

## PERSONAL DATA PROTECTION POLICY

pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as "GDPR")

### 1 INTRODUCTORY PROVISIONS

- 1.1 Madison Six j. s. a., with its registered office at Slávičie údolie 106, 811 02 Bratislava - Staré Mesto district, ID No.: 56 856 229, registered in the Commercial Register of the Municipal Court Bratislava III, Section Sja, insert no. 381/B (hereinafter referred to as "Madison Six" or "Madison Six") is a provider of crypto-asset services based on a licence to provide crypto-asset services granted by the National Bank of Slovakia (hereinafter referred to as "NBS") to the extent specified in NBS Decision No. 100-001-025-213, issued under No.: NBS1-000-112-470 on 17 December 2025, pursuant to Regulation (EU) (EU) 2023/1114 of 31 May 2023 on markets in crypto-assets (hereinafter referred to as the "MiCA Regulation"), which entered into force on 18 December 2025. At the same time, Madison Six is authorised to provide crypto-asset services cross-border throughout the European Union (hereinafter referred to as the "EU"), including the European Economic Area (hereinafter referred to as the "EEA"), through the right of establishment.
- 1.2 For the purposes of the GDPR, the controller of any personal data provided by the data subject is Madison Six, which provides the following crypto-asset services within the meaning of the MiCA Regulation:
- custody and management of crypto-assets on behalf of clients;
  - exchange of crypto-assets for funds;
  - exchange of crypto-assets for other crypto-assets;
  - executing orders relating to crypto-assets on behalf of clients;
  - receiving and transmitting orders relating to crypto-assets on behalf of clients;
  - providing crypto-asset transfer services on behalf of clients
- (hereinafter collectively referred to as "services").
- 1.3 Capitalised terms not defined in this Privacy Policy shall have the meanings set out in Madison Six's Terms and Conditions for Crypto Asset Services, which are available on the website [madisonsix.com](https://www.madisonsix.com) or [crypto4me.eu](https://www.crypto4me.eu).
- 1.4 This Privacy Policy (hereinafter referred to as the "Privacy Policy") forms the basis for the processing of all personal data obtained in connection with the use of the website operated by Madison Six at [www.madisonsix.com](https://www.madisonsix.com) and [www.crypto4me.eu](https://www.crypto4me.eu), as well as the conclusion of a contractual relationship between you and Madison Six, as well as the conclusion of a contractual relationship between you and Madison Six. Its purpose is to inform clients or other persons whose personal data we process in

connection with the provision of our services (i.e. Data Subjects) in particular about what data we process, for what purposes we process it, what the legal basis for its processing is, to whom we provide the processed data, but also how long we store the data, or what rights Data Subjects have in relation to the processing of personal data.

- 1.5 The processing of personal data and ensuring its protection is very important to us. When processing personal data and ensuring its protection, we proceed in accordance with the applicable legal regulations in the Slovak Republic, in particular in accordance with the GDPR, Act No. 18/2018 Coll. on the protection of personal data and on amendments to certain acts (hereinafter referred to as the "Personal Data Protection Act") and the MiCA Regulation with regard to the protection of data subjects, transparency, security measures and the reporting of security incidents.
- 1.6 We use a variety of security technologies and procedures to protect your personal data from unauthorised access, use or disclosure. We store your personal data on computer servers in a controlled and secure environment, protected from unauthorised access, use or disclosure. We apply high standards of cyber and information security in accordance with the requirements of the MiCA Regulation and the GDPR. When processing and transferring personal data and data related to crypto assets, we use advanced encryption mechanisms, multi-level authentication methods and hardware security features.
- 1.7 This version of the document is valid from 05.01.2026. Information about any changes in the processing of personal data will be provided by updating this document, which will also be published on our website.

