

Privacy Policy

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Responsible Person:

Margin UG (haftungsbeschränkt)

Represented by Dr. Jonathan Maycock

Am Steinsiek 7, 33611 Bielefeld

(in the following referred to as "Margin")

Margin collects, uses and stores user's personal data in accordance with the applicable Data Protection Legislation. Personal data means any information relating to an identified or identifiable natural person. Below Margin informs all website users about the type, extent and purpose of the collection and use of personal data. Terms defined in the Terms and Conditions of Margin shall have the same meaning here.

Sec. 1 and 2 apply to users who register and subscribe to Margin's services, Sec. 3 to 10 of this Privacy

Policy apply to all visitors of Margin's website.

§ 1 Collection and Processing of Personal Data when registering to Margin's website

On Margin's website Margin offers the possibility to buy a License for The Margin Bitcoin Trading Terminal, a downloadable software client owned and provided by Margin according to its Terms and Conditions.

For purchasing the Purchaser needs to register on Margin's website. For this purpose, Margin requests in accordance with Art. 6 para. 1 sent. 1 point b GDPR, the following data:

- Email
- Password
- Country

If the Purchaser is a business user, he also has to provide Margin with his VAT number.

Margin needs this data for offering its services and for invoicing. Moreover, the Purchaser may provide Margin the following data:

- First and last name

If the Purchaser provides Margin with this data he gives his express consent that Margin is allowed to process this data for contract purposes. The Purchaser has the right to withdraw his consent at any time by simply deleting this data from his profile. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

§ 2 Collection and Processing of Personal Data with a License

When buying a License the Purchaser needs to choose a payment method. The Purchaser may choose from the following payment methods:

(1) Payment with Credit Cards

For payment via credit cards, Margin uses the services of Stripe, Inc. with legal seat in the U.S. In accordance with the Commission Implementing Decision (EU) 2016/1250 of 12 July 2016 transfers from a controller or processor in the European Union to organisations in the U.S. that have self-certified their adherence to the EU-U.S. Privacy Shield Framework Principles with the Department of Commerce and have committed to comply with them are allowed. Stripe has self-certified its adherence to the EU-U.S. Privacy Shield Framework Principles and has committed to comply with them. The Personal Data that Stripe may collect in accordance with Art. 6 para. 1 sent. 1 point b GDPR during the payment process includes: Contact details, such as name, postal address, telephone number, email address; financial and transaction data, such as credit or debit card number, and bank account information; and other Personal Data, such as date of birth, SSN or EIN.

If the Purchaser allows Stripe to remember him, Stripe will store with the Purchaser's consent certain identifying information, such as a password, Purchaser's email address, or his mobile phone number ("Stripe Credentials"), and his Payment Credentials.

Please find more information on Stripe's use of Purchaser's data on Stripe's website <https://stripe.com/de/privacy>

If an attempt to buy the Software fails, or is later invalidated, Stripe may provide Margin with details of the unsuccessful payment. However, Margin is not provided by Stripe with the credit card number, bank account and other financial information of the Purchaser.

(2) Payment via Paypal

If the Purchaser chooses to pay with PayPal (PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg) Margin collects and processes the following data provided by PayPal:

The name, e-mail address, phone number (if applicable), the date of sign-up, the number of payments the Purchaser has received from verified PayPal users, and whether the Purchaser has been verified to have control of a bank account. Moreover, PayPal provides Margin with the billing address of the Purchaser and with the login status of the Purchaser. If an attempt to pay Margin fails, or is later invalidated, PayPal may also provide Margin with details of the unsuccessful payment. However, Margin is not provided by PayPal with the credit card number, bank account and other financial information of the Purchaser, except with the express permission of the Purchaser or if PayPal is required to do so pursuant to credit card rules, a court order or other legal process.

Margin processes these data according to Art. 6 para. 1 sent. 1 point b GDPR.

For more information on the use data of data through PayPal, please visit the PayPal website:

https://www.paypal.com/de/webapps/mpp/ua/privacy-full?locale.x=en_DE#5

(3) Payment via Bitpay

For payment using bitcoin, Margin uses the services of Bitpay, Inc. with legal seat in the U.S. Bitpay has NOT self-certified its adherence to the EU-U.S. Privacy Shield Framework Principles. I.e. by using Bitpay you expressly consent that your data is transferred to a company which has NOT self-certified their adherence to the EU-U.S. Privacy Shield Framework Principles.

