

PRIVACY POLICY

1. INTRODUCTION

- 1.1. This privacy policy applies to this website (inspeer.io) or connected mobile applications (for instance, relevant iPhone, android and iPad apps) or related services (including the core service for peer-2-peer financing, despite the fact where such service is located) (hereinafter, the "**WEBSITE**").
- 1.2. The WEBSITE is not directed at anyone under 18 years of age.
- 1.3. This privacy policy determines the manner in which MISTRELA LIMITED (which will be renamed or is renamed to Inspeer Holdings Limited), located at CHRYSANTHOU MYLONA, 10, MAGNUM HOUSE, 3030 LIMASSOL, CYPRUS, with registration number HE 369155 (and the Manager and their its affiliates) (hereinafter, the "**COMPANY**" or "**we**") collects, processes, uses, maintains and discloses information collected from **USERS** of the WEBSITE (each, a "**USER**" or "**you**").

2. LEGAL OVERVIEW

- 2.1. Using this WEBSITE the USER confirms acceptance of this privacy policy.
- 2.2. If you continue to use the WEBSITE after this privacy policy is changed or amended, THE COMPANY will deemed you as having accepted respective changes.
- 2.3. If you do not accept this privacy policy (and (or) changes, additions and (or) amendments thereto) and (or) cookies notice, **do not use this WEBSITE**.
- 2.4. Personal data is information that can be used to identify or contact a single person.
- 2.5. THE COMPANY will collect personal data from **USERS** only if they voluntarily submit such information to it.
- 2.6. **USERS** are always entitled to refuse to submit (provide) their personally identification information, however, in certain cases it may prevent them from participating or engaging in certain WEBSITE-related activities.
- 2.7. Please do not submit your personal data (personal data) to THE COMPANY if you do not wish THE COMPANY to collect it.
- 2.8. THE COMPANY collects data in a form that does not, on its own, permit direct association with any specific individual. THE COMPANY does not consider personal data to include information that has been anonymized in the way not allowing to identify a specific USER. Such information may be collected, processed, used, transferred and disclosed for any purpose without any limitations. If THE COMPANY combines non-personal identification information with personal data, the combined information will be treated as personal data for as long as it remains combined.
- 2.9. **USERS** may visit the WEBSITE anonymously.
- 2.10. By accepting this privacy policy, you agree to being contacted by THE COMPANY or by its associates or third parties (without that being considered to any breach of law or your privacy) with marketing communications regarding various offerings by way of E-mail or SMS or push-notifications (other forms of written communication), any of which you may unsubscribe from at any time by contacting THE COMPANY, as described below.
- 2.11. Before permitting you to use the WEBSITE and requesting for Tokens, THE COMPANY may require you to provide additional information (such as a date of birth, passport number, numbers that you may use or have registered with your local tax authority, or other data which can be used for personal identification purposes and that may be required to comply with applicable laws) so that THE COMPANY can verify your identity or address. THE COMPANY may also obtain information about you from third parties such as identity verification services.
- 2.12. THE COMPANY shall not be required and may be unable to accept you as a client or investor until all Know-Your-Client and Anti-Money-Laudrery documentation THE COMPANY requires is duly executed and received, if required under applicable laws, and THE COMPANY reserves the right to reject your payments of any nature (donations, investments, payments, etc.) until it has received all necessary documentation, properly completed and duly executed.
- 2.13. The WEBSITE contains links to other sites. THE COMPANY is not responsible for the privacy policies and/or practices on other websites. When linking to another site you should read the respective privacy policy stated on that site. The privacy policy only governs information collected on Inspeer online services.
- 2.14. The privacy policy covers use of cookies by THE COMPANY and does not cover the use of cookies by any other third parties.
- 2.15. This privacy policy constitutes an integral part of Inspeer Crowdfunding Terms and Conditions (which may be amended from time to time) published at WEBSITE.
- 2.16. HEREBY you irrevocably declare:

- 2.16.1. that you have read, understood, found satisfactory and fully accepted this privacy policy; and
- 2.16.2. that you consider Inspeer Crowdfunding Terms and Conditions (including clauses related to WEBSITE) and risk warnings and risk disclosures provided in the WEBSITE in any form as an integral part of this privacy policy.

3. ABOUT THE COMPANY

- 3.1. THE COMPANY owns and operates www.inspeer.io.