## 2 BASIC TERMS

- 2.1 Terms with a capital or lowercase letter used in this Data Protection Policy have the following meanings:

**Personal data or data** is any information relating to an identified or identifiable natural person (hereinafter referred to as the "Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier, or reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

**Data subject** is a natural person whose personal data is processed, in particular clients, their representatives, or other persons within the meaning of the AML Act

The controller  
and means

is anyone who, alone or jointly with others, determines the purposes for processing personal data and processes personal data on their own behalf; for the purposes of this document, the controller is Madison Six

Processor

is an entity that processes personal data on behalf of the controller on the basis of its authorisation; for the purposes of this document, processors are considered to be entities that provide their services to Madison Six on a contractual basis

Recipient

is, within the meaning of the GDPR, any entity to which the processed personal data is provided; public authorities that may receive personal data in the context of a specific investigation in accordance with EU or Member State law are not considered recipients within the meaning of the GDPR

Processing  
or on sets of

is any operation or set of operations which is performed on personal data personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, searching, viewing, using, disclosing by transmission, dissemination or otherwise making available, aligning or combining, restricting, erasing or destroying, whether by automated or non-automated means

### 3 FROM WHOM WE OBTAIN PERSONAL DATA

We generally obtain personal data directly from the data subjects. In cases where the client is represented by another person, we may, where possible, obtain the client's personal data from that person acting on their behalf. We obtain some data from public registers (e.g. trade register, register of public sector partners) or from other registers to which we have access (e.g. data on sanctioned persons for the purpose of fulfilling obligations under the AML Act, etc.).

### 4 WHAT PERSONAL DATA WE PROCESS

#### 4.1 We only process data that is necessary to fulfil the purposes of processing within the meaning of this Data Protection Policy.

#### 4.2 In general, we process:

- general identification data (e.g. name, surname, academic title, date of birth, birth number),
- data from the person's identity document, including a copy of this document (e.g. type and number of identity document, facial image of the person),
- contact details (e.g. residential address, telephone number, e-mail address, address for delivery of documents),
- socio-demographic data (e.g. age, gender, nationality, employment information),
- other data whose processing is required by law (e.g. information about the person's political exposure, data on international sanctions imposed on the person that affect the level of care taken towards the person under the AML Act),
- economic data (balance on client wallets, bank account numbers, information on income) and payment information whenever you make a payment to us,
- audio recording of your voice in the event of contact via a call centre, if Madison Six has one set up,
- other data resulting from a submission by the data subject to Madison Six (e.g. when resolving complaints),
- data necessary to maintain a secure connection and protect the client (e.g. data about the device used to connect to the service, IP address).

4.3 In connection with fulfilling our obligations under the AML Act, other legal regulations or internal regulations and guidelines of Madison Six, we are entitled to request additional information from you for the purpose of verifying your identity and assessing business risk in accordance with the relevant legal regulations in the area of protection against money laundering and protection against terrorist financing, such as a copy of: (i) identity document; in the case of a legal entity, also identity documents of statutory bodies and identity documents of the ultimate beneficial owners of the legal entity, (ii) confirmation of permanent residence or other authorised residence (e.g. a duly issued invoice for energy supply, or a bank account statement showing identification details and the corresponding address, an extract from the population register, an extract from the Commercial Register or a similar register, (iii) a photograph of your likeness together with clearly legible data from your identity document, and (iv) information on the origin of the funds and assets that are the subject of or related to the services ordered.

4.4 When you visit our website, we may automatically collect information about you using Google Analytics to understand how you use our website. This information is collected and provided to us by Google LLC. as our data processor. If you do not want Google Analytics to be used in your browser, you can install the Google Analytics Opt-Out Browser Add-On or another similar tool.

4.5 We will only retain personal data for as long as necessary to fulfil the purposes for which it was collected, including any statutory obligations (e.g. limitation periods, taxes, obligations under the AML Act). After this period, the data will either be deleted or anonymised, unless further storage is required by law.

