



Privacy Policy

1. General

Freitx Network LLC ("us", "we", or "our") operates the <https://www.freitx.network> website (hereinafter referred to as the "Service"). This Privacy Policy aims to tell you how we will use any personal data we collect or you provide to us. Please read it carefully before you proceed.

Your privacy is very important to us, and this Privacy Policy sets out how we will process your data and what rights you have in respect of your data. Under data protection legislation (such as the Regulation (EU) 2016/679 (better known as GDPR)) Freitx Network LLC is the data controller in respect of your data and this capacity we will securely store and process personal data which you have provided to us.

This page informs you of our policies about the collection, use, 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 and use of information by following this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same purposes as in our Terms and Conditions, available from <https://www.freitx.network>

If you have any questions about this Privacy Policy or questions, your rights in respect of your personal data, please contact us at hello@freitx.network subject referencing 'Privacy Policy'.

2. Third party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

3. How we collect personal data

We collect personal data about you in the following ways:

- when you register for an account or to receive emails from us
- when you order products or services from us
- when you submit a query or request to us
- when you respond to a survey that we run or fill in forms on one of our websites
- by tracking your use of our websites and mobile applications

- from public sources
- from an examination of public and private blockchains
- from third parties who are entitled to disclose that information to us
- when you apply for a job with us

In some cases, we may be required by law to collect certain types of personal data about you.

Where we collect personal data from you, we will generally do so ourselves. However, in some cases, we may collect personal data from a third party, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

4. What Types Data Do We Collect?

We may collect personal data from you when entering our website. This is to allow you to access the full extent of our services. Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous).

The list below exemplifies what data we may collect. The list is not exhaustive:

- Given name
- Family name
- Address
- Date of birth
- Telephone number
- Image of passport
- Selfie
- Image of recent utility bill displaying address

Any other identity documents or due diligence related documentation that we may request

Other types of personal data we may collect include: Cryptographic hashes of personal data listed above

Digital identifying information sent by your mobile, computer or access device including but not limited to IP address and web log information

Verification reports issued by our partners at your request.

We may require you to provide additional information to verify your identity, address or any other information in your account, such as your date of birth, a copy of ID, citizenship, country of residence, and other information.

Without this information, we may not be able to provide you with our products or services (or with all of the features and functionality offered by our products or services) or to respond to queries or requests that you submit to us.

5. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the

contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

6. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We use your data in accordance with local laws and regulations.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation including anti-money laundering requirements
To process and deliver your order including: (a) Manage payments, fees, and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

(b) Collect and recover money owed to us	(e) Marketing and Communications	
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>

<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and</p>

relationships and experiences		relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

7. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly in marketing and advertising.

8. Promotional Offers From Us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

9. Cookies

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

10. Data Security and Retention

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

By law, we have to keep basic information about our customers least for five years after they cease being customers for tax purposes.

11. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to the processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us by emailing hello@freitx.network

12. No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

13. What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

14. Time Limit To Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

15. Changes To Our Privacy Policy

We keep our privacy policy under regular review. Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this policy. This version was last updated on 25th October 2018.

16. Contact Us

If you have any questions about this Privacy Policy or questions, your rights in respect of your personal data, please contact us at hello@freitx.network subject referencing 'Privacy Policy'