



blockdraw

Privacy Policy

V1.0

Business class security and Integrity combined with the
verifiability and trustless capability of the blockchain.



Blockdraw Token Trust, Blockdraw Issuer Limited and Blockdraw Capital Limited (collectively "Blockdraw") are committed to being responsible custodians of the information you provide to us and the information we collect in the course of operating our decentralized casino exchange platform.

This Privacy Policy describes how Blockdraw may collect, use, and share information, particularly in association with the operation of our main website www.blockdraw.it and our mobile applications that link to this Privacy Policy, referred to as our "Online Services" throughout this policy.

This Privacy Policy describes:

- The types of information we may collect from you when you use our Online Services;
- How we use the information we collect;
- How we may share the information we collect;
- The measures we take to keep the information we hold secure;
- Third-party services and content;
- Your choices and rights;
- How to contact us;
- How to make a complaint;
- Changes to this Privacy Policy

THE TYPES OF INFORMATION WE COLLECT

We collect your personal information when you provide it to us. "Personal information" is any information that can be used to identify you or that we can link to you as an individual. We may automatically collect certain information when you use, access, or interact with our Online Services. We may also collect information from other sources, such as social media platforms that may share information about how you interact with our social media content.

INFORMATION YOU PROVIDE TO US

Generally, you can use our Online Services without providing us with any personal information.

However, purchasers of DRAW tokens are required to answer questions and submit documents and personal information as described in our Customer Due Diligence “CDD” (aka “know-your-customer” or “KYC”) [Policy](#), a subset of our AML/CFT Policy.

As part of the token sale process for DRAW tokens, we collect the following information from you:

- First and Last Name;
- Email address;
- Mobile phone number;
- Nationality;
- Country of Residence;
- A copy of a government issued photo ID. click [\[HERE\]](#) for a list of documents we accept per country.
- A copy of a document proving your address (such as a utility bill or bank statement);
- Your Ethereum Wallet Address for our Whitelist and any related transaction details recorded by the public Ethereum blockchain;
- Browser or Device Information: IP address, type of device, browser type, plug-ins, add-ons.

We may also collect information that you voluntarily provide to us, including when you communicate with us via email or other channels; when you register an account with us and when you respond to our communications or requests for information. The information you provide may include your name, contact information, title, and other personal information about you. Some of our Online Services may require that you enter a password or other information in order to access certain features, and we collect such credentials when you enter them.

INFORMATION WE MAY COLLECT AUTOMATICALLY THROUGH COOKIES AND SIMILAR TECHNOLOGIES

We use browser cookies and similar technologies (collectively, “Cookies”) to collect and store certain information when you use, access, or interact with our Online Services. We may, for example, collect information about the type of device you use to access the Online Services, the operating system and version, your IP address, your general geographic location as indicated by your IP address, your browser type, and features you access on the Online Services, whether and how you interact with content available on the Online Services, and the search terms you enter on the Online Services. For information about how we use Cookies and the choices you may have, please see our Cookies Policy.

INFORMATION WE MAY COLLECT FROM THIRD PARTY SOURCES

We may receive information about you from other sources, including third parties that help us: update, expand, and analyse our records; or prevent or detect fraud. Please note that the information we may receive is governed by the privacy settings, policies, and/or procedures of the transferor.

HOW WE USE THE INFORMATION WE COLLECT

We may use the information we collect:

- To respond to your enquiries;
- To conduct know-your-client and anti-money laundering and other sanctions checks;
- To provide you with our products and services and other services that you request including, as applicable, administering the sale of DRAW tokens;
- To operate and improve our Online Services;
- With your separate consent, to send you marketing communications, and other information or materials that may be of interest you or which you have expressed an interest in receiving;
- To maintain our list of contacts;

- To understand how people use our Online Services, including by generating and analysing statistics;
- For Blockdraw's business purposes, including data analysis; invoicing, detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement;
- To assess the effectiveness of our events, promotional campaigns and publications;
- As we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protect your, our, or others' rights; and
- We may aggregate personal and other data captured through our Online Services so that the data is no longer capable of identifying an individual. Aggregated data may cover patterns of usage relating to our Online Services and Blockdraw reserves the right to use this aggregated information for the purposes of improving and enhancing our Online Services, generating and commercialising insights and otherwise for the purposes of our business.

HOW WE MAY SHARE THE INFORMATION WE COLLECT

We may share the personal information we collect with other entities within the Blockdraw network.

We do not sell, rent, or otherwise share information that reasonably identifies you or your organisation with unaffiliated entities for their independent use except as expressly described in this Privacy Policy or with your prior permission. We may share information that does not reasonably identify you or your organisation as permitted by applicable law.

We may also disclose information we collect:

- To third-party service providers that perform services on our behalf, such as marketing companies, web-hosting companies, analytics providers and information technology providers.
- We may disclose identity information provided by purchasers of DRAW tokens with third party service providers to conduct CDD and other regulatory and sanctions checks in

accordance with the CDD Policy on our behalf. In these circumstances contractual and other technical and security safeguards will be put in place with the third-party provider.

- To law enforcement, other government authorities, or third parties (within or outside the jurisdiction in which you reside) as may be permitted or required by the laws of any jurisdiction that may apply to us; as provided for under contract; or as we deem reasonably necessary to provide legal services. In these circumstances, we take reasonable efforts to notify you before we disclose information that may reasonably identify you or your organisation, unless prior notice is prohibited by applicable law or is not possible or reasonable in the circumstances.
- To service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets.
- With financial institutions or service providers to BlockDraw who may request such information in connection with providing services, including banking services, and only where we enter into an agreement with such institutions to limit their use and handling of the data in a reasonably appropriate fashion.
- Employees of BlockDraw may be given access to any information which we collect via our Online Services, but their use shall be limited to the performance of their duties and in line with the reason for processing. Our employees are required to keep that information confidential and are not permitted to use it for any purposes other than to enable you to use the Online Services or to deal with requests which you submit to us.