5 FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA AND WHAT IS THE LEGAL BASIS FOR THEIR PROCESSING

5.1 We process personal data only to the extent necessary and only on the following legal bases and for the following purposes:

- a) Necessity of processing for the performance of a contract concluded with the data subject, including so-called pre-contractual relations - Article 6(1)(b) of the GDPR: provision of services pursuant to Article 1.2 of this document and related activities

We process your personal data if it is necessary for the conclusion, performance, modification or termination of a contractual relationship with us. The conclusion and performance of the contract is only possible after opening your Account, and therefore we also process your email address (your login name) and password to the Account, as well as other personal data in accordance with Article 4.2 of this document. The duration of the processing of your personal data is determined by the duration of our contractual relationship. We may continue to process your personal data even after the termination of the contractual relationship on another legal basis.

- b) Ensuring compliance with legal regulations - Article 6(1)(c) of the GDPR

We process your personal data if it is necessary to fulfil our legal obligations (e.g. reporting obligations to the National Bank of Slovakia, tax administrator, further obligations in the area of tax administration and accounting, handling reports of anti-social activity (whistleblowing) and complaints, handling requests for cooperation from law enforcement authorities or other public authorities, filing criminal complaints, handling submissions from data subjects within the meaning of the GDPR, for archiving purposes). We also process your personal data for the purpose of complying with applicable legislation on the prevention of money laundering, the prevention of terrorist financing or any other criminal offence. In this regard, we may ask you to upload a copy of your identity document (passport or identity card) and fill in the relevant Identification Data or provide other information within the meaning of Madison Six's Terms and Conditions for Crypto Asset Services. We may disclose your personal data if necessary to comply with our legal obligations under law, court order or legal process. The duration of the processing of your personal data is determined by the duration of the specific legal obligations.

Failure to provide or providing false information by the client may result in the inability to use the services, refusal or blocking of a transaction, or blocking of the Account or termination of the contractual relationship in accordance with the legal

provisions or our terms and conditions. We store personal data processed under this point for the period prescribed by specific legal regulations.

c) Legitimate interests of Madison Six - Article 6(1)(f) of the GDPR

We may also process your personal data when it is necessary for the purposes of our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms. Our legitimate interests include the following:

Development, testing and maintenance of IT systems (interest in developing IT systems with regard to their functionality and the protection of data processed therein);

Court or enforcement proceedings (interest in protecting our property against non-fulfilment of contractual obligations by the persons concerned and interest in the payment of due receivables from the persons concerned, or interest in proving the validity of our claim against the persons concerned). Personal data is stored during ongoing proceedings concerning Madison Six's claim and subsequently for 10 years after their legal conclusion or after the disputed claim has been settled.

Contacting data subjects with service offers in the form of electronic messages (interest in offering additional services to existing clients; if you are our client, we may send you emails with information about our services similar to those you already use, and you can easily and free of charge unsubscribe from these messages at any time by clicking on the link in the email or by sending a message to:[info@madisonsix.sk](mailto:info@madisonsix.sk) ).

d) Consent of the data subject - Article 6(1)(a) of the GDPR

We may also process your personal data based on your consent, for example, to send you various types of marketing information (according to your selection), profiling, or using cookies, if such processing is not covered by another legal basis. You may withdraw this consent at any time without affecting the lawfulness of the processing carried out prior to its withdrawal.

We process personal data provided on the basis of consent for a period of 2 years from the date of consent, unless consent has been given for a different period. If consent is withdrawn before the expiry of this period, the data will only be processed until the withdrawal of consent.

- 5.2 The provision of personal data by the data subjects is necessary; without it, Madison Six would not be able to provide its services, i.e. it would not be able to enter into contractual relationships with clients, or Madison Six would be unable to fulfil its legal obligations. An exception is the processing of personal data based on the consent of the data subject.

persons, where the provision of personal data for processing based on consent is voluntary, and the data subject may withdraw their consent at any time.

- 5.3 We only store personal data for the time necessary to achieve the purpose of processing. In general, we store personal data for the duration of the contractual relationship with the client and subsequently for 10 years after its termination, unless another special period is specified in this document.

## 6 USE OF COOKIES

- 6.1 Cookies are short text files containing a small amount of information that are downloaded to the data subject's device when visiting a website. Cookies are then sent back to the website or another website that recognises them on each subsequent visit.

