



## TRAVELTOKENS SALE PRIVACY POLICY

Last updated: 23.11.2017

### STATUS AND ACCEPTANCE OF PRIVACY POLICY

1. This Privacy Policy (hereinafter referred to as the “Policy”) sets forth the general rules of Participant’s Personal Data collection, processing, distribution, use and keeping by the Travelchain Pte. Ltd. (hereinafter the “Travelchain”).
2. Throughout this Policy, Travelchain use the term “Personal Data” to describe information that can be associated with a specific person (hereinafter the Participant) and can be used to identify that person (including the information about the Participant’s activities, such as information about Your use of the Website, when directly linked to personally identifiable information, including automatically collected). Travelchain does not consider Personal Data to include information that has been anonymized so that it does not identify a specific Participant.
3. This Policy is inalienable part of Travelchain General Terms & Conditions of TravelTokens Sale. In terms not regulated by this Policy, the Travelchain General Terms & Conditions of TravelTokens Sale shall apply to the relationships that arise hereunder.
4. The definitions set forth herein and mentioned with capital letter shall have the meaning as described in Travelchain General Terms & Conditions of TravelTokens Sale.
5. It is understood and presumed that by the fact of the Website use and purchase of TravelTokens or by providing Travelchain the Personal Data directly on its request, the Participant has fully read, understood and accepted this Policy. If any Participant does not agree with this Policy in general or any part of it, such Participant should withhold from using the Website and/or purchase of TravelTokens.



## COLLECTION, PROCESSING AND USE OF PERSONAL DATA

6. The purpose of personal data collection, storage and processing within the Travelchain project shall only be the identification of the Travelchain Token purchaser – Participant of the TravelTokens Sale.

7. Travelchain collect Personal Data from running the Website and use Personal Data, provided to Travelchain by You. When the Participant visit the Website or use our products, Travelchain collect the Personal Data sent to Travelchain by Your computer, mobile phone, or other access device. This Personal Data includes:

- (1) Your IP address;
- (2) Device information including, but not limited to, identifier, name, and type, operating system;
- (3) Mobile network information;
- (4) Standard web log information, such as Your browser type, and the pages You accessed on Travelchain Website.

When the Participant use a location-enabled device with Travelchain Website and products, Travelchain may collect geographical location data or use various means to determine the location, such as sensor data from the Participant's device that may, for instance, provide data on nearby cell towers and Wi-Fi access spots. However, Travelchain will not release Your personally identifying information of such kind to any third party without Your consent, except as set forth herein.

8. If the Participant want to purchase TravelTokens, Travelchain collect and store the following types of Personal Data about You:

- (1) Your name, Date of birth;
- (2) Your address, country of residence;
- (3) Your email and contact phone.

9. In certain cases (when additional verification by bank or compliance authority is needed according to governmental rules, anti-money laundering (AML) or “know-your-customer” (KYC) policies) Travelchain may require You to provide additional information, and namely:

- (1) Passport or driver license details;
- (2) Numbers that You may use or have registered with Your local tax authority;
- (3) Utility bills;
- (4) Photographs of You;
- (5) Confirmation of proceeds sources;
- (6) Sworn statements.

The abovementioned information and details shall be provided only upon special personal request to the Participant and specified in respective email. Travelchain also reserve the right to request the Participant for remote identification procedure.

10. Travelchain reserve Travelchain right to request basic Personal Data, described in clause 9, prior to purchase of TravelTokens and/or use of any services, available through the Website. Travelchain may refuse the Participant access to the Website in case if Travelchain have grounded doubts as to validity, authenticity and genuineness of the Personal Data, provided by the Participant.

11. If the Participant does not provide Travelchain with the Personal Data as specified in clauses 8, 9. hereof, the Participant shall not be able to use the full functionality of the Website and purchase TravelTokens and/or use the Travelchain platform. At that, Travelchain shall not bear any liability for such possible incomplete use.

12. When the Participant access the Website or use Travelchain products or services Travelchain (or Google Analytics or similar service provider on our behalf) may place small data files called cookies on the Participant’s computer or other device. Travelchain use these technologies to recognize You as our Token Sale Participant, customize Travelchain Website and advertising, measure promotional effectiveness and collect information about Your computer (as described in clause 7. hereof) or other access device to mitigate risk, help

prevent fraud, and promote trust and safety. You may control the use of cookies within Your internet browsers' settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of our Website and services may be impaired.

13. Travelchain collect from the Participants only the Personal Data that Travelchain need for their proper use of the Website or for purchase of TravelTokens. In particular, Travelchain use the Participant's Personal Data to:

- (1) Administer Travelchain Website and provide services;
- (2) Develop new products and services;
- (3) Personalize Travelchain Website for You;
- (4) Send You technical notices and support and administrative messages;
- (5) Communicate with You about products, services, promotions, events and other news and information Travelchain think will be of interest to You;
- (6) Monitor and analyze trends, usage and activities in connection with Travelchain Website;
- (7) Provide third parties with statistical information about Travelchain Participants (but those third parties will not be able to identify any individual Participant from that information);
- (8) Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Travelchain and others;
- (9) Link or combine Personal Data Travelchain collect from or about You; and
- (10) Verify compliance with the terms and conditions governing the use of Travelchain Website (including monitoring private messages sent through the Website private messaging service).

