia according to the Free Zone Financial License and Annex issued by the Hualing Free Industrial Zone with License Number: 0110/473.

These services include Financial Services and Consulting, Cryptocurrency and Blockchain-related activities, e-wallet and Payment Processing Services, Professional Trustee Services to store and safeguard third party funds, Electronic Money Issuing, and Automated Signal Trading (including high-frequency trading in FX and cryptocurrencies in real time) engaging with cryptocurrency services, included but not limited to operating cryptocurrency exchanges, cryptocurrency trading, and operating of cryptocurrency wallet and storage services for digital assets. GSPRO operates as a fully compliant institution following European Standards to prevent Money Laundering and Terrorism Financing. GSPRO provides a wide range of IT, education channels and Telecommunication services to Non-GEORGIAN citizens and/or residents.

****§ 1 Access data****

In the event of informational usage of the website, GSPRO only retrieves the personal data that the members' browser provides to the GSPRO server. If the member would like to view GSPRO's website, GSPRO retrieves the following data, which are technically required to display the website to the member and to ensure stability and security:

- IP address
- Date and time of the request
- Time zone difference based on Greenwich Mean Time (GMT)
- Contents of the request (specific page)
- Access status/HTTP status code
- Respectively transferred data quantity
- Website from which the command originates
- Browser
- Operating system and interface
- Language and version of browser software

However, the web server stores these data separately from other data, making allocation of these data to a certain individual by GSPRO impossible.

The access data collected in the course of using our website is only stored for the period of time for which this data is required to achieve the above purposes. Your IP address is stored on our web server for a maximum of 7 days for IT security purposes.

****§ 2 Usage of cookies****

In addition to the data specified above, cookies are also stored on the member's computer when using the website. Cookies are small text files that are allocated to the member's browser and stored on the member's hard drive, and through which certain information is provided to the location that installed the cookie. Cookies cannot operate programs or transmit viruses to the computer. They serve to make the internet presence more user-friendly and effective overall.

The GSPRO website uses the following types of cookies, the scope and functionality of which are explained below:

a) Transient cookies are automatically deleted when you close the browser. These mainly include session cookies. These store a so-called session ID, with which different requests from your

browser can be allocated to the same session. This allows your computer to be recognized when you return to our website. The session cookies are deleted when you log out.

b) Persistent cookies are automatically deleted after a specific period of time, which may vary from one cookie to the next. You can delete these cookies at any time in your browser's security settings.

c) Flash cookies are not recorded by your browser but rather by your Flash plug-in. These objects store the required data regardless of the browser and have no automatic expiration date.

d) Third-party cookies are not installed by GSPRO but rather by a third-party provider. Cookies from third-party providers are created by, for example, the services of Google Analytics, which are integrated into the GSPRO website. These third-party cookies are generated by integrated plug-ins or technology from the respective organizations.

GSPRO has no influence over the cookies and privacy settings of these services or organizations and expressly notes that the services from third-party providers that are utilized are solely subject to their respective data protection guidelines.

You can find information on cookies from the following third-party services with the links below:

Google Analytics: www.google.com/intl/de/policies/technologies/cookies/

The member may configure their browser settings as they please and decline the acceptance of cookies. If the member does not wish for the processing of Flash cookies, they must install a corresponding add-on, e.g. "Better Privacy" for Mozilla Firefox addons.mozilla.org/de/firefox/addon/betterprivacy/ alternatively, the Adobe Flash Killer cookie for Google Chrome. The member may prevent the usage of HTML5 storage objects by using private mode in their browser. Furthermore, GSPRO recommends regularly manually deleting the cookies and browser history. GSPRO notes that the deactivation of cookies may prevent the usage of all functions on this website. This data processing is based on Art. 6 para. 1 s. 1 lit. f GDPR to protect the justified interests of GSPRO, namely optimization of the web presence.

****§ 3 Retrieval and usage of personal data during a contact request****

If you send us inquiries via the contact form, your message (comment) including the contact data you provided there will be stored and processed accordingly for the purpose of processing and answering the inquiry as well as for the case of follow-up questions. We do not pass on this data to third parties unless this is necessary in the context of processing and answering your contact request or you have given us your corresponding consent.

