

# Privacy Policy

Effective date: 27 November 2018

When you are using **IXO WORLD AG's** ("**We**", "**IXO**" or "**the Company**") services and electronic media, ie. When you are accessing the website, subscribing to our newsletter and any other marketing initiatives, utilising it for becoming a member (including whitelisting) and participating in the IXO Token Sale by making contribution / payment to purchase IXO Tokens, we may collect, process and/or disclose data that identify you or make you identifiable ("**Personal Data**") in accordance with this privacy policy ("**Policy**"). We treat your Personal Data confidentially, in accordance with the applicable data protection laws and, in particular, with the EU General Data Protection Regulation (the "**GDPR**").

This Policy is meant to inform you which Personal Data we collect, store, process, use and/or disclose, for which purposes and on which legal basis. We further inform you about your rights in regards to your Personal Data. We will erase your Personal Data when it is no longer required for the purposes listed in this Policy. We also erase your Personal Data either by your request or if further storage is neither required nor permitted by applicable laws.

This Policy was lastly updated on the effective date noted above. This Policy may be amended or updated from time to time to reflect changes in our privacy practices with respect to the processing of Personal Data or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page, to review any changes we might make.

## Definitions

- '**Controller**': The entity that decides how and why Personal Data is processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- '**Data Protection Authority**': An independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- '**EEA**': The European Economic Area.
- '**Process**', '**Processing**' or '**Processed**': Anything that is done with any Personal Data, automated or not, such as: Collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- **‘Processor’:** Any person or entity that Processes Personal Data on behalf of the Controller (other than Employees of the Controller).
- **"New Token":** means all Blockchain Tokens designed, developed, or implemented by or on behalf of us.
- **‘IXO Token Sale / Launch / Distribution’:** means the entire Token Sale / Launch / Distribution event which shall include either all or any of the stages as defined above viz. Final, Private, Public Pre- Token Sale / Launch / Distribution event
- **‘Services’:** Any services provided by us.
- **‘Sensitive Personal Data’:** Personal Data containing information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, or any other information that may be deemed to be sensitive under applicable law(s).

## 1. **Name and contact details of the Controller**

IXO World AG (Liechtenstein)  
Heiligkreuz 6, 9490 Vaduz

Email: *support@ixo.world*.

## 2. **Which Categories of Personal Data we process**

When you use the website, the IXO network, subscribe to our newsletter (or any other marketing initiatives), become a member (including whitelisting) or participate in the IXO Token Sale, we may collect the following categories of Personal Data about you:

- Personal details: name, gender, date of birth / age, nationality, passport or national ID number, social security number, tax identification number;
- Contact details: address, e-mail address, telephone number, social media account details;
- Financial details: bank statements, credit card statements, utility bill, credit report, other financial details with respect to checking the proof of source of funds such as income statements, salary slips, etc. and similar data for ‘Accredited Investor’ verification for residents of the United States of America, Canada or other such jurisdictions;
- Corporate details: name, place of registration, registration number, transparency register number, details with respect to articles of association and other similar documents / certificates, details with respect to

shareholders and/or beneficial owners (including their personal and contact details);

- Technical information of your device which you use for orders and communication (cell phone, tablet, notebook, personal computer, etc. (e.g. IP address),
- Log in information (e-mail address, password); and
- your cryptowallet address.

When we are involving third party Processors into the performance of our services and contractual obligations and such involvement requires the sharing of Personal Data, we have entered with our third party Processors into data processing agreements in accordance with Art. 28 of the GDPR and, as far as required, further appropriate safeguards according to Art. 46 - 49 GDPR.

Specifically, we involve the following Processors in the membership process:

**Fractal:** (Processor)

Our data processor Fractal Blockchain GmbH, c/o Space Shack, Akazienstr. 3a, 10823 Berlin, Germany ("Fractal"), is processing all the Personal Data on our behalf to fulfil the contract, especially for customer identification. Fractal processes Personal Data only in Germany.

**Heroku:** (Sub-processor)

To store all Personal Data collected and processed during the whitelisting process, we are working together with "Heroku", a service provided by our data processor Heroku Inc., located at The Landmark @ 1 Market St., Suite 300, San Francisco, CA, 94105, United States. Heroku stores Personal Data only in Ireland.

For further information, please see Heroku's data security explanations <https://www.heroku.com/policy/security> as well as Heroku's Privacy Policy: <https://www.salesforce.com/company/privacy/>

**AWS:** (Sub-processor)

To store all Personal Data collected and processed during the membership process, we also use Amazon Simple Storage Service, a service provided by our data processor Amazon Web Services, Inc., 410 Terry Avenue North, Seattle WA 98109, United States ("AWS"). AWS stores your Personal Data only in Frankfurt, Germany.

For further information, please see AWS's Privacy Policy: [https://aws.amazon.com/privacy/?nc1=h\\_ls](https://aws.amazon.com/privacy/?nc1=h_ls).