- 6.2 Cookies perform various tasks, such as enabling efficient navigation between web pages, remembering the preferences of the data subject, and generally improving the user experience. They can also ensure that advertisements displayed online are better tailored to the person and interests of the client or data subject.

- 6.3 The following cookies are used on our website:

essential cookies: these are necessary for the operation of the website, for example, they allow you to log in to secure areas of the site and other basic site functionality; this category of cookies is therefore essential for the operation of the website and cannot be disabled;

analytical/statistical cookies: enable the operator to improve the performance and functionality of the website, for example, to recognise and count the number of visitors and to monitor how visitors use the website; they help the operator improve the way the website works, for example by allowing users to easily find what they are looking for (they have the potential to profile the client); prior consent of the data subject is required to run these files;

advertising and marketing cookies: these are used to track preferences and also allow the display of advertisements and other content that best matches the client's interests and online behaviour; prior consent from the data subject is required to run these files.

- 6.4 By ticking the box in the cookie bar on the website, the data subject can give their consent to the use of analytical and advertising/marketing cookies (based on Article 6(1)(a) GDPR) or refuse them, or set the use of only some of these cookies. The data subject can always change the settings of these cookies in the settings at the bottom of the website, e.g. the consent given can be withdrawn at any time.

- 6.5 Further information about cookies and their current list can be found by the data subject via individual internet browsers, most often in the developer tools section, or at the following links:

[Internet Explorer](#)

[Google Chrome](#)

[Firefox](#)

[Safari](#)

[Opera](#)

[Microsoft Edge](#)

## 7 RECIPIENTS AND INTERMEDIARIES OF YOUR PERSONAL DATA

7.1 In general, personal data is intended for Madison Six, without the need to disclose it to other recipients or intermediaries, but in certain situations, its disclosure may occur and may even be necessary. In the event of data being provided to recipients or intermediaries, Madison Six ensures that the data is only provided to the extent necessary. Personal data is not disclosed by Madison Six.

7.2 Madison Six may designate intermediaries, i.e. entities that provide various services to Madison Six on a contractual basis and, as a result of providing these services, process personal data on its behalf as a controller and perform specific tasks related to the processing of your personal data in accordance with a personal data processing agreement or contractual terms and conditions that contain provisions on personal data protection and ensure an adequate level of protection.

7.3 We only select processors who provide sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the processing will meet the requirements of the GDPR and ensure the protection of your rights.

7.4 We use processors in accordance with Article 28 of the GDPR, who may collect and process your personal data on our behalf, particularly in the following areas:

ICT services: ICT service providers, in particular for the identification (verification) of clients and the checking of client entries in designated lists or registers by the company, providers of software, cloud (including e-mail services), security and IT infrastructure services, providers of security systems, systems for verifying transactions on the blockchain (DLT technology) and monitoring them, providing solutions for identity verification in crypto transactions, providers of comprehensive cyber security solutions, modern solutions for backup, recovery, replication and data protection across virtual, physical, cloud and SaaS environments, providers of security solutions focused on digital assets and blockchain technologies that ensure the protection, management and transfer of cryptocurrencies and other digital assets;

Domain and web hosting: domain registrar and web hosting provider (Websupport s. r. o.);

Contractual providers of legal, accounting and tax services;

Marketing: providers of marketing services, marketing tools and platforms (e.g. Facebook, Google).

## 8 TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

When processing personal data, we strive to minimise any transfer of personal data outside the EU/EEA. However, in the course of our business activities, we also use global service providers who may transfer personal data outside the EEA (listed in Article 7 of this document). In such cases, we ensure that the conditions of the GDPR for such processing are met and that the transfer takes place only on the basis of an adequacy decision by the European Commission pursuant to Article 45 of the GDPR or on the basis of standard data protection clauses pursuant to Article 46(2) of the GDPR (e.g. transfers to the USA).