If you contact us within the framework of an existing contractual relationship or contact us in advance for information about our range of services or our other services, the data and information you provide will be processed for the purpose of processing and responding to your contact request in accordance with Art. 6 (1) sentence 1 lit. b GDPR (legal basis). Incidentally, for the protection of our legitimate interests pursuant to Art. 6 para. 1 p. 1 lit. f GDPR for the proper response to member/contact inquiries.

The data you enter in the contact form will remain with us until the purpose for the data storage/processing no longer applies (e.g. after the processing of your inquiry has been completed). Mandatory legal provisions - in particular retention periods - remain unaffected.

****§ 4 Retrieval of personal data during formation of a contract and payment****

The following data are stored for purposes of an order:

1. Name,
2. Address,
3. Telephone number,
4. E-mail address,

5. Delivery address if different from address,
6. Payment information.

GSPRO uses these data solely to execute the contract with the member and for any necessary communication with the members. These include the initiation, formation, execution, provision, and any reverse transaction of the contract. The data are stored until complete execution of the contract. If there are any commercial or fiscal retention periods, the duration period may last up to 10 years.

****§ 5 Transmission of data****

GSPRO does not transmit any personal member data to third parties, except in the following cases:

- a) if the member has given their explicit consent to this pursuant to Art. 6 para. 1 s. 1 lit. a GDPR,
- b) if it is legally permissible and necessary pursuant to Art. 6 para. 1 s. 1 lit. b GDPR for the initiation, formation, execution, provision, and any reverse transaction of the contract with the member,
- c) if there is a legal obligation to transmit the data pursuant to Art. 6 para. 1 s. 1 lit. c GDPR,
- d) if the transmission of data pursuant to Art. 6 para. 1 s. 1 lit. f GDPR is necessary for the protection of the legitimate interests of GSPRO, particularly for the assertion, exercise, or defense of legal claims.

GSPRO reserves the right to retain and transmit personal member data in case the company sells or transfers all or part of its business or assets. Should such a sale or transfer take place, GSPRO will take reasonable steps to ensure that the receiving party uses the personal data received in a manner that is consistent with this privacy policy.

****§ 6 Data security****

GSPRO uses the SSL (Secure Socket Layer) coding system with 128-bit encryption for the data transfer. This coding technology offers the highest security and is therefore also used by banks for data protection in online banking, for example. The coding system can be recognized by the small lock symbol on the member's browser (Internet Explorer, Firefox, Chrome, etc.) and by the fact that the URL bar begins with "https://". When the "https://" is visible, this indicates a secure SSL connection.

GSPRO secures its website and other systems through technical and organizational measures against loss, destruction, access, modification, or dissemination of member data by unauthorized persons. GSPRO particularly ensures the confidentiality of the data by storing the data on specially secured servers within an ISO/IEC 27001 certified data center. Access to the member's personal data is restricted to only those employees who require access to fulfill the contract.

****§ 7 Information about member rights****

Members have the right to obtain information free of charge at any time about personal data stored about them, its origin, the recipient, and the purpose of data processing, and if applicable, the right to correction, blocking, or deletion of these data.

Members can contact GSPRO at any time using the contact details provided in the imprint for this and other questions on the subject of personal data. If the member has granted consent to the usage of data, the member may revoke this consent at any time with future effect.

Further, members have the right to appeal to the competent supervisory authority for data protection if they believe that the processing of their personal data is not legal.

****§ 8 External links****

This website may contain links to external third-party websites. By clicking on these links, you are leaving the GSPRO website. GSPRO has no influence over the content and design of external websites. Therefore, the guarantees in this privacy statement naturally do not apply there.

****§ 9 Amendments to the privacy statement****

We reserve the right to adapt or update this privacy statement if necessary due to changes in the legal or official guidelines. The current privacy statement can be viewed and printed at any time on the GSPRO website at www.gspro.network

****End of Privacy Policy**** Updated: 15 December 2023