4. PRIVACY NOTICE

- 4.1. As a general rule, THE COMPANY may collect only what it needs and will not share your personal data with any third parties, other than THE COMPANY's identity verification partner, Manager or its affiliates, if and where applicable.
- 4.2. THE COMPANY uses the information, provided to it by the USERS.
- 4.3. THE COMPANY may collect the following data and information (when you visit the WEBSITE, or use its products) sent to THE COMPANY by your computer, mobile phone, or other access device:
 - 4.3.1. information you have provided to us, including the WEBSITE (including but not limited to personal data, such as date of birth, passport number, numbers that you may use or have registered with your local tax authority, or other data which can be used for personal identification purposes);
 - 4.3.2. information provided by other companies who have obtained your permission to share information about you (including personal data);
 - 4.3.3. information about your interaction with adverts and services such as registration, comments (*non-personal identification information*);
 - 4.3.4. information THE COMPANY collects (or may collect) using cookies stored on your device about your WEBSITE use and/or selected third party websites¹ use (*non-personal identification information*);
 - 4.3.5. your IP address (a number identifying a specific network device on the Internet required for your device to communicate with WEBSITE);
 - 4.3.6. technical information from your device relating to the service you receive (*non-personal identification information*);
 - 4.3.7. *when you use a location-enabled device with the WEBSITE and products* - information regarding location of the device when you access and use the WEBSITE. THE COMPANY may collect such geographical location data or use various means to determine the location, such as sensor data from your device that may, for instance, provide data on nearby cell towers and wi-fi access spots;
 - 4.3.8. *non-personal identification information* - device information including, but not limited to, identifier, name, and type, operating system, other technical information about USERS means of accessing the WEBSITE, mobile network information and standard web log information, such as browser type, and the pages accessed on the WEBSITE;
 - 4.3.9. other profile data including but not limited to: personal pages, gender, age and mobile number.
- 4.4. USERS may be asked for, if appropriate, email address.
- 4.5. THE COMPANY may request you to provide information that THE COMPANY, in its sole discretion, considers as required under applicable laws, regulations and (or) policies (which include but not limited to passports, driver's licenses, utility bills, photographs of you, government identification cards), and you should provide such information if you intend to continue use of the WEBSITE and (or) receiving new services or possibilities within the WEBSITE (i.e. in case further use of the WEBSITE or designed use of the WEBSITE is not possible in absence of such information).
- 4.6. THE COMPANY may collect and use USERS information (including personal data) for the following purposes:
 - 4.6.1. to provide THE COMPANY's services;
 - 4.6.2. to ensure possibility of peer-2-peer financing (including search for possible creditors, borrowers or collateral providers, if any, use of scoring function, execution of the contracts by and between the USERS);
 - 4.6.3. for contacting the USER;

¹ For more information, please see cookies notice below

- 4.6.4. for interaction with external social networks and platforms;
- 4.6.5. for registration and authentication;
- 4.6.6. for handling payments;
- 4.6.7. for infrastructure monitoring;
- 4.6.8. for managing contacts and sending messages;
- 4.6.9. for analytics;
- 4.6.10. for interaction with support and feedback platforms;
- 4.6.11. for USER database management;
- 4.6.12. for managing support and contact requests;
- 4.6.13. to run, maintain and operate the WEBSITE (including for provision of services);
- 4.6.14. to run promotion, contest, survey or other WEBSITE features;
- 4.6.15. to comply with applicable laws or by-laws;
- 4.6.16. to send USERS information they agreed (or have requested) to receive about topics THE COMPANY considers as interesting for them;
- 4.6.17. to send USERS a service-related announcement (these communications are not promotional in nature).
- 4.7. Information is collected and processed through running the WEBSITE. The personal data may be freely provided by the User, or, in case of usage data, collected automatically when using the WEBSITE. THE COMPANY may collect personal data in a variety of ways, including, but not limited to, when USERS visit the WEBSITE, fill in a form, and in connection with other activities, services, features or resources available on the WEBSITE.
- 4.8. THE COMPANY does not sell, trade, or rent USERS personal data to others.
- 4.9. THE COMPANY may share generic aggregated demographic information not linked to any personal data regarding visitors and USERS with business partners, trusted affiliates and advertisers.
- 4.10. THE COMPANY will not release your personally-identifiable information to any third party without your consent, except as set forth herein.
- 4.11. THE COMPANY may disclose USER's personal data when THE COMPANY believes that such disclosure is necessary:
 - 4.11.1. to conform to legal requirements or to respond to a subpoena, search warrant or other legal process received by THE COMPANY, whether or not a response is required by applicable law;
 - 4.11.2. to enforce Inspeer Crowdfunding Terms and Conditions;
 - 4.11.3. for legal purposes by THE COMPANY in Court or in the stages leading to possible legal action arising from improper use of the WEBSITE or the related services;
 - 4.11.4. to reveal personal data upon request of public authorities;
 - 4.11.5. to protect THE COMPANY's rights; or
 - 4.11.6. to protect the safety of members of the public and USERS of the service and (or) the WEBSITE.
- 4.12. THE COMPANY reserves the right to share your personal data with:
 - 4.12.1. its banking partners;
 - 4.12.2. third parties, including its own subsidiaries and affiliated companies, which THE COMPANY may engage from time to time to preserve, analyse or otherwise store or manipulate data received²;
 - 4.12.3. entities THE COMPANY plans to merge with or be acquired by (the newly combined entity shall follow these terms with respect to your personal data, and you would as well receive prior notice of any change in applicable policy);
 - 4.12.4. third party identification services providers for fraud prevention purposes;
 - 4.12.5. law enforcement, government officials, or other third parties when:
 - 4.12.6. THE COMPANY is compelled to do so by a subpoena, court order, or similar legal procedure;
 - 4.12.7. THE COMPANY believes 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 Inspeer Crowdfunding Terms and Conditions; or

² In all such cases, such third-party service providers will be required to treat all such data with the same degree of care as THE COMPANY and they will be prohibited from disclosing such data to any other person or party, except as otherwise provided for in this privacy policy.