GROUNDS FOR USING YOUR PERSONAL INFORMATION

We rely on the following legal grounds to process your personal information, namely:

- Performance of a contract – We may need to collect and use your personal information to enter into a contract with you or to perform a contract that you have with us. For example, when you provide personal information to us to purchase DRAW tokens.

- **Consent.** To withdraw your consent to such use, you can contact us via our Contact Us page, or you may be able to disable the sharing of location information in your browser or mobile application settings. Where required by applicable laws, we will rely on your consent for direct marketing and to collect information from your device or computer.
- **Legitimate interests** – We may use your personal information for our legitimate interests to improve our products and services and the content on our Online Services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable laws, we may use technical information as described in this Privacy Policy and use personal information for our marketing purposes.

THIRD-PARTY SERVICES AND CONTENT

Our Online Services may include integrated content or links to content provided by third parties (such as video materials). This Privacy Policy does not address the privacy, security, or other practices of the third parties that provide such content.

We engage third parties that support the operation of our Online Services, such as analytics providers. These third parties may use technologies to track your online activities over time and across different websites and online platforms. Please see our Cookies Policy for more information.

PROTECTION AND STORAGE OF THE INFORMATION WE COLLECT

We deploy administrative, technical, and physical safeguards designed to comply with applicable legal requirements and safeguard the information that we collect. This includes, when required or appropriate and feasible, obtaining written assurances from third parties that may access your data that they will protect the data with safeguards designed to provide a level of protection equivalent to that adopted by Blockdraw.

However, no information system can be 100% secure. So, we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the Internet and wireless networks.

The Online Services are controlled and operated by BlockDraw from Kiev and L'viv, Ukraine. We may store the information we collect in on our servers (both cloud based or in servers located in secure data centres located within the European Union) or in other countries where we or our service providers have facilities. Therefore, we may transfer information to countries outside of your country of residence which may have data protection laws and regulations that differ from those in your country.

We retain the information we collect for no longer than is reasonably necessary to fulfil the purposes for which we collect the information and to comply with our legal obligations.

YOUR CHOICES AND RIGHTS

To withdraw your consent to the use of your information as described in this Privacy Policy you can contact us via our Contact Us page. Please note that in some circumstances this may mean that we can no longer provide our services to you. If you no longer wish to receive marketing communications from us, you can also let us know via our Contact Us page. The electronic marketing communications we send you also contain opt-out mechanisms that allow you to opt-out from receiving those communications, update your contact information or change your preferences at any time. We will honour your choice and refrain from sending you such announcements. You may also opt back in to receive those communications at any time.

Subject to local law, you may have certain rights regarding information that we have collected and that is related to you. We encourage you to contact us to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate or out of date. You can also ask us to see what personal information we hold about you and to erase your personal information if it is no longer required. You may also tell us if you object to our use of your personal information.

Your ability to exercise these rights will depend on a number of factors and in some instances, we will not be able to comply with your request, for example because we have legitimate grounds for not doing so or where the right doesn't apply to the particular information we hold on you.

If you would like to discuss or exercise the rights you may have, you can contact us via our Contact Us page.

HOW TO CONTACT US

We welcome your enquiries and comments.

If you would like to contact us please send us an email at support@BlockDraw.it or via our Contact Us page.

COMPLAINTS

We are committed to working with you to obtain a fair resolution of any complaint or concern about your privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to complain to the data protection authority/regulator, as applicable, in your jurisdiction.

DATA SUBJECTS UNDER EIGHTEEN

Blockdraw's business is not directed at anybody under the age of eighteen, and Blockdraw will never knowingly collect personal information from individuals under the age of eighteen.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time and we encourage you to periodically review this page. If we make any material changes in the way we collect, use, and/or share the personal information that you have provided, we will notify you by posting notice of the changes in a clear and conspicuous manner on the Blockdraw website www.blockdraw.it

COOKIES POLICY

Blockdraw uses cookies and tracking technologies on our Online Services to enable us to analyse use of those services and to improve your experience when using those services. This policy describes how Blockdraw uses cookies and tracking technologies and provides information about how other entities may use such technologies in association with the operation of our Online Services.

COOKIES AND TRACKING TECHNOLOGIES

Web Browser Cookies

A web browser cookie is a small text file that is sent by a website to your computer or mobile device where it is stored by your web browser. Web browser cookies may store information such as your IP address or other identifier, your browser type, and information about the content you view and interact with on the Online Services. By storing such information, web browser cookies can remember your preferences and settings for online services and analyse how you use online services.

Tracking Technologies: Web Beacons / Gifs, Pixels, Page Tags, Script

Emails and mobile apps may contain a small transparent image files or lines of code to record how you interact with them. This information is used to help website and app publishers better analyse and improve their services.

HOW WE USE COOKIES AND TRACKING TECHNOLOGIES

We use cookies and tracking technologies to remember your preferences and settings; to remember information that you may enter online; to keep you logged in to portals that we may offer; to generate aggregate statistics about how people use our Online Services; to help you share content with others; and to improve your experience of the Online Services.

YOUR CHOICES: MANAGING COOKIES AND OPTING OUT

You can choose how web browser cookies are handled by your device via your browser settings, including refusing or deleting all cookies. Some devices allow you to control this via your device settings. If you choose not to receive cookies at any time, the website may not function properly and certain services will not be provided. Each browser and device is different, so check the settings menu of the browser or device you are using to learn how to change your advertising settings and cookie preferences.

REVISION HISTORY

Revision	Author	Date	Status and Description
1.0	Administrator	Apr 16, 2018	Privacy Policy