

## Privacy Policy

**Your privacy is important to us!**

**Effective Date:** 28. August 2019

21 Consulting GmbH ("us", "we", or "our") operates the <https://cryptotax.io> website and the web application CryptoTax (hereinafter, collectively referred to as the "Service" or "CryptoTax").

This privacy policy (the "Policy", "Privacy Policy") informs you of our policies regarding the collection, use, processing and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection, use and methods of disclosure of information and personal data in accordance with this Policy. By using CryptoTax, you warrant that you have reviewed this Privacy Policy and agree to it in full. If you do not understand or agree with the Privacy Policy or parts of it please stop using CryptoTax and exit immediately. You may withdraw your consent to this Policy at any time by messaging us at [contact@cryptotax.io](mailto:contact@cryptotax.io). You acknowledge and agree that it is up on you to remove any cookies placed on any device during your use of CryptoTax after your withdrawal of consent. Furthermore, you agree that your withdrawal of consent does not touch the legitimacy of data collection, processing and usage which may have taken place before the withdrawal. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible at <https://cryptotax.io/en-us/legal/>.

For us your privacy is one of our biggest concerns. This Policy is meant to explain to you what personal information we might collect, for which purposes we need such information, which information may be shared with other parties, how we protect your data, the types of cookies we might use and how you can reject those and to inform you about your rights in regards to your personal information. Additionally, we want to inform you on how you can actively avoid to disclose information to us during the use of the Service.

### 1. Definitions

#### **Service**

Service is the <https://cryptotax.io> website and the web application CryptoTax operated by 21 Consulting GmbH

#### **Personal Data**

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

#### **Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

### **Cookies**

Cookies are small files stored on your device (computer or mobile device).

### **Data Controller**

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

### **Data Processors (or Service Providers)**

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

### **Data Subject (or User)**

Data Subject is any living individual who is using our Service and is the subject of Personal Data. For the purpose of this Privacy Policy the Data Subject is you.

## **2. Information Collection and Use**

We collect several different types of information for various purposes to provide and improve our Service to you. We will collect and process such data in a transparent, lawful and for the usage of the Service appropriate way. There are different types of data collected:

### **2.1 Personal Data**

While using our Service, we may ask you to provide us or offer the possibility to provide us with certain personally identifiable information that can be used to contact or identify you (the "Personal Data"). Personally identifiable information may include, but is not limited to:

Necessary data to register for the CryptoTax web application:

- Email address
- Tax country

Voluntary data which could be transferred to us during the use of the Service:

- Name and Surname
- Telephone number
- Blockchain wallet and other wallet information
- General portfolio information
- API access to certain accounts (e.g. accounts on cryptocurrency exchanges)

Data in regards to payment and billing:

- Billing address
- Credit card number
- PayPal account email address

Other data:

- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you, if you opted in for such notifications. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email we send.

## 2.2 Usage Data

We may also collect information on how the Service is accessed and used ("the Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

## 2.3 Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

### **3. Use of Data**

In the context of our strong efforts to protect your data privacy we only use your personal data for explicitly specified and legitimate purposes for which you provided such data to us. Besides the main purpose of offering you the use of CryptoTax and other services you explicitly requested 21 Consulting GmbH may use the collected data for the following purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- Communicating with you regarding your use of our Service
- Enforcing our Terms and Conditions
- Analyzing data in anonymized and aggregated manner together with other user data
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

If we plan to use your data for other than the above stated purposes we will inform you first and you will be able to decline or withdraw your consent for the usage of your Personal Data for such additional purposes.

### **4. Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)**

If you are from the European Economic Area (EEA), 21 Consulting GmbH legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

21 Consulting GmbH may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- For payment processing purposes
- To comply with the law

## **5. Retention of Data**

21 Consulting GmbH will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

21 Consulting GmbH will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

## **6. Transfer of Data**

Your information, including Personal Data, may be transferred to - and maintained on - computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside Germany and choose to provide information to us, please note that we transfer the data, including Personal Data, to Germany and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

21 Consulting GmbH will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **7. Disclosure of Data**

### **7.1 Business Transaction**

If 21 Consulting GmbH is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

### **7.2 Disclosure for Law Enforcement**

Under certain circumstances, 21 Consulting GmbH may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **7.3 Legal Requirements**

21 Consulting GmbH may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of 21 Consulting GmbH
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## **8. Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. You understand and agree that we are not liable for any theft, loss, unauthorized access, copying, use, disclosure or modification of Personal Data outside of our reasonable control.

In the unlikely case of a Personal Data breach, we will notify (i) you as soon as possible via email, (ii) the relevant authorities without undue delay and (iii) immediately take reasonable actions to limit the breach.

## **9. Our Policy on "Do Not Track" Signals under the California Online Protection Act (CalOPPA)**

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **10. Your Data Protection Rights under the General Data Protection Regulation (GDPR)**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. 21 Consulting GmbH aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us at [contact@cryptotax.io](mailto:contact@cryptotax.io).

