

PRIVACY POLICY OF THE SMARTZ PLATFORM

WHAT PERSONAL INFORMATION WE COLLECT FROM YOU AND HOW?

We are collecting your personal information when you register or subscribe for one of our Services, place an order, buy a token, use our online services, interact with us, such as via social media, click on an advert that we put on our or someone else's website, use our services, ask for information or assistance, give us a testimonial or other feedback, comment on any blogs or articles featured in our services, attend an event that we run or sponsor, enter competitions or special promotions, sign up for our special offers or other updates, participate in research panels or fill in surveys.

When you are registering, subscribing or using our services, you consent to the use of your personal data in line with this policy. We may also receive information about you from SMARTZ PLATFORM and from third parties, with whom we have a business relationship.

Our services shall mean: giving access to customers on the SMARTZ PLATFORM to connect smart contracts and applications that together, should create an ecosystem to empower the following blockchain advancements: (i) Easily develop, deploy and / or acquire ready to use smart contracts; (ii) Make payments using the SMARTZ (SMR) token or other accepted crypto-currencies either on a p2p, b2c or b2b basis; (iii) Integrate with new applications in order to deploy a range of smart contracts in the real world; (iv) Manage and monitor deployed smart contracts as well as blockchains, if applicable; (v) SMARTZ PLATFORM team will create bespoke smart contracts for its clients and (vi) SMARTZ PLATFORM will customize solutions for its clients leveraging the SMARTZ PLATFORM.

The information we collect and hold about you may include your name, email address, phone and mobile phone numbers, home address, IP address, search criteria, purchase history, purchase preferences, responses to research panels and surveys, type of browser that you use, the number of times when you access the SMARTZ PLATFORM and for how much time, the type of services that you use on the SMARTZ PLATFORM, your referring URL (the site you come from to reach our website), cell IDs (these are the unique identifiers of the telecommunications towers being used by your mobile phone when you use our locations-based services on your mobile phone or tablet) and other location information (for example, GPS measurements), photographs and other content you share with us when you use our services, date of birth, password details, answers to security questions and any other information you may give us.

[We may record or monitor calls that you receive from us or make to us. We do this for security and training purposes, and to improve the quality of the services we provide to you.]

WHAT ABOUT COOKIES? WHAT ARE COOKIES?

We collect information about your use of our online services using cookies. Cookies are very small files that are sent by us to your computer or other device which we can access when you visit our site in future. Cookies help us remember who you are and other information about your visits. They can help display the information on a website in a way that suits your interests. Most

major websites use cookies. For more information about how we use cookies, you are advised to read our cookie policy available on the website.

HOW THIS INFORMATION MAY BE USED

Whenever you give us your personal information we will use it in accordance with applicable privacy laws of your jurisdiction and for the purposes set out in this policy, on the data entry forms you complete, in any relevant terms and conditions and on pages or emails which link to the data entry forms.

When you use our services:

If you use any of our services, register for or attend one of our events, set up, look at or change your account details or contact our customer care team, we will record your personal details that you transmit to us. Your information will be used in the first place to provide the products, services or information you have asked for and to provide you with a personalized user experience. We store the information that you are providing to us and may use it for the following purposes, including, but not limited to: (i) accounting, billing, reporting and audit; (ii) credit checking or screening; (iii) authentication and identity checks; (iv) credit, debit or other payment card verification and screening; (v) debt collection; (vi) safety, security, training, administrative and legal purposes; (vii) data matching and dedupe, statistical and market analysis, and marketing information; (viii) advertising and marketing for us; (ix) developing, testing and maintaining systems; (x) studies, research and development; (xi) customer surveys; (xii) customer care and to help us in any future dealings with you, for example by identifying your requirements and preferences; (xiii) where required by law or in connection with legal proceeding or disputes; and (ix) any other uses set out in the terms and conditions for use of our services (x) for enforcement of know-your-client (KYC) obligations, customer identification or prevention of money laundering. For these purposes we may disclose your information to one or more of the other organisations listed in the section called "who we will share your personal information with" or to authorities that may request such information from us.

