



# PRIVACY POLICY

Effective date: 15<sup>th</sup> April 2020

## Content

1. About us
2. Overview
3. Data We Collect- Personal and Business
4. How We Use Personal Data
5. How We Disclose Personal Data
6. Your Rights and Choices
7. Security and Retention
8. Data Transfers
9. Updates To this Privacy Policy
10. Links to other websites
11. Jurisdiction-specific Provisions
12. Contact Us

## 1. About us

Cannyx Markets owned and operated by Cannyx Markets UK Ltd and its affiliates (collectively “Cannyx Markets”, “we” and “us”) in respect your privacy. We offer a Cannabinoid Market Venue that enable market participants (buyers and sellers) to safely conduct online transactions via [www.cannyxmarkets.com](http://www.cannyxmarkets.com).

## 2. Overview

This Privacy Policy describes the types of *Personal Data* we collect during the registration process for Members who wish to join our online Trading Venue (“Cannyx Markets”) which is accessed via our main website at [cannyxmarkets.com](http://cannyxmarkets.com), as well as other services that we enable Members to access, such as Market Intelligence (collectively, our “Sites”). This policy also describes how we use Personal Data, with whom we share it, data storage, security your rights and choices. ***This policy does not apply to third-party websites, products, or services which***



*may offer links to their respective Services or Sites, and you should consider their privacy practices carefully.*

### **3. Data we collect – personal as well as business**

#### **a. Public visitors**

If you are a Visitor, Cannyx Markets will generally not collect your Personal Data directly from you. Your agreement with the relevant Cannyx Markets, should explain how Cannyx Markets shares your Personal Data among its Members and third party service providers, and if you have questions about this sharing, then you should direct those questions to Cannyx Markets by writing to them –

[enquiries@cannyxmarkets.com](mailto:enquiries@cannyxmarkets.com)

If you are a Visitor , when you make payments or conduct transactions through a Cannyx Markets' website or application, we will receive your transaction information. The information that we collect will include payment method information (such as credit or debit card number, or bank account information), purchase amount, date of purchase, and payment method if you decide to purchase any services or product from the Market Intelligence section of our site.

When you make a transaction, we may also receive your name, email, billing or shipping address and in some cases your transaction history to authenticate you.

#### **b. Membership - personal data that we collect about you**

Personal Data is any information that relates to an identified or identifiable individual which will be provided at the time of Registration as a Member. The Personal Data that you provide directly to us through our Site as part of your member registration will be apparent from the context in which you provide the data.

In particular:

- When you register for a Cannyx Markets membership as a business entity and if you are an officer of the company, we collect your full name, email address, and account log-in credentials.
- When you respond to Cannyx Markets emails or surveys we collect your email address, name and any other information you choose to include in the body of your email or responses.
- If you contact us by phone, we will collect the phone number you use to call Cannyx Markets . If you contact us by phone as a Cannyx Markets member, we may collect additional information in order to verify your identity.



- If you are a Cannyx Markets member, and registered officer of the company, you will provide your contact details, such as name, postal address, telephone number, and email address. As part of your business relationship with us, we may also receive financial and personal information about you, such as your date of birth and government identifiers associated with you and your organization (such as your social security number, tax number, or Employer Identification Number).
- When we conduct fraud monitoring, prevention, detection, and financial compliance activities, we will receive Personal Data from you and about you from the business that you represent and also from our business partners, financial service providers, credit agencies, identity verification services, and publicly available sources (e.g., name, address, phone number, country), as necessary to confirm your identity and prevent fraud.
  - Our fraud monitoring, detection and prevention services may use technology or third-party providers that helps us assess the risk associated with an attempted transaction that is enabled on the Cannyx Markets 's website or the application that collects information.
  - You may also choose to submit information to us via other methods, including: (i) in response to marketing or other communications, (ii) through social media or online forums, (iii) through participation in an offer, program or promotion, (iv) in connection with an actual or potential business relationship with us, or (v) by giving us your business card or contact details at trade shows or other events.

### **c. Information that we collect automatically on our Site**

Our Site use cookies and other technologies to function effectively. These technologies record information about your use of our Site, including:

- Browser and device data, such as IP address, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons and the language version of the Sites you are visiting;
- Usage data, such as time spent on the Sites, pages visited, links clicked, language preferences, and the pages that led or referred you to our Site.



- We may use Google Analytics or similar solutions on our Site to help us analyse Your use of our Site and diagnose technical issues.