14. The Travelchain is the only data controller and processor, except for the cases when there is an objective Travelchain need to control/process or store Personal Data at Travelchain's



counterparties or agents. Should such counterparty or agent be engaged by the Travelchain, Travelchain shall notify You in advance.

15. You may access, review and edit Your Personal Data at any time by communicating Travelchain in writing.

16. The Participant has the right to require Travelchain to delete Participant's Personal Data provided by the Participant to Travelchain or revoke his (or her) consent for collection, processing and storage of his (or her) personal data by Travelchain at any time. If You decide to do this, You should send the respective notification to the Travelchain. Travelchain shall delete Your respective Personal Data from any sources within 24 hours from the moment Travelchain receive such request from You. At that, the Travelchain reserves its right to suspend provision of any services to You referring to Travelchain project and/or delete Your Account on the Website without prior notice, not providing any compensations to You.

17. Travelchain will not publish any Personal Data related to Your purchase of TravelTokens without Your prior written consent.

## **PERSONAL DATA PROTECTION AND SHARING**

18. Travelchain will do any and all efforts and actions prescribed by Applicable Law to store any of Your personal data in secrecy.

19. Travelchain store and process Your Personal Data on Travelchain servers in various jurisdictions, where our facilities and/or Travelchain service providers are located. By submitting Your Personal Data, You agree to this transfer, storing, or processing. Travelchain will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Policy. Travelchain protect Your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards Travelchain use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. Travelchain also



authorize access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent than in Your country. From time to time, the Personal Data may be also stored in other locations, and in such cases, Travelchain will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

20. Travelchain is sometimes required to compare the Personal Data You provide to third party databases in order to verify its accuracy and confirm Your identity. This allows Travelchain to comply with relevant anti-money laundering (AML) regulations and “know your customer” (KYC) regulations.

21. Travelchain will not share Your Personal Data with any third parties other than Travelchain respective identity verification partners. Travelchain reserve our right to share Your Personal Data with:

- (1) Travelchain banking and brokerage partners;
- (2) Companies that Travelchain plan to merge with or be acquired by (should such a combination occur, Travelchain will notify You and will require that the newly combined entity follow these terms with respect to Your Personal Data);
- (3) 3rd party identification service providers for fraud prevention purposes;
- (4) Law enforcement, government officials, or other third parties when Travelchain are compelled to do so by a subpoena, court order, or similar legal procedure; or Travelchain believe in good faith that the disclosure of Personal Data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of Travelchain policies;
- (5) Travelchain Personal Data processing counterparties or agents, hired by or cooperating with us, who's services are required by us from the practical point of view;
- (6) Other third parties only with Your prior consent or direction to do so.

22. Travelchain will not provide Your Personal Data to any other Website users or third parties other than described in clause 21 herein without Your consent or direction.

23. Travelchain will not sell or rent Your Personal Data to third parties.

24. Travelchain may combine Your Personal Data with information Travelchain collect from other companies and use it to improve and personalize the Website and our products, as well as our content and advertising.

25. Travelchain may use Your name and email address to provide You with information about products or services that may be of interest to You, but Travelchain will not use Your Personal Data without complying with applicable laws and, where appropriate, obtaining your consent.

26. Travelchain services may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If You follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that Travelchain do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location data. Please check these policies before You submit any personal data to these websites or use these services.

## **RETAIN INFORMATION**

27. In accordance with Applicable Law and as needed to provide services to Travelchain Participants, Travelchain may hold Your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. Travelchain may retain Your Personal Data for as long as You possess TravelTokens and/or use the Website. Moreover, Your Personal Data may be hold beyond the abovementioned period till it is indispensable for Travelchain to have relevant information to respond to any issues that may arise later.

## **SECURITY**



28. Travelchain use relevant electronic and procedural safeguards to protect the privacy of the information the Participant provide to Travelchain from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Please note that Travelchain are not liable for the security of any data Participants are transmitting over the Internet, or third party content.

#### **CHANGE/UPDATE/DELETE PERSONAL DATA**

29. You have a right to demand Travelchain to provide You access to Your Personal Data and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting Travelchain. Nevertheless, this request must comply with Travelchain General Terms & Conditions of TravelTokens Sale and Travelchain legal obligations.

#### **AMENDMENTS**

30. Travelchain reserves the right to modify or amend this Policy at its own discretion. The changes can be viewed in the “Last Updated” field above. Your continued usage of the Website shall mean Your acceptance of those amendments.