

FULEEX MEMBER PRIVACY POLICY

Updated as of 28 July 2018

To ensure that you have full confidence in our handling of personal data, you are advised to read and understand the terms of this Privacy Policy in detail. In particular, upon your log into our Website, regardless of whether you register with this Website, you shall be deemed to accept, agree, undertake and confirm the below:

1. PARTIES

1.1 Frontpaige Limited, registered in the BVI is (hereinafter referred to as 'the Company') is a company that has ownership and operates **FULEEX** the Website **fuleex.exchange and fuleex.io** (hereinafter referred to as 'Website' or 'Electronic Service', "platform", "system"), which is a platform dedicated to the transaction of digital assets and the provision of related services (hereinafter referred to as 'the Service'). For the convenience of wording in this Agreement, the Company and the Website / Electronic Service are referred to collectively as 'we' or other applicable forms of first person pronouns in this Agreement.

1.2 All natural person(s) or other subjects who log onto this Website and register within agree to become "member(s)" of this Website. For the convenience of wording in this Agreement, the users are referred to as 'you' or 'members' any other applicable forms of the second-person pronouns. And upon logging onto website, the person agrees to the terms and conditions set out in this agreement / and henceforth of the website and its affiliated websites.

1.3 For the convenience of wording in this Agreement, you and we are collectively referred to as both "parties", and individually as "one party" .

1.4 This Privacy Policy explains how **fuleex.exchange and fuleex.io** ("platform") collects, uses, shares, and protects user information obtained through the website. The terms "we," "us," and "our" refer to Frontpaige Limited and its affiliates and subsidiaries or strategic partners. When we ask for certain 'member' personal information it is because we are required by law to collect this information or it is relevant for specified purposes. Any non-required information you provide to us is done so voluntarily and as and when required.

You can decide whether to provide us with the non-required information; you may not be able to access or utilize all of our Services if you choose not to.

2. YOUR CONSENT

To shall deem to accept, agree, undertake and confirm that:

2.1 You, on the basis of your own free will and your requisite consent, agree to disclose your personal information to us;

2.2 You will comply with all the terms and limitations of this Privacy Policy;

2.3 You agree that we may collect your information through your log into the Website, your registration with the Website, and/or your using the Services offered by us; you agree to the data practices described in the Privacy policy and to any changes and modifications that we may make to our Privacy Policy in the future;

2.4 You agree that our branches, affiliates, subsidiaries, partners and employees may contact you in connection with the products and services that you may be interested in (unless you have indicated that you do not want to receive such information).

On occasion, **FULEEX** may revise this Privacy Policy to reflect changes in the law or our personal data collection and use practices. If material changes are made to this Privacy Policy, the changes will be announced by posting on the site. We will ask for your consent before using your information for any purpose that is not covered in this Privacy Policy.

3. INFORMATION COLLECTED

Information collected at registration will be used for the following services:

3.1 When you create a **FULEEX** Account, you provide us with personal identity information that includes your personal contact information (Email Address, name, password and trading account password, residence address, mailing address, other certificates and corresponding numbers thereof that are issued by your country or government to certify your identity, as well as all other information that can help us to verify your identity (hereinafter referred to as 'identity information')). An email or phone number made be required for added Authentication or be used for 2FA verification for improved security.

Information collected when authenticating user/member identity. Such information can help us verify whether you are eligible to be registered as a member of the Website.

3.2 To comply with global industry regulatory standards including **Anti-Money Laundering (AML)**, **Know-Your-Customer (KYC)**, and **Counter Terrorist Financing (CTF)**, **FULEEX** requires user accounts to undergo user identity authentication for both Personal & Enterprise-level. This entails collecting formal identification and images (of oneself & identification).

(A) Service Usage Information

Through your use of the platform, you agree to permit us to use cookies to track each of your actions and collect and keep all the information that you leave on this Website, including but not limited to your IP address, location, and other information. This could include monitor and tracking information related to usage such as access date & time, device identification, operating system, browser type and so on. This information may be directly obtained by **FULEEX**, our affiliates or through a third-party / partner service. This service usage data helps our systems to ensure the smooth operations as well as if required by any court order, any applicable law, administrative regulation or any order of any other competent government agency or to aid during criminal investigations if any.

If you visit any links to third-party websites as are listed on exchange.fuleex or fuleex.io Website(s) or any link of any of our third-party partners, you shall agree to and comply with the separate and independent Privacy Policy of such third party website. We will not bear any liability for the contents and activities of such websites or the partners.

(B) Cookies

- i. When you visit our Website, we use cookies to record our performance and check the effect of usage ie online advertising. Cookies are a small amount of data that is sent to your browser and stored on your computer hard drive. Only when you use your computer to access our Website can the cookies be sent to your computer hard drive.
- ii. Cookies are usually used to record the habits and preferences of visitors in browsing the items on our Website. The information collected by cookies is non-registered and collective statistical data and does not involve personal data.
- iii. Cookies, which enable the Website or service provider system to recognize your browser and capture and recall information, cannot be used to obtain data on your hard drive, your email address, or your personal data. Most browsers are designed to accept cookies. You can opt to or set your browser to disable cookies, however if so, it is possible that you may not be able to launch or use some functions of our Website.

(C) Transaction Information

For all personal and enterprise user accounts, we will collect transaction information including banking details, deposit snapshots, account balances, trade history, withdrawals, order activity and distribution history. This transaction data is monitored and from time to

time is reviewed to avoid suspicious trading activity or for user fraud protection, and at legal case resolution (if required).