## **4. How we use Personal Data**

### **a. Our products and services.**

We take guidance to ensure that our use of your Personal Data is compliant with applicable law. We use Personal Data to facilitate the business relationships we have with our Member, to comply with other legal obligations, and to pursue our legitimate business interests. We also use Personal Data to avail our services as well as to share this with other members of Cannyx Markets if required to do so in conducting a transaction.

### **b. Marketing and events-related communications.**

We may send you email marketing communications about Cannyx Markets services. We may also invite you to participate in our events or surveys, or otherwise communicate with you for marketing purposes, provided that we do so in accordance with the consent requirements that are imposed by applicable law. When we collect your business contact details through our participation at trade shows or other events, we may use the information to follow-up with you regarding an event, send you information that you have requested on our products and services and, with your permission, include you on our marketing information campaigns.

### **c. Interest-based advertising.**

You may see our ads on other websites or mobile apps because we participate in advertising networks. Ad networks allow us to target our messaging to Members based on a range of factors, including demographic data, Member' inferred interests and browsing context (for example, the time and date of your visit to our Site , the pages that you viewed, and the links that you clicked on). This technology also helps us track the effectiveness of our marketing efforts and understand if you have seen one of our advertisements. We work with Google AdWords, other advertising networks for promoting our services.

## **5. How we disclose Personal Data**

Cannyx Markets does not sell or rent Personal Data to marketers or unaffiliated third parties. We share your Personal Data with trusted entities, as outlined below.



**a. Cannyx Markets Members.** We share Personal Data with other Cannyx Markets members in order for those parties to feel secure in transacting with You and for internal administration purposes.

**b. Service providers.** We share Personal Data with a select number of our service providers. We have service providers that provide services on our behalf, such as identity verification services, website hosting, data analysis, information technology and related infrastructure, email delivery, and auditing services. These service providers may need to access Personal Data to perform their services. We authorize such service providers to use or disclose the Personal Data only as necessary to perform services on our behalf or comply with legal requirements. We require such service providers to contractually commit to protect the security and confidentiality of Personal Data they process on our behalf. Our service providers are predominantly located in the UK, European Union and the United States of America.

**c. Business partners.** We share Personal Data with third party business partners when this is necessary to provide our Services to our Member. Examples of third parties to whom we may disclose Personal Data for this purpose are Cannyx Members, banks and payment method providers (such as credit card networks) where we provide payment processing services, and the professional services firms that we partner with to deliver an end to end settlement and clearing services which may include banks, logistic company or quality assurance service providers and product certifying agencies.

**d. Third parties authorised by our Member.** We share data with parties directly authorised by a Member to receive Personal Data, such as when a Member authorises a third party application provider to access the Member's Cannyx Markets membership account. The use of Personal Data by an authorised third party is subject to the third party's privacy policy.

**e. Cannyx Corporate structure.** In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we may share Personal Data with third parties for the purpose of facilitating and completing the transaction.

**f. Compliance and harm prevention.** We share Personal Data as we believe necessary: (i) to comply with applicable law. (ii) to enforce our contractual rights; (iii) to protect the rights, privacy, safety and property of Cannyx Markets, you or others;



and (iv) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country.

## 6. Your rights and choices

You have choices regarding our use and disclosure of your Personal Data:

Exercising the right to know. You may request, up to twice in a 12-month period, the following information about the personal information we have collected about you during the past 12 months:

- the categories and specific pieces of personal information we have collected about you;
- the categories of sources from which we collected the personal information;
- the business or commercial purpose for which we collected the personal information;
- the categories of third parties with whom we shared the personal information; and
- the categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.
- Exercising the right to delete. You may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.
- Exercising the right to opt-out. You may request to opt out as a Member of Cannyx Markets.
- Non-discrimination. You may not be discriminated against for exercising these rights.

**a. Opting out of receiving electronic communications from us.** If you no longer want to receive marketing-related emails from us, you may opt-out via the unsubscribe link included in such emails. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages that are required to provide you with our Services.