If a Purchaser wants to pay via Bitpay, the Purchaser will be requested to fill in his email address.

This information is requested since it will enable Bitpay's system to send an email to Purchaser directly to obtain a bitcoin refund address in case of a payment exception (e.g. overpayments, underpayments, etc.).

If an attempt to pay Margin fails, or is later invalidated, Bitpay may provide Margin with details of the unsuccessful payment. However, Margin is not provided by Bitpay with any other data.

For more information on how Bitpay processes Purchaser's data, please visit Bitpay's Privacy Policy: <https://bitpay.com/about/privacy>

§ 3 Collection and Processing of Personal Data via Cookies and Log Files

1. In accordance with Art. 6 para. 1 sent. 1 point f GDPR, Margin's website uses so-called cookies in order to make available personalized functions and in order to analyze the use of Margin's website. A cookie is a small file which stores certain information about a user's access device (PC, Tablet, Smartphone etc.) on such device. When such device accesses Margin's server's website, the server receives such cookies. The server can evaluate the information stored in the cookie by different methods. Cookies enable e.g. personalized advertisements according to the collected user behavior and collecting statistical data of the use of the website. The Users may accept or disable cookies via their browser settings. However, if a user disable cookies he or she may potentially not be able to use all interactive functions of Margin's website. For more information about the processing of personal data via cookies see the section 4 Google Analytics.
2. Moreover, in accordance with Art. 6 para. 1 sent. 1 point f GDPR, every single web page uses log files, i.e. for every page impression, the access data are saved to the server log. The saved data record contains the following details:
 - The date, the time, the file accessed, the status, the request that user's browser sent to the server, the amount of data transmitted and the webpage from which the user accessed the requested page (referrer) as well as
 - The product and version information of the browser used, user's operating system and user's country of origin.
3. Margin uses the log data only in anonymized form (i.e. without any allocation to or indications about user's person) for statistical analyses, e.g. to find out on which days and at what times the offers of Margin's webpages are most popular and how much data volume is generated on Margin's webpages. Moreover, the log files enable Margin to detect possible errors, e.g. faulty links or software bugs. Thus, Margin can use the log files for the further development of Margin's webpages. Margin never associates the use and page impressions that are stored in the server log with individual persons. Margin reserves the right to use data from log files if certain facts give rise to the suspicion that users use Margin's websites and/or services in an unlawful or non contractual way.

§ 4 Google Analytics

In accordance with Art. 6 para. 1 sent. 1 point f GDPR, Margin's website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies, text files placed on user's computer, to help the website analyze how users use the site. The information generated by the cookie about user's use of the website will normally be transmitted to and stored by Google on servers in the United States.

In accordance with the Commission Implementing Decision (EU) 2016/1250 of 12 July 2016 transfers from a controller or processor in the European Union to organisations in the U.S. that have self-certified their adherence to the EU-U.S. Privacy Shield Framework Principles with the Department of Commerce and have committed to comply with them are allowed. Google has self-certified its adherence to the EU-U.S. Privacy Shield Framework Principles and has committed to comply with them.

In case of activation of the IP anonymization on this website, Google will shorten the IP address beforehand for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. The IP anonymization is active on this website. On behalf of Margin Google will use this information for the purpose of evaluating user's use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website provider.

Google will not associate user's IP address with any other data held by Google. Users may disable the use of cookies by selecting the appropriate settings on their browser. However, if a user disable cookies he or she may potentially not be able to use all interactive functions of Margin's website. Furthermore user may prevent Google's collection and use of cookie generated data and data regarding his or her use of the website (incl. his or her IP address) by downloading and installing the browser plug-in available under

<https://tools.google.com/dlpage/gaoptout?hl=en-GB>

§ 5 Collection and Processing of Personal Data when using Margin's Contact Form

If a user provides Margin personal data by using Margin's contact form he expressly gives his consent that Margin may store and use this data for the processing of user's query. He has the right to withdraw his consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Please see also further information on User's rights in Sec. 8 and about the Period of Data Storage in Sec. 9.