**LexisNexis:** (Sub-processor)

To check your name against AML databases during the whitelisting process, we use the CDDS AML Risk API, a service provided by our data processor LexisNexis

GmbH ("LexisNexis"). LexisNexis processes your personal data i.e. your name and passport or National ID no. in compliance with the applicable data protection law(s).

For further information, please see LexisNexis' Privacy Policy:  
<https://www.lexisnexis.com/en-us/privacy/default.page>

**Zendesk:** (Sub-processor)

We use Zendesk's contact form widget and email service to correspond with you in case we need more information or documents (e.g. missing information or clear copies of your identity proof or proof of address) from you so as to process your whitelisting application. "Zendesk" is a service by Zendesk Inc., of 1019 Market St., San Francisco, CA 94103, USA. The information or documents you send to us via Zendesk's contact form, your Personal Data is collected and stored in the USA. Zendesk is certified under the EU Privacy Shield and thus guarantees compliance with European data protection laws.  
<https://www.zendesk.com/company/customers-partners/eu-data-protection/>

**Freshdesk:** (Sub-processor)

We use Freshdesk services to resolve queries related to the use of ixo.world website and project onboarding, as well as supporting our members through the registration process. Freshdesk is a service by Freshworks of 1250 Bayhill Drive, Suite 315, San Bruno, CA 94066, USA.

For further information, please see Freshwork's Privacy Policy:  
<https://www.freshworks.com/privacy/>

**Viral Loops:** (Sub-processor)

We use Viral Loops to grow our community through running referral campaigns and get our content and message spread more widely. This is a service provided by Viral Loops, of 21 Aylmer Parade Aylmer Road, London, United Kingdom.

For further information, please see Viral Loops' Privacy Policy:  
<https://viral-loops.com/privacy>

**Kickoff Labs:** (Sub-processor)

We use Kickoff Labs services to set up viral campaigns that will lead to an increase in ixo members and ixo network usage. This is a service provided by Kickoff Labs, of 4111E Madison St, #19 SEattle, WA 98112.

For further information, please see Kickoff Labs' Privacy Policy:  
<https://kickofflabs.com/privacy-policy/>

We also may disclose your Personal Data to other third parties:

- banks, credit agencies and other financial authorities and regulators

### **3. For what purposes, and how we process, your Personal Data**

#### **I. Use of Website (Cookies and other tracking technologies) and in order to become a member:**

- When you visit the Website, access the ixo Network, become a member and participate in the IXO Token sale, your device and browser may automatically store an identifier to continue using the Website and/or the Whitelisting-Process later and disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a website and other technical communications information), some of which may constitute Personal Data. We do this to improve services we offer you, to improve marketing, analytics, and provide site functionality. You always have the option of deleting that identifier from your device at any time.
- The legal basis for such data processing is Art. 6 para. 1 lit. a & b GDPR. It originates from your consent and/or the contractual relationship that you may enter into with us, in this case, the contractual relationship includes the "TERMS AND CONDITIONS OF MEMBERSHIP TO USE IXO.WORLD AND PURCHASE IXO SUBSCRIPTIONS (INCLUDING IXO TOKENS)" and the becoming a member / whitelisting and payment part of it which are governed by the aforementioned legal agreements(s).
- We require your Personal Data to carry out our contractual obligations that arise from the contract that you may enter into with us. Without disclosing the Personal Data to us, we won't be able to conclude the contract and perform any of our contractual obligations.
- The data collected for this purpose is stored for up to 5 years.

#### **II. Membership / Whitelisting:**

- For the purpose of implementing the Know Your Customer (KYC) / Anti Money Laundering (AML) check
- When we provide you with access to the Website (e.g., when you register as a party to enter into the IXO Token sale);
- When you participate in the whitelisting process
- When we receive your Personal Data from third parties who legally provide it to us, such as credit reference agencies or law enforcement agencies;
- We use your email address to grant you access to the Website and enable you the use of the Website.
- We use your Personal, Contact, and Financial Details and where applicable Corporate details to identify (whitelist) you as per the applicable and relevant KYC guidelines and AML regulations

- Contact form: We use Freshdesk's contact form widget and email service to interact with you in case you need assistance with any of our products and services. "Freshdesk" is a service by Freshworks, of 1250 Bayhill Drive, Suite 315, San Bruno, CA 94066, USA. The information or documents you send to us via Freshdesk's contact form, your Personal Data, is collected and stored in the USA. Freshworks enables GDPR support for all customers worldwide. For further information, please see Freshwork's Privacy Policy: <https://www.freshworks.com/privacy/>
- The legal basis of such processing is Art. 6 para. 1 lit. b) GDPR.
- We need your Personal Data to process your whitelisting application and identify you as per the relevant KYC guidelines and AML regulations. The whitelisting process is necessary as preparation for the contract we may conclude with you. Without carrying out the whitelisting process, we won't be able to whitelist you and allow your participation in the IXO Token sale and to perform any contractual obligations.
- The data collected for this purpose is stored for up to 5 years.

