

X11 Privacy Policy

LAST UPDATED 1 February 2023

Thank you for visiting <https://bank11.io> ("Website"). The Website is owned and operated by Xeleven S.A. (together "Company", "we", "our", or "us"). This Privacy Policy ("Privacy Policy") together with our Terms of Service (collectively, "Terms") sets out the basis on which any Personal Information we collect from you ("you", "your", or "user"), or that you provide to us, will be processed by us. By "Personal Information", we mean any information which, either alone or in combination with other data, enables you to be directly or indirectly identified, for example your name, email address, username, contact details, or any unique identifier such as an IP address, device ID or another online identifier.

Due to the anonymity of X11, the Website minimizes the amount of Personal Information collected from you. Please read the following carefully to understand what data we collect, how that data is used and the ways it can be shared by us. If you do not wish for your Personal Information to be used in the ways described within this Privacy Policy then you should not access or use the Website or use any of the services, functions, or features offered on the Website.

1. What information do we collect?

1.1. Information you give us.

This is information about you that you give us when: interact with the Website.

1.2. Information we collect about you.

Each time you use the Website, we may automatically collect the following information, which may be considered to be Personal Information when combined with other information about you: technical information, including the Internet protocol (IP) address used to connect your computer or another device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and information about your visit, including the dates and times you use the Website length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.

1.3. Special categories of data:

We do not collect any special categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data). We do not collect any information related to your wallet, including your keystore file, password, mnemonic phrase, and private key.

2. Purposes for which we collect your Personal Information.

If you wish to transact on and use the Website or use the Services, Company will collect information about you for the purposes set out below. Information you provide to us may be used to:

- 2.1. establish and maintain a responsible commercial relationship with you;
- 2.2. understand your needs and your eligibility for products and services;

- 2.3. provide information to you about developments and new products, including changes and enhancements to the Website;
- 2.4. develop, enhance, and market products and services, and provide products and services to you;
- 2.5. process billing and collection of any fees;
- 2.6. conduct surveys and get feedback from you;
- 2.7. deliver products and services to you;

We use IP addresses to analyze trends, administer the Website, track user movements, and gather broad demographic information for aggregate use. For systems administration and detecting usage patterns and troubleshooting purposes, our web servers also automatically log standard access information including browser type, access times/open mail, URL requested, and referral URL. This information is not shared with third parties and is used only within Company on a need-to-know basis. Company reserves the right to block access for any user accessing the Website via a proxy service intending to conceal originating identity.

3. Legal bases on which we process your Personal Information.

We will process your Personal Information on the following grounds:

- 3.1. where it is necessary for us to perform pursuant to our contract with you or in your interests; and/or
- 3.2. where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Legitimate interests mean the interests of our organization to conduct and manage our business to enable us to better serve you and provide you with a secure experience on the Website.
- 3.3. we ensure that we balance any potential impact on you and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

4. Security and confidentiality.

Company is committed to protecting your privacy. Internally, only people with a business need to know Personal Information, or whose duties reasonably require access to it, are granted access to users' Personal Information. Such individuals will only process your Personal Information on our instructions and are subject to a duty of confidentiality.

The Website's systems and data are reviewed periodically to ensure that you are getting a quality service and that leading security features are in place. We have put in place procedures to deal with any actual or suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

5. Disclosures.

You agree that we have the right to share your Personal Information with:

5.1. Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries including their respective contractors, affiliates, employees or representatives

5.2. Our service providers, to the extent necessary to supply the Services to you;

5.3. Selected third parties, including identity verification sites and analytics and search engine providers that assist us in the improvement and optimization of the Services. Authorities and law enforcement agencies worldwide either when ordered to do so or on a voluntary basis if this appears reasonable and necessary to us.

6. Transfers.

Personal Information and other data may be exported outside of the jurisdiction in which you reside. Your Personal Information may be processed and stored in a foreign country. Under those circumstances, the governments, courts, law enforcement, or regulatory agencies of that country or those countries may be able to obtain access to your Personal Information through foreign laws. You need to be aware that the privacy standards of those countries may be lower than those of the jurisdiction in which you reside.

Unfortunately, the transmission of information via the Internet is not completely secure. While we do our utmost to protect your Personal Information, we cannot guarantee the security of your data transmitted to us over email or through the Website; any transmission is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorized access.

7. Your data protection rights

Data protection laws provides individuals with certain rights in relation to their personal data. The following right are exercisable by making a request to us at x@bank11.io. Usually we will have one month to respond to any such request. In summary, you have a right to:

- request information about Personal Data we collect, process, use and store;
- request that we correct Personal Data that we store;
- object to our use of Personal Data for direct marketing;
- object profiling of the collected Personal Data;
- request we transfer your Personal Data to another party where technically feasible;
- request we erase your Personal Data completely without undue delay.

You understand, agree and accept that some of your personal data might and will be placed and stored in the crypt-on platform's blockchain whose technology does not allow deleting any files stored therein. you understand and accept that the above may violate your right to be forgotten and therefore waive the right to the maximum extent permitted by any applicable law.

8. Changes To Our Privacy Policy

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you anonymously. Please check back frequently to see any updates or changes to our Privacy Policy.

9. Contacts

Questions, comments, and requests regarding this Privacy Policy should be addressed to x@bank11.io.