4. WHY DO WE COLLECT THE INFORMATION

To maintain our services

We use the information collected to deliver our services and verify user identity. We use the IP address and unique identifiers stored in your device's cookies to help us authenticate your identity and validate our service operations. Given our legal obligations and system requirements, we cannot provide you, our member with services without data like identification, contact information and transaction-related information.

To protect our users

We use the information collected to protect our platform, users' accounts and archives. We use IP addresses and cookie data to protect against automated abuse such as spam, phishing and Distributed Denial of Service (DDoS) attacks. We analyse trading activity with the goal of detecting suspicious behavior early to prevent potential fraud and loss of funds.

To comply with regulatory requirements

Respect for the privacy and security of data you store, the information is to ensure compliance to regulations, governmental requests and user-generated inquiries. We will not disclose or provide any personal information to third party sources without review from our legal case team and/or prior consent from the user.

To connect with you

We use personal information collected, like an email address to interact with members directly when providing customer support on log ins, transactions, security and collect feedbacks. Without processing your personal information, we will not be able to effectively respond to your submitted requests, questions, inquiries and feedbacks. All direct communications are kept confidential (your information, whether public or private, will not be sold, exchanged, transferred, or otherwise provided to any other company on any grounds without your consent, except for where doing so is expressly for the purpose of completing the transaction you require); and reviewed internally for accuracy.

E-mails maybe sent regularly (the email address that you provide for the purpose of processing orders) may be used to send information updates on your orders, in addition to newsletters, updates, related products or services information etc that we may send to you from time to time.

To measure Site performance

We actively measure and analyse data (including but not limited to those in cooperation with government agencies, public affairs institutions) to understand how our services are

used. This review is conducted by our operations team to continually improve our platform's performance and to resolve issues with the user experience. We will continuously monitor our systems' activity information and communicate with users to look for and quickly fix problems.

To enforce our Terms of Use and other agreements

We do not sell, trade, or otherwise transfer information or allow others to collect, use information; however, such information does not involve the following parties and does not include the following information: our affiliates, trusted third parties who help us operate our websites, manage our business, or provide services to you, provided that such parties agree to keep such information confidential; When we believe that information disclosure is appropriate, or it is required by any of the applicable laws, regulations, rules or by any order of courts or other competent authorities, and is necessary for executing the strategy of our Website and ensuring the proper functioning of the Website, or as may be necessary for the related parties to provide services, or for the protection of the rights, property or safety of us or other persons. However, your information will not be provided to other parties for marketing, advertising or other purposes.

It is very important for us and our customers that we continually review, investigate and prevent any potentially prohibited or illegal activities that violate our Terms. For the benefit of our entire user base, we carefully enforce our agreements with third parties and actively investigate violations of our posted Terms of Use. **FULEEX** reserves the right to terminate the provision of service to any user found engaging in activities that violate our Terms of Use.

5. HOW DOES FULEEX.IO PROTECT USER DATA

Please note that it is impossible to guarantee 100% secure transmission of data over the Internet nor method of electronic storage. As such, we request that you understand the responsibility to independently take safety precautions to protect your own personal information.

We will at best adopt appropriate physical, electronic, management and technical measures so as to protect and safeguard the security of your personal data. We will, to the greatest extent possible, ensure that any personal data collected through our Website shall be free from being subject to nuisance by any third party unrelated to us. The security measures that we may take include but are not limited to:

5.1 Physical measures: records of your personal data will be stored in a properly locked place.

5.2 Electronic measures: The computer data that contain your personal information will be

stored in computer systems and storage medias that are subject to strict login and multiple access and restrictions.

5.3 Management measures: only staff members duly authorized by us can access your personal data, and these staff members shall comply with our internal code concerning personal data confidentiality.

5.4 Technical measures: such encryption techniques as Secure Socket Layer Encryption may be used to convey your personal data.

5.5 Other measures: our network servers are protected by proper 'firewall '.

Despite of the above-mentioned technical and security measures, we cannot guarantee that the information transmitted via the Internet is absolutely safe, so we cannot absolutely guarantee that the personal data that you provide to us through our Website will be safe at any time. We will not be held liable for any loss or damage arising from or caused by any event that may occur in connection with unauthorized access to your personal data, and we shall not be held liable for compensation for such loss or damage.

5.6 If you are aware of any security flaws in our Website, please contact us immediately so that we can take appropriate action as soon as possible. Or if you suspect that your personal information has been compromised, especially account and/or password information, please lock your account and contact **FULEEX** customer care center immediately.

6. MODIFICATION TO THE PRIVACY POLICY

We reserve the right to amend the Privacy Policy from time to time and at any time. We will inform you of the modifications made to the Privacy Policy by updating and publishing the effective date of the release of new versions hereof and highlighting the amendment and posting it onto our website. Sometimes, we may issue a notice to inform you of the modification made in the Privacy Policy, which, however, is not an obligation. You shall regularly review the Privacy Policy and focus on its modifications, and if you do not agree to such modifications, you shall immediately stop accessing this Website. When an updated version of this Privacy Policy is released, your continued visit to this Website shall indicate and show that you agree to the update and agree to comply with the updated Privacy Policy.

7. CONTACT US

- We are committed to respecting the freedoms and rights of all our members (users) who have placed their trust in our service. If you should have any questions, concerns, requests and comments, please refer to our FAQ or feel free to contact us via email: info@fuleex.io, which is the only valid and official email through which we communicate with you, so we will not bear any liability for your failure to use this effective contact information, any act or

omission. We only publish announcements and information on the basis of the valid and effective contact information on the Website or post announcements on the Website; therefore, we shall not be held liable for any loss arising from your trust in the information that has not been obtained through the above-mentioned means.

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