## 9 RIGHTS OF DATA SUBJECTS

### 9.1 Under the GDPR, you have the following rights regarding the processing of your personal data:

**RIGHT OF ACCESS TO PERSONAL DATA:** Under this right, the data subject has the right to request confirmation from Madison Six as to whether it is processing their personal data and, if so, the data subject has the right to access the data being processed and the right to the information specified in Article 15 of the GDPR.

**RIGHT TO RECTIFICATION OF PERSONAL DATA:** Under this right, the data subject has the right to request that Madison Six rectify the personal data it processes about the data subject, provided that it is inaccurate. Under this right, the data subject also has the right to request that Madison Six complete their personal data if it is incomplete.

**RIGHT TO ERASE PERSONAL DATA (RIGHT TO BE FORGOTTEN):** Under this right the data subject has the right to request Madison Six to erase their personal data in cases where this is stipulated in Article 17 of the GDPR. Please note that the right to erasure cannot be exercised if any of the conditions in paragraph 3 of Article 17 of the GDPR are met (e.g. archiving in the public interest, exercising or defending legal claims, etc.).

**RIGHT TO DATA PORTABILITY:** Based on this right, the data subject has the right to transfer personal data provided in a structured, commonly used and machine-readable format, which Madison Six processes about them, to another controller. This right may be exercised in relation to data processed on the basis of the data subject's consent pursuant to Article 6(1)(a) of the GDPR or on the basis of the necessity of processing for the performance of a contract to which the data subject is party pursuant to Article 6(1)(b) of the GDPR.

**RIGHT TO RESTRICT PROCESSING:** You have the right to request that Madison Six restrict the processing of your personal data. The cases in which this right may be exercised are listed in Article 18 of the GDPR.

**RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL DATA:** This right may be exercised in the case of data processed on the basis of Madison Six's legitimate interest pursuant to Article 6(1)(f) of the GDPR.

**RIGHT TO WITHDRAW CONSENT TO THE PROCESSING OF PERSONAL DATA AT ANY TIME:** This right can only be exercised in relation to processing based on prior consent given to Madison Six by the data subject. Withdrawal of consent is effective for the future, i.e. withdrawal of consent does not render processing based on consent prior to withdrawal unlawful.

**RIGHT NOT TO BE SUBJECT TO A DECISION BASED SOLELY ON AUTOMATED PROCESSING, INCLUDING PROFILING:** If we use any automated decision-making or profiling that has legal effects or significantly affects your rights or freedoms (e.g. in connection with the fulfilment of our obligations under the AML Act), we will ensure that: you are informed of the existence of such decision-making; you have the opportunity to object to such decision-making; where required by law, you are provided with a justification and the opportunity to intervene (correct the data, review the decision manually).

Further conditions for exercising this right are set out in Article 22 of the GDPR.

**RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY:** The data subject has the right to lodge a complaint with the competent data protection authority regarding the processing of personal data if they feel that their data is being processed in a manner inconsistent with the GDPR or if they feel that their rights are not being respected.

The contact details of the data protection authorities of all EU Member States are available at: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

In Slovakia, this authority is:

Office for Personal Data Protection of the Slovak Republic Park

One Building

Námestie 1.mája 18

811 06 Bratislava

Slovak Republic

+ 421 2 32 31 32 49

[statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)

- 9.2 You can exercise all of the above rights (except for the right to lodge a complaint, which must be exercised by contacting the competent data protection authority directly) by sending us a request. In this regard, please contact us by email at [dataprotection@madisonsix.sk](mailto:dataprotection@madisonsix.sk).

10 FINAL PROVISIONS

- 10.1 If you have any questions regarding this Data Protection Policy, you can contact us at [dataprotection@madisonsix.sk](mailto:dataprotection@madisonsix.sk) or [info@madisonsix.sk](mailto:info@madisonsix.sk).
- 10.2 We regularly review and update this document. The current version of the document published on the website is always valid.
- 10.3 This Data Protection Policy may be published in different languages. In the event of any discrepancies, the Slovak version shall always prevail.

In Bratislava, Slovak Republic, on 5

January 2026