In certain circumstances, you have the following data protection rights:

**The right to access, update or delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

**The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.

**The right to object.** You have the right to object to our processing of your Personal Data.

**The right of restriction.** You have the right to request that we restrict the processing of your personal information.

**The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

**The right to withdraw consent.** You also have the right to withdraw your consent at any time where 21 Consulting GmbH relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## **11. Service Providers**

We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **11.1 Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Service.

#### **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

## **Hotjar**

We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy which can be viewed at <https://www.hotjar.com/legal/policies/privacy>.

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites at <https://www.hotjar.com/legal/compliance/opt-out>.

## **11.2 Behavioral Remarketing**

21 Consulting GmbH uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

### **Google Ads (AdWords)**

Google Ads (AdWords) remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page:

<http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

### **Bing Ads Remarketing**

Bing Ads remarketing service is provided by Microsoft Inc.



You can opt-out of Bing Ads interest-based ads by following their instructions:  
<https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>  
You can learn more about the privacy practices and policies of Microsoft by visiting their Privacy Policy page: <https://privacy.microsoft.com/en-us/PrivacyStatement>

### **Twitter**

Twitter remarketing service is provided by Twitter Inc.  
You can opt-out from Twitter's interest-based ads by following their instructions:  
<https://support.twitter.com/articles/20170405>  
You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

### **Facebook**

Facebook remarketing service is provided by Facebook Inc.  
You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>  
To opt-out from Facebook's interest-based ads, follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>  
Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.  
For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

## **11.3 Payments**

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

### **Chargebee**

Their Privacy Policy can be viewed at <https://www.chargebee.com/privacy/>

### **Stripe**

Their Privacy Policy can be viewed at <https://stripe.com/us/privacy>

### **PayPal / Braintree**

Their Privacy Policy can be viewed at  
<https://www.paypal.com/webapps/mpp/ua/privacy-full>

## **11.4 Other Providers**

We further may use data storage providers like Amazon Web Services (AWS), web hosting providers, newsletter providers and other service providers, which help us optimizing and operating the Service and/or other parts of our business.

### **reCAPTCHA**

Our website uses the reCAPTCHA service by Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; “Google”).

Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland) is the data controller responsible for your data if you have your habitual residence in the European Economic Area or Switzerland. Google Ireland Limited is therefore the company affiliated with Google which is responsible for processing your data and for compliance with applicable data protection laws.

The request serves to distinguish whether the input was made by a human or automatic machine processing. For this purpose, your input will be transmitted to Google and used by them further. In addition, the IP address and any other data required by Google for the reCAPTCHA service will be transferred to Google. This data will be processed by Google within the EU and potentially also in the USA. Transmission of data to the USA is covered by an adequacy decision by the European Commission, the “Privacy Shield”. Google participates in “Privacy Shield” and has submitted to its requirements.

Processing is carried out on the basis of Article 6(1)f) GDPR due to our legitimate interest in protecting our website from automated spying, misuse and SPAM.

You can find more detailed information on Google reCAPTCHA and the associated data protection declaration at:

<https://www.google.com/recaptcha/intro/android.html> and  
<https://www.google.com/privacy>.

### **YouTube**

Our website uses the function for the embedding of YouTube videos provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland; “YouTube”). YouTube is an affiliated company of Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; “Google”).

This feature shows YouTube videos in an iFrame on the website. The option “advanced privacy mode” is enabled here. This prevents YouTube from storing

information on visitors to the website. It is only if you watch a video that information is transmitted to and stored by YouTube.

Your data may also be transmitted to the USA. Following the US-EU Data Protection Agreement, Google has become “Privacy Shield” certified and is therefore obliged to observe European data protection laws.

Further information on the data collected and used by YouTube and Google, your rights and privacy can be found in YouTube’s privacy policy (<https://policies.google.com/privacy?hl=en>).

## **12. Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## **13. Children's Privacy**

Our Service does not address anyone under the age of 18 (the "Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.

## **14. Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

If appropriate, we will let you know via email and/or a prominent notice on our Service prior to the change becoming effective. Also, the "effective date" at the top of this Privacy Policy will be updated.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **15. Interaction with other Privacy Policies**

There may be additional privacy policies for CryptoTax, which shall primarily and additionally apply to Users from certain residence states. If you are a German resident, meaning you are

having your main residence in Germany our German privacy policy – which can be found at <https://cryptotax.io/rechtliche-hinweise/> - shall primary and additionally apply to you. I.e. if there are deviant provisions between this Policy and the German privacy policy the provisions of the German privacy policy shall apply. For anything not explicitly regulated in the German privacy policy the provisions of this Policy shall apply.

## **16. Contact Us**

If you have any questions about this Privacy Policy, please contact us by email at [contact@cryptotax.io](mailto:contact@cryptotax.io).