Tracking how our online services are used:

We collect and use third parties to collect and share with us, information from lots of visitors to our online services and analyse it to build up a picture of how people use our websites. This helps us improve the services we offer. We may also give anonymous statistics about visitors to other, reputable organisations, but the information we provide will not include details that would allow these organisations to identify you. For more information on our use of cookies, please read our cookie policy.

Customization of our online services and advert targeting:

We may use the information you give us about yourself and the information we collect via cookies when you use our online services to build up a picture of your interests. We may then use this information to try to make sure that when we send you marketing communications and

when you visit our websites or use our online services, you do not miss offers and information that might interest you. This information may also be used by our third-party advertising agencies and networks, to advertise our own or third-party products and services to you when you visit third party websites and online services. This is called advert targeting or interest-based advertising. For more information on how to reject targeted advertising or interest-based advertising cookies please read our cookie policy.

Testimonials:

If you give us feedback, we may use it to improve our services and we may publish it online or offline to promote our business and our services. You will be made aware of and we will ask for your consent before we publish it.

Comments and reviews submitted to our online services:

If you wish to submit a comment or feedback on a blog or article featured on our services, we may (but are not obliged to) publish your comment online or offline to promote our business and our services. We will collect your name or username which will be displayed next to your comment and e-mail address, which will not be published in the online environment, but which we may use to contact you in relation to your comment.

Mobile services:

When you request our mobile services, we may keep your mobile phone number, the make and model of your phone, the operating system used by your phone and details of your network operator, and we will link a unique identifier to your mobile phone number. We will store your device language, app language, country. We need this information in order to provide the features and services enabled through our mobile services and to administer our mobile service. We may also use it for SMS or voice marketing and market research, but subject to your prior consent.

Social networks:

If you follow us or interact with us on any of our pages on third party social media platforms, such as Instagram, Facebook, Twitter, Pinterest and Google+, information you provide will be subject to the third party's privacy policy, as well as this privacy policy.

Direct marketing:

For information on how we may market to you, please read the section called "marketing opt-in and opt-out provisions".

Customer surveys:

From time to time, we may ask you for your opinion on our services and the products you have purchased through our services. When we do research or surveys, we may use cookies and may combine the information collected by those cookies with your answers.

WHO WE WILL SHARE YOUR PERSONAL INFORMATION WITH

From time to time, we receive requests for information from government departments, the police and other enforcement agencies. If this happens, and there is a proper legal basis for providing your personal information, we will provide it to the organisation asking for it.

We collate information about site traffic, sales, wish lists, and other commercial information which we may pass onto third parties, but this information does not include any details which can identify you personally.

WHERE WE PROCESS YOUR PERSONAL INFORMATION

The personal data we collect or generate (process) in the context of our Sites and Apps will be stored in cloud. When we use your information as described in this policy, this may involve sending your information outside the European Economic Area (EEA). When we do this, we make sure that appropriate steps are taken to protect your personal information and your rights. By providing us with your personal information, you agree that we may transfer, store and process your information outside the EEA. Governments in certain countries such as the USA have broad powers to access data for security, crime prevention and detection and law enforcement purposes.

The information that is required to be given by you is retained/stored for unlimited time. When exporting the data and information that you provide to us, we use a custom internally built back-end application as export solution. When doing so, you are entitled to (i) obtain a copy of the solution, (ii) the source of the data (if not the data subject him/ herself) and (iii) whether obtained from a public source, and (iv) more information on wholly automated processing.

You are entitled at any time to withdraw your consent on the storage and processing of your personal data and to lodge a complaint to the Supervisory Authority of your home country. If and once the consent to the storage and processing of your personal data is given, this may impact on the provision of the services, leading to likewise suspension or interruption of the services that we provide to you, as most details that we store and process are required for the service to be provided to you or for legitimate bookkeeping or auditing purposes or for other mandatory requirements which would under relevant jurisdictions oblige us to keep such data for further governmental or state inquiries, for certain period of time.