§ 6 Collection and Processing of Personal Data of Newsletter Recipients

If you register for Margin's Newsletter, Margin collects, stores and uses the data asked for in the registration form only for the purpose of sending you the newsletter. Moreover, Margin stores your IP address in order to be able to prove your consent. With the Newsletter Margin informs you about the products and services offered by Margin. By subscribing to Margin's newsletter only your email address provided at the registration is being transferred to, and stored at, the MailChimp server in the United States of America. MailChimp is a service offered by The Rocket Science Group LLC with legal seat in the U.S. In accordance with the Commission Implementing Decision (EU) 2016/1250 of 12 July 2016 transfers from a controller or processor in the European Union to organisations in the U.S. that have self-certified their adherence to the EU-U.S. Privacy Shield Framework Principles with the Department of Commerce and have committed to comply with them are allowed. The Rocket Science Group LLC has self-certified its adherence to the EU-U.S. Privacy Shield Framework Principles and has committed to comply with them. After registration, you receive an email to confirm your membership in the email list. On behalf of Margin MailChimp stores and uses your email address for sending of the newsletter only. MailChimp will not transfer your email address. In Margin's newsletter MailChimp includes single pixel gifs, also called web beacons. Web beacons allow MailChimp to collect information about when you open the email, your IP address, your browser or email client type, and other similar details. MailChimp uses the data from those Web Beacons to create reports about how Margin's email campaign performed and what actions you took. MailChimp provides Margin with these reports. At the bottom of each email newsletter you will find a hyperlink via which you may unsubscribe from the newsletter at any time. You may also unsubscribe from receiving the Newsletter at any time via a message to Margin's email or postal address as mentioned at the beginning of this Privacy Policy. If you withdraw your consent by unsubscribing, this does not affect the lawfulness of processing based on consent before its withdrawal. When you unsubscribe from the Newsletter, the personal data which have been retained to make available the newsletter to you will be deleted, provided such deletion does not contradict to a statutory data retention requirement. If you do not confirm your registration for the Newsletter, Margin deletes the respective data after 24 hours from your receipt of the confirmation mail.

§ 7 The recipients or categories of recipients of the personal data

In context with Margin's service providing Margin contracts service providers and auxiliary agents such as host providers, web and advertising agencies, IT service providers and the providers as mentioned in sec. 2 and 4 of this Privacy Policy who may have access to user's personal data. However, these service providers and auxiliary agents except Stripe, PayPal and Bitpay (see sec. 2 para. 1 to 3 of this Privacy Policy) are bound by Margin's instructions and contractual agreements regarding their handling of these data. This applies accordingly to service providers and auxiliary agents who have their legal seat outside the EU/EEA.

§ 8 Your Rights

The data subject may according to Articles 15 through 18 GDPR request from Margin access to and rectification or erasure of personal data or restriction of processing concerning the data subject. Moreover the data subject has, subject to Art. 20 GDPR, the right to receive the personal data concerning him or her, which he or she has provided to Margin, in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance from Margin. According to Art. 21 para. 1 GDPR, the data subject shall also have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Art. 6 para. 1 sent. 1 GDPR. Margin shall comply with the aforementioned requests if and to the extent such compliance is required by the applicable statutory laws. Requests for access to and rectification or erasure of personal data or restriction of processing may be directed to the email or post address stated at the beginning of this Privacy Policy.

Each data subject has the right to lodge a complaint with a supervisory authority of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the GDPR.

Where personal data are processed for direct marketing purposes, according to Art. 21 para. 2 GDPR, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

§ 9 Period of Data Storage

Margin processes and stores personal data only for the period, which is required to meet the purpose of processing, or as long and to the extent as statutory laws require Margin to process and/or store such data.

If the purpose of processing does not apply anymore and the applicable statutory retention requirement expires, Margin will as a matter of routine erase data or restrict the processing of data in accordance with the applicable statutory laws.

§ 10 Amendment of these Privacy Policy

Margin reserves the right to amend this Privacy Policy for the purpose of adapting it to technical or legal changes. Therefore, please access this Privacy Policy regularly in order to read up on its latest status. If necessary, Margin informs about modifications and asks for consent.