



Privacy Policy

QYT ÖÜ ("the Company") is the Investment Firm of the Estonia authorized and regulated by the 1415 Harju maakond, Tallinn, Lasnamäe Linnaosa, Peterburitee, 47.

coinmarketsolution.com is a website operated by QYT ÖÜ.

QYT ÖÜ is committed to protecting individuals' data in line with the requirements of applicable law. QYT ÖÜ commitment applies to all individuals whose personal data the Company may process. "Personal Data" means any information relating to an identified or identifiable natural person. The Company acts as a controller about such personal data.

This Privacy Policy or Notice describes what types of personal data we collect about you when you choose to use our services, how we will use your data, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them.

Please take the time to read and understand this policy. We may make changes to this Notice from time to time and you must check this Notice for any updates. Any personal information we hold will be governed by our current privacy notice. If we make a change that considers being important, we will communicate them to you.


Please note that this notice is addressed to customers and potential customers.



1. Personal Data that we may collect:

When you create an account on the CoinMarketSolution, we require you to provide your first and last name, e-mail address, details about your financial status, your residential address, phone number, date of birth, a copy of your national identity card or passport or driving license, a copy of a recent utility bill/bank statement (or similar) as evidence of your residential address, credit card or bank card details, Tax residence, and Tax Identification Number, profession and employment details, knowledge and experience in trading, risk tolerance, and risk profile and other information we may consider necessary to our functions and activities and to be in a position and be permitted to provide our services to you.

If the Company requests you to provide it with personal data and you fail to do so, the Company may not be in a position to provide a service and/or enter into an agreement with you, in which case it will inform you accordingly.

The above mentioned data are collected by the Company when you are going to open a trading account

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with the Company. It is required by the AML Law (the Prevention and Suppression of Money laundering and Terrorist Financing Law as amended from time to time) and that the Company collects the necessary data for verifying your identity, constructing your economic profile, monitoring your account and verifying the source of funds (when it is necessary). Additionally, we use this data to set up and administer your trading account, and to provide technical and customer support.

We use cookies to store and collect information about your use of our Website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our Website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience.

If you are a corporate client we are required to collect information related to the legal entity (e.g. corporate and constitutional documents), additional personal information on the shareholders, directors and other officers that we deem as necessary to be compliant with our legal and regulatory requirements.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you concerning the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us.

Legal Ground for Personal Data processing:

We may process your data for one or more lawful bases of the processing ("Lawful Basis") depending on the specific purpose for which we are using your data.


The Lawful Basis is the following:



- to perform our contractual obligations towards you
- to be compliant with applicable legal and regulatory requirements
- to pursue our legitimate interests

Where our use of your personal information does not fall under one of the abovementioned Lawful Bases we will require you to provide your consent. Such consent shall be freely given by you and you will have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice or by unsubscribing from email lists.

2. How we use your data:

Client information which the Company holds is to be treated by the Company as confidential and will not

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be used for any purpose other than in connection with the provision, administration, and improvement of the Services, anti-money laundering, and due diligence checks, for research and statistical purposes and marketing purposes.

Information already in the public domain, or already possessed by the Company without a duty of confidentiality will not be regarded as confidential. The Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details) in the following circumstances:

- (a) where required by law or a court order by a competent Court.
- (b) where requested by FSA or any other regulatory authority having control or jurisdiction over the Company or the Client or their associates or in whose the territory the Company has Clients.
- (c) to government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests;
- (d) to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- (e) where necessary for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or governmental authority;
- (f) to such an extent as reasonably required to execute Orders and for purposes ancillary to the provision of the Services;
- (g) to payment service providers and banks processing your transactions;
- (h) to auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes; provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well;
- (i) only to the extent required and only the contact details to other service providers who create, maintain or process databases (whether electronic or not), offer record-keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use Client information or get in touch with the Client or improve the provision of the Services under this Agreement.

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(j) only to the extent required, to other service providers for statistical purposes to improve the Company's marketing, in such a case the data will be provided in an aggregate form.

(k) only to the extent required, to market research call centers that provide telephone or email surveys with the purpose to improve the services of the Company, in such a case only the contact details will be provided.

(l) where necessary for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority.

(m) to anyone authorized by you.

(n) to an Affiliate or introducing broker of the Company or any other company in the same group as the Company.


(o) to any third-party where such disclosure is required to enforce or apply our Terms and Conditions or other relevant agreements.



(p) to successors or assignees or transferees or buyers, with ten Business Days prior Written Notice to the Client; this will happen if the Company decides to sell, transfer, assign or novate to a third party any or all of its rights, benefits or obligations under the Agreement with you or the performance of the entire Agreement subject to providing 15 Business Days Prior Written Notice to the Client. This may be done without limitation in the event of merger or acquisition of the Company with a third party, the reorganization of the Company, winding up of the Company or sale or transfer of all or part of the business or the assets of the Company to a third party.

3. The safety of your data

QYT ÖÜ takes the appropriate measures to ensure a level of enhanced security to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

The Company implements appropriate technical and organizational measures such as data encryption, access management procedure, clean desk policy, business continuity, and disaster recovery, IT systems risk assessment, physical and logical access segregation, a process in case of personal data breach policy,

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etc. Additionally, the Company limits access to the Client's data to those employees, agents, contractors and other third parties who have a business need to know. They will only process the Client's data on the Company's instructions and they are subject to a duty of confidentiality.

Your data may be stored electronically or in paper form.

4. How we treat your data for marketing activities and whether profiling is used for such activities

We may process your data to tell you about products, services, and offers that may be of interest to you or your business. The personal data that we process for this purpose consists of information you provide to us and the data we collect and/or infer when you use our services. This information helps the Company to improve its services, customize browsing experience and enable it to inform its clients of additional products, services or promotions relevant to clients. In some cases, profiling is used, i.e. we process your data automatically to evaluate certain personal aspects to provide you with targeted marketing information on products.

We can only use your data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so.

5. Your rights as a data subject


Right of access – you have the right to request from us to provide you with a copy of the personal data that we hold about you.



Right of rectification – you have a right to request from us to correct the personal data we hold about you that is inaccurate or incomplete.

Right to be forgotten – you have a right to request from us in certain circumstances to erase your data from our records. In case that these circumstances apply to your case and provided that no exception to this obligation applies the Company acting as your controller will erase your data from its records.

Right to restriction of processing – you have a right to request from us where certain conditions apply, to restrict the processing of your data.

Right of portability – you have the right to request from us where certain conditions apply, to have the data we hold about you transferred to another organization. Where these conditions apply the Company will transfer your data to another organization.

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Right to object – you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

The right to request the transfer of your data to you or a third party. We will provide to you, or a third party you have chosen, your data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

The right to withdraw consent where we are relying on consent to process your data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.


We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case, we will send you a fee request which you will have to accept before us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.



6. Contacting us about this Policy or making a complaint

If you have any queries about the contents of this Policy or wish to inform us of a change or correction to your data would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:

E-mail: support@coinmarketsolution.com

We will try to respond to your request without undue delay and in any case within one month of receipt of the request. In case your request takes us longer than one month we will notify you accordingly and keep you updated. In this respect, it should be noted that the information to be provided as a result of exercising your right shall be provided free of charge. Nonetheless and where requests are manifestly unfounded or excessive, in particular, because of their repetitive character, the Company may either:

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(a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested;
or (b) refuse to act on the request.

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