**b. How you can see or change your account Personal Data.** If You would like to review, correct, or update Personal Data that You have previously disclosed to us, You may do so by editing your profile by signing in to your Cannyx Markets membership account. or by contacting us – [enquiries@cannyxmarkets.com](mailto:enquiries@cannyxmarkets.com)

**c. Your data protection rights.** Depending on your location and subject to applicable law, you may have the following rights with regard to the Personal Data we control about you:

- The right to request confirmation of whether Cannyx Markets processes, personal data relating to you, and if so, to request a copy of that Personal Data;
- The right to request that Cannyx Markets corrects or updates your Personal Data that is inaccurate, incomplete or out dated;
- The right to request that Cannyx Markets remove your Personal Data in certain circumstances provided by law;

The right to request that Cannyx Markets restrict the use of your Personal Data in certain circumstances, Where the processing of your Personal Data is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your Personal Data on grounds relating to your particular situation.

**d. Process for exercising data protection rights.** In order to exercise your data protection rights, you may contact Cannyx Markets as described in the [Contact Us](#) section below.

We will comply with your request to the extent required by applicable law. If you feel that you have not received a satisfactory response from us, you may consult with the data protection authority in your country.

If we no longer need to process Personal Data about you in order to provide our Services or our Site , we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.



For example, if you are making, or have made, a purchase from Cannyx Markets, Market Intelligence section on our website, and you were directed to a payment processor a that is related to the payment information that you provided as part of the purchase transaction, then you should address your request directly to the processing merchant.

To submit a request to exercise any of the rights described above, you may contact Cannyx Markets at [enquiries@cannyxmarkets.com](mailto:enquiries@cannyxmarkets.com).

## **7. Security and retention.**

We make every effort to ensure a level of security appropriate to the risk associated with the processing of Personal Data. We maintain administrative measures designed to protect Personal Data within our organization against unauthorized access, destruction, loss, alteration or misuse. Your Personal Data is only accessible to a limited number of personnel who need access to the information to perform their duties. We do not guarantee that your data is 100% secure. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure.

If you have reason to believe that that your data has been compromised (for example, if you feel that the security of your account has been compromised), you must contact us immediately.

If you are a Cannyx Markets Member, we retain your Personal Data as long as we are providing the Services to you. We retain Personal Data after we cease providing Services to you, even if you close your Cannyx Markets account, to the extent necessary to comply with our legal and regulatory obligations, and for the purpose of fraud monitoring, detection and prevention. We also retain Personal Data to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods that we use. . Where we retain data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

## **8. Data transfers**

We are a global business. Personal Data may be stored and processed in any country where we have operations or where we engage service providers. We may transfer Personal Data that we maintain about you to recipients in countries other



than the country in which the Personal Data was originally collected, including to the United Kingdom. Those countries may have data protection rules that are different from those of your country. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your Personal Data remains protected to the standards described in this Privacy Policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Data. If you are located in the USA, European Economic Area (“EEA”), or Switzerland, we comply with applicable laws to provide an adequate level of data protection for the transfer of your Personal Data.

The Services are not directed to individuals under the age of eighteen (18), and any one attempting to use Minor’s data will be restricted from the use of Cannyx Markets sites and they are strictly advised not provide Personal Data through the Services.

## 9. Updates - Privacy Policy and notifications

We may change this Privacy Policy from time to time to reflect new services, changes in our Personal Data practices or relevant laws. Any changes are effective when we post the revised Privacy Policy on the Services. We may provide you with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on our website and, if you are a Member, by contacting you through your Cannyx Markets Member Dashboard, email address and/or the physical address listed in your Cannyx Markets account.

## 10. Links to other websites

Cannyx Markets may provide other third parties to publish either advertisements or directory of services linking them to other websites. These websites may operate independently from us and may have their own privacy notices or policies, which we strongly recommend you to review. ***If any linked website is not owned or controlled by us, we are not responsible for its content, any use of the website or the privacy practices of the operator of the website.***

## 11. Jurisdiction-specific provisions

Residents of the USA, European Economic Area (EEA), the UK and Switzerland. The entity responsible for the collection and processing of Personal Data for residents of the USA, EEA, the UK and Switzerland is Cannyx Markets UK Ltd., a company



incorporated in United Kingdom. To exercise your rights, the Data Protection Officer may be contacted via [compliance@cannyxmarkets.com](mailto:compliance@cannyxmarkets.com).

## **12. Contact us**

If You have any questions or complaints about this Privacy Policy, please contact us either by sending physical mail to:

**Cannyx Markets UK Ltd, Alexandra House, 43 Alexandra Street, Nottingham, England, NG5 1AY**

or electronically to mail: [enquiries@cannyxmarkets.com](mailto:enquiries@cannyxmarkets.com)