DATA SUBJECT RIGHTS. YOUR RIGHTS

You are at any time entitled to:

- have personal data transmitted to you or another controller in a commonly used machine-readable format (data portability);
- require us to erase personal data in certain circumstances and where the data has been made public to take reasonable steps to inform us that you have requested its erasure of any links to, copies or replication of it (right to be forgotten);

- more information about our automated processing capabilities (export solution, storage limits) through a subject access request and we are obliged to provide this information in a commonly used electronic form;
- require data to be marked as restricted whilst complaints are resolved;
- be notified without undue delay in the case of breach in the protection of the personal data.

Should we receive such notice on the exercise of your rights, we must be take action within 1 month of, or if complex within 3 months of having received your request.

MARKETING OPT-IN AND OPT-OUT PROVISION

We offer you the chance to receive news and fashion updates which, depending on your preferences, we will discuss with you by phone or live chat or send to you via email, SMS and/or direct mail. These include alerts for new products, features, enhancements, special offers, upgrade opportunities, contests, events of interest, and one-off marketing promotions. You can opt-out of receiving these updates, if you wish.

HOW YOU CAN ACCESS AND UPDATE YOUR PERSONAL INFORMATION

You have the right to see information we hold about you, with some exceptions which are described in the privacy laws. If you would like a copy of your personal information, please contact our data protection officer at mailbox@smartz.io

SAFEGUARDING YOUR PERSONAL INFORMATION

We will take reasonable care to maintain appropriate safeguards to ensure the security, integrity and privacy of the information you have provided to us. We have put in place technology and security policies which are designed to protect the personal information we hold about you. We also follow the security procedures that applicable privacy laws require. This cover storing, using and releasing any information you have provided and, as well as measures designed to prevent unauthorised access or use. When you place an order or access your account information, we use a Secure Socket Layer (SSL) encryption which encrypts your information before it is sent to us to protect it from unauthorised use.

WHY WE LINK TO OTHER WEBSITES

Our online services contain hyperlinks to websites that are owned and operated by other organisations. These websites have their own privacy and cookie policies, and we urge you to read them. They control how your personal information is used when you give it to these other organisations or they collect it with cookies. We do not approve any other websites and we are not responsible for any information, material, products or services that are on or accessible through those websites or for the privacy practices of websites run by other organisations. If you use these other websites you do so at your own risk.

HOW WE CAN MAKE CHANGES TO THIS POLICY

We may update this privacy policy from time to time so you may want to check it each time you give us personal information or use our websites. When we update this policy, the changes will not be retroactive. We state that if you do not like changes we make, you can terminate this policy and must stop using the Services.

WHERE AND HOW TO ASK QUESTIONS OR CONTACT US ABOUT THIS POLICY

If you require more information, please contact our data protection officer at mailbox@smartz.io

Cookies Policy of the SMARTZ PLATFORM

Last updated: 29.03.2018

By using the Service, you consent to the use of cookies.

Our Cookies Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

What are cookies

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.

Cookies can be "persistent" or "session" cookies.

How are we using cookies?

When you use and access the Service, we may place a number of cookies files in your web browser.

We use cookies for the following purposes: to enable certain functions of the Service, to provide analytics, to store your preferences, to enable advertisements delivery, including behavioural advertising.

We use both session and persistent cookies on the Service and we use different types of cookies to run the Service:

- Essential cookies. We may use essential cookies to authenticate users and prevent fraudulent use of user accounts.

How long will cookies stay on your device?

The length of time a cookie will stay on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted.

Third-party cookies

In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of the Service, deliver advertisements on and through the Service, and so on.

What are your choices regarding cookies

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

How to control and delete cookies

For an up-to-date summary of every third-party accessing your web browser (through our website), we recommend installing a web browser plugin built for this purpose. You can also choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings on each browser and device that you use. Each browser is different, so you are advised to check at your browser Help menu to learn how to modify your cookies. If you turn cookies off, you may not have access to many features that make our website more efficient and some of our services will not function properly.