### III. Contribution:

- For the purpose of implementing the IXO Token sale
- We may collect your Personal Data in the ordinary course of our relationship with you (e.g., Personal Data we obtain in the course of administering your payment to purchase IXO Tokens in the IXO Token sale);
- We use your cryptowallet address to administer your contribution / payment to purchase IXO Tokens.
- Legal basis for such data processing is Art. 6 para. 1 lit. b GDPR. It originates from the contractual relationship that you may enter into with us, in this case, the contractual relationship includes the "TERMS AND CONDITIONS OF MEMBERSHIP TO USE IXO.WORLD AND PURCHASE IXO SUBSCRIPTIONS (INCLUDING IXO TOKENS" and becoming a member and payment part of it which are governed by the aforesaid legal agreement.
- We need your Personal Data to carry out our contractual obligations that arise from the contract that you may enter into with us. Without disclosing the Personal Data to us, we won't be able to conclude the contract and perform any contractual obligations.
- The data collected for this purpose is stored for up to 5 years.

### IV. Marketing

For marketing purposes, we use your email address only if, and as long as, we have received your explicit prior consent and in accordance with the respective applicable additional legal requirements in your jurisdiction.

In the event you consent to our Marketing Policy, we may transfer your Personal Data to our business affiliates

- Fractal Launchpad GmbH (Berlin, Germany),
- Fractal Blockchain GmbH (Berlin, Germany)
- KickOff Labs (Seattle, USA)
- Viral Loops (London, UK)

in order for us or our business affiliates to inform you via email about upcoming opportunities that are similar to the IXO Token sale, or TOKEN Launch events or to market and promote our respective products and services.

The legal basis is Art. 6 para. 1 lit. a GDPR. You may revoke your consent at any time.

- The data collected for this purpose is stored for up to 5 years.

#### 4. **Links to Business Partner and Co-Branded Sites**

Certain links on the ixo.world website may direct you to co-branded websites maintained by ixo.world AG or to companies which the Company has established business relationships. When you submit information to these co-branded sites or partner companies, you may be submitting it to the Company or to these business partners. Under no circumstances may **IXO.WORLD AG** be held responsible for the privacy practices of these business partners and we therefore strongly encourage you to read their respective privacy policies as they may differ from ours.

#### 5. **Your rights when we process your Personal Data**

You have the following rights if the legal conditions of such rights are met. You may exercise them at any time.

a. **Right of access**

You have the right at any time to demand information on whether we are processing your Personal Data.

b. **Right of rectification**

You have the right to demand of us to correct and/or complete your personal data if your personal data processed is incorrect or incomplete.

c. **Right of erasure**

You may demand your personal data to be deleted if (i) the personal data concerning you is no longer necessary for the purposes for which they were collected or otherwise processed; (ii) you revoke your consent to the processing and there is no other legal basis for the processing; (iii) your personal data have been processed illegally; (iv) the deletion of your personal data is necessary to fulfil a legal obligation under Union law or the law of the Member States to which we are subject.

d. **Right to restriction of processing**

You may request to restrict the processing of your personal data if (i) you deny the accuracy of the personal data for a period of time that enables us to verify the accuracy of the personal data; (ii) the processing is unlawful and you refuse to delete the personal data and instead request the restriction of the use of the personal data; (iii) we no longer need your personal data for the purposes of processing, but you need them to assert, exercise or defend legal claims.

e. **Right to data portability**

You have the right to obtain your personal data in a structured, commonly used and machine-readable format. You have the right to transmit your data to another Controller. Where technically feasible, you have the right to have your data transmitted directly from us to another Controller.

f. **Right to withdraw consent**

Any consent is provided freely. If you give us your consent to process your Personal Data, you have the right to revoke your consent at any time. The revocation of consent does not affect the lawfulness of processing based on consent before its revocation. To withdraw your consent, please send us an e-mail to [support@ixo.world](mailto:support@ixo.world)

g. **Right to object**

You have the right to object to the processing of your personal data for certain processing purposes. If we process your data on the basis of a legitimate interest (pursuant to Art. 6 para. 1 f GDPR), you have the right to object to this processing at any time for reasons arising from your particular situation. Such reasons exist in particular if they give special weight to your interests and therefore outweigh our interests. For example if we are not aware of these reasons and it could therefore not be taken into account in the context of weighing up interests.

If your Personal Data is processed in order to carry out direct advertising, you have the right to object at any time to the processing of Personal Data for the purpose of such advertising; this also applies to profiling, insofar as it is associated with such direct advertising.

h. **Right to lodge a complaint with the supervisory authority**

You have the right to address the supervisory authority for any questions or complaints. The supervisory authority is Liechtenstein Data Protection Office, Städtle 38, P.O. Box 684, FL-9490 Vaduz, Principality of Liechtenstein.

<https://www.datenschutzstelle.li/>

Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our services or products to you or administer any contractual relationship in place. Such withdrawal may also result in the termination of any agreement you may have with us. Our legal rights and remedies are expressly reserved in such event.