4.12.8. other third parties only with your prior consent or direction to do so.

- 4.13. THE COMPANY reserves the right to transfer personal data to a successor that has acquired such rights in result of THE COMPANY sale or substantial sale of all of its assets to that successor.

5. MAINTENANCE OF PERSONAL DATA

- 5.1. Access to USER's personal data within THE COMPANY is limited to a subset of employees who work on compliance and identity verification matters.
- 5.2. THE COMPANY adopts appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of USER's personal data, username, password, transaction information and data stored on the WEBSITE.
- 5.3. The information provided to THE COMPANY is saved indefinitely and may be stored on one or more databases directly or indirectly maintained by it.
- 5.4. While THE COMPANY cannot guarantee that loss, misuse or alteration to data will not occur, THE COMPANY makes every effort to prevent such occurrences.
- 5.5. Any other particularly sensitive information, such as credit card numbers collected for commercial transactions, is encrypted prior to transmission by you to THE COMPANY.
- 5.6. The data is kept for the time necessary to provide the services requested by the USER, or stated by the purposes outlined in this document, and the USER can always request THE COMPANY to suspend or remove the data.
- 5.7. THE COMPANY stores and processes your personal data on its servers in the EU and elsewhere in the world, where its facilities or its service providers are located. THE COMPANY or such third parties may be located in countries where the laws on processing personal data may be less strict than in your country.
- 5.8. The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. THE COMPANY protects your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. THE COMPANY uses firewalls and data encryption, physical access controls to data centers and information access authorization control.
- 5.9. In some cases, the data (including personal data of the USERS) may be accessible to certain types of persons in charge, involved with the operation of the WEBSITE (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT-companies, communications agencies) appointed by the COMPANY. The updated list of these parties may be requested from THE COMPANY at any time.
- 5.10. THE COMPANY may be sometimes required to compare the personal data provided by the USER to third party databases in order to verify its accuracy and confirm USER's identity to comply with relevant regulations. In such case THE COMPANY will not sell or rent your personal data to third parties: THE COMPANY will combine your information with information collected from other companies.
- 5.11. By submitting your personal data, you agree to this transfer, storing, or processing.
- 5.12. USERS are entitled, at any time, to know whether their personal data has been stored and can consult THE COMPANY to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to THE COMPANY in accordance with the contact information provided.

6. COOKIES NOTICE

- 6.1. When you access the WEBSITE, THE COMPANY (or Google Analytics or similar service provider) may place small data files called cookies on your computer or other device. These technologies are used for:
- 6.1.1. recognition of you as the USER;
 - 6.1.2. customizing the WEBSITE and advertising;
 - 6.1.3. measure promotional effectiveness and collect information about your computer or other access device to mitigate risk;
 - 6.1.4. help prevent fraud; and
 - 6.1.5. promote trust and safety;
 - 6.1.6. enhancing USER experience.

- 6.2. The USER may choose to set web browser to refuse cookies, or to alert when cookies are being sent. If the USER does so, please note that some parts of the WEBSITE may not function properly.

7. CHANGES IN THE PRIVACY POLICY

- 7.1. From time to time THE COMPANY may make changes to privacy policy. If THE COMPANY makes changes, THE COMPANY will post them on the WEBSITE (main page) to notify the USERS thereof.
- 7.2. A USER is bound by any minor changes to the policy when using the WEBSITE after those changes posted.
- 7.3. THE COMPANY encourages USERS to frequently check this page for any changes to stay informed about how THE COMPANY is dealing and protecting the personal data collected.
- 7.4. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

8. YOUR RESPONSIBILITIES

- 8.1. You are responsible for the security of the login information, such as usernames and passwords, which give you access to your private information maintained by THE COMPANY.
- 8.2. Make sure you keep login information in a safe place and do not share it with others.
- 8.3. Please note that key-loggers, viruses, or other surveillance devices can intercept login information on the computers from which you access the WEBSITE, so you should take precautions regarding such devices, especially from public computers.
- 8.4. You should always log out from any the WEBSITE when you are not actively using them.
- 8.5. USERS are responsible for any third party personal data obtained, published or shared through the WEBSITE and confirm that they have the third party's consent to provide the personal data to THE COMPANY. Hereby you indemnify THE COMPANY against any losses and (or) damages which may occur in case of your default in having respective consent.
- 8.6. Please be aware that whenever you voluntarily post public information to public forums (such as journals, weblogs, message boards, classifieds), such information can be accessed by the public and be used to send you unsolicited communications.

9. CONTACT DETAILS

- 9.1. Any questions or comments or requests concerning this privacy policy may be directed to the address listed on "Contact us" page of the WEBSITE.
- 9.2. To report abuse, please contact support as listed on "Contact us" page of the WEBSITE.