

TokenPie Privacy Policy

Last Revised: July 31, 2018

TokenPie is formed by Consensus Capital Pte. Ltd. and its affiliates (“**TokenPie**”, “**we**” or “**us**”) respect the privacy of users of its website at <http://tokenpie.io> (the “**Site**”) and related services (“**User**” or “**you**”) and are committed to protect the personal information that their Users share with them. We believe that you have a right to know our practices regarding the information we may collect and use when you visit and/or use our Site.

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use, into which this Privacy Policy is incorporated by reference.

- **Your Consent (PLEASE READ CAREFULLY!)**

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY (THE “**PRIVACY POLICY**”), INCLUDING TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION (AS DEFINED BELOW). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT ACCESS OR USE THE SITE OR SERVICE.

FOR AVOIDANCE OF DOUBT, YOU HEREBY CONSENT TO THE COLLECTION, PROCESSING, TRANSFER AND USE OF YOUR PERSONAL INFORMATION. YOU ALSO ACKNOWLEDGE AND CONFIRM THAT YOU ARE NOT REQUIRED TO PROVIDE US WITH YOUR PERSONAL INFORMATION AND THAT SUCH INFORMATION IS *VOLUNTARILY* PROVIDED TO US.

- **Which information we may collect on our Users?**

We may collect two types of data and information from our Users:

1. Non-identifiable and anonymous information (“**Non-personal Information**”). **We are not aware of the identity of the User from whom we have collected the Non-personal Information.** Non-Personal Information is any unconcealed information which does not enable identification of an individual User, and which is available to us while such User is entering into and/or using the Site. Non-personal Information which is being gathered consists of technical information, behavioral information and aggregated information, and may contain, among other things, the activity of the User on the Site, type of operating system, User's 'click-stream' or searches on the Site, type and version of browser, version of flash, type and version of mobile device (if applicable), keyboard language, screen resolution, etc.

2. Personally identifiable information (“**Personal Information**”). **This information may identify an individual or may be of a private and/or sensitive nature.**

- Users of the Site automatically provide their IP address mainly for enhancing the User’s experience and for geo-location and security purposes as further detailed below.
- In addition, Personal Information which is being gathered consists of any personal details provided consciously and voluntarily by the User:

The Personal Information is collected from the details the Users provide in the Contact and registration form on the Site or in our promotions such as landing pages banners etc. which may include, the User's name, User's address, User's e-mail address, geo-location, personal identifier, financial information, zip code and public key to the wallet that the User will provide generate. The User will provide documents and information required in order to complete the know your customer and anti-money laundering check or any other regulatory check as may be imposed at any time on TokenPie. For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

We do not collect any Personal Information from you or related to you without your approval, which is obtained, through your active acceptance to the Privacy Policy.

- **How Do We Collect Information on Our Users?**

There are a few methods that we use:

1. **We collect information through your entry and use of the Site.** In other words, when you are using the Site we are aware of it and may gather, collect and store the information relating to such usage.
2. **We collect information which you decide to provide us voluntarily.** For example, we collect Personal Information when you contact us through the Contact Form or through registration.

We may gather, collect and store such information either independently or through the help of our authorized third-party service providers as detailed below.

- **What are the Purposes of the Collection of Information?**

Non-personal Information is collected in order to:

- Use it for statistical and research purposes and for customization and improvement of our Site and services.
- Learn about the preferences of Users and general trends on and uses of the Site and services (e.g. understand which features are more popular than others).

Personal Information is collected in order to:

- Open an account on the Site.
 - Personalize user experience on the Site.
 - Verify the User's identity.
 - To allow the User to purchase tokens through the TokenPie Site.
 - Provide the Users with commercial materials, updates about TokenPie's developments, new offerings, news regarding the Site and services, etc.
 - Be able to contact Users for marketing and sales purposes.
 - To conduct online surveys to better understand your business needs and how we can improve our products and services.
 - Provide Users with updated information regarding our products and services.
 - Perform know your customer and anti-money laundering check.
 - Determine general geo-location information (i.e., country) from which the User's computer or device is connected to the Internet in order for us to know the general location of our Site's Users as well as in order to safeguard our Site.
- **Sharing Information with Third Parties**

TokenPie will not share any Personal Information it collects with any third party, other than in the following circumstances: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy, including investigation of potential violations thereof; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (e) to protect the rights, property, or personal safety of TokenPie, its Users or the general public; (f) by virtue of undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of TokenPie, so long as such acquirer maintains the same privacy terms here under; (g) perform know your customer and anti-money laundering check; or (h) pursuant to your explicit approval prior to the disclosure.

Note, that we collect, hold and/or manage Personal Information through TokenPie's authorized third parties vendors of certain products or services (such as, hosting cloud services) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes. In addition, we share Personal Information with third parties vendors who perform know your customer and anti-money laundering check. Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction.

For avoidance of doubt, TokenPie may use Non-personal Information and transfer and disclose it to third parties at its discretion.

- **Deletion or Modification of Personal Information**

In any event, if for any reason you (or any person) wish to delete or modify Personal Information, please send us an e-mail with adequate detail of your request to: sales@tokenpie.io and we will make reasonable efforts to modify or delete any such Personal Information pursuant to any applicable privacy laws. Note that unless otherwise explicitly specified herein and/or unless you instruct us otherwise we may retain your Personal Information for as long as reasonably required for the purposes of which such Personal Information was collected, all as permitted under any applicable privacy laws.

Aggregated and/or anonymous information derived from your use of the Site may remain on our servers indefinitely.

- **Minors**

The Site is intended for Users over the age of eighteen (18). Therefore, TokenPie does not intend and does not knowingly collect Personal Information from children under this age. We reserve the right to request proof of age at any stage so that we can verify that minors under this age are not using the Site.

- **Security**

We take reasonable measures to maintain the security and integrity of our Site and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur. TOKENPIE SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION.

- **Third Party Service Providers**

While using the Site we may be using third party service providers, who may collect, store and/or process the information detailed herein. TokenPie uses commercially reasonable efforts to engage with third parties that post a privacy policy governing their collection, processing and use of non-personal and personal information.

Cookies and Other Tracking Technologies

When you access or use the Site, we or our third party service providers may use industry-wide technologies such as “cookies” or other similar technologies (such as web beacons) which store certain information on your computer or device (“**Cookies**”), which will allow us to enable automatic activation of certain features and make your experience much more convenient and effortless. We or our authorized third party service providers may use both session cookies (which expire once you close the Site) and persistent

cookies (which stay on your system until you delete them). It is easy to disable or delete Cookies. Most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you disable or erase cookies, your online experience may be limited. Cookies usually store only a Non-personal Information, such as the web pages you have visited, the duration of your browsing, etc. TokenPie does not control such third party service providers.

- **International Data Transfer**

In order to provide the Site, we may transfer information collected about you, including Personal Information, to affiliated entities, or to other third party service providers (as provided herein) across borders and from your country or jurisdiction to other countries or jurisdictions around the world. Please note that we may transfer such information to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to such transfer of information.

- **Direct Marketing**

You hereby agree that we may use your contact details you provided us with (including, without limitation, e-mail address and phone number) for the purpose of providing you commercial and/or non-commercial materials related to our current and/or future products and services. You may withdraw your consent by sending a written notice to TokenPie's e-mail address that appears in the Site or alternatively follow the instructions for removing yourself from the mailing list which are available in the message transmitted to you.

- **Push Notifications/Alerts**

TokenPie via third parties such as Google chrome, may send push notifications or alerts. You can deactivate these messages at any time by changing the notification settings on your device.

- **Changes to the Privacy Policy**

The terms of this Privacy Policy will govern the use of the Site and any information collected therein. TokenPie reserves the right to change this policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this policy on the homepage of the Site and/or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such substantial changes will take effect seven (7) days after such notice was provided on our Site or sent by e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date and your continued use of the Site after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Terms should be amended to comply with any legal requirements, the

amendments may take effect immediately, or as required by law and without any prior notice.

- **Questions?**

If you have any questions (or comments) concerning this Privacy Policy, you are most welcome to send us an email to the following address: *support@tokenpie.io*