

# PRIVACY POLICY

Last updated: 18/10/2017

This Privacy Policy explains how CyberTrust S.A. ("Entity") collects, stores, uses and protects personal information. You accept this Privacy Policy when you use Entity's services or any other features, technologies or functionalities offered by Entity on Entity's web-site or through any other means.

## 1. Collection of Information.

When you use Entity's web-site [www.cybertrust.io](http://www.cybertrust.io) ("Site") or Entity's services, you may provide your personal information voluntarily, including but not limited to:

Your name

Residential address

Email address

Mailing address

Username and password

Digital wallet address or bank account information, depending on your method of payment.

In addition, you may provide some information involuntarily such as any information sent to Entity by your computer, mobile phone or other access device, or any other personal information you may choose to provide. This information may include your IP address, device information, including but not limited to identifier, name and type, operating system, location, mobile network information and standard web log information, such as your browser type, traffic to and from Entity's Site and the pages you accessed on Entity's Site.

In addition, Entity may collect personal information from or about you in other ways such as your interaction with customer support or contractual relationships with Entity.

Entity is not obligated to collect any of your information and may do it at its own discretion.

By providing Entity with your personal information, you also consent for Entity to collect, hold, use and disclose your personal information in accordance with this Privacy Policy. In addition to providing the foregoing information, if you choose to correspond further with Entity through e-mail or through the "contact" section of our Site, Entity may retain, use and disclose the content of your messages together with your e-mail address and responses.

## 2. Setting up and Using an Account.

In order to purchase tokens thorough Entity Site, you are required to set up a personal account and provide your personal information such as name and email address to secure your access to your account. Entity may require you to provide additional information to verify your identity, address or any other information in your account, such as your date of birth, copy of ID, citizenship, country of residence, and other information directly or through a third party. Entity is not obligated to verify your identity or any other personal information and may do it at its own discretion. You can review your personal information inside of your account. You can edit your personal information or delete your account by contacting Entity customer service. If you cancel or delete your account, Entity may keep your information in its database. This may be necessary to deter fraud by ensuring that a person who tries to

commit fraud will not be able to avoid detection simply by closing his/her account and opening a new account. However, if you close your account, your personally identifiable information will not be used by Entity for any further purposes, nor sold or shared with the third parties, except as necessary to prevent fraud or money laundering and assist law enforcement in accordance with this Privacy Policy.

### **3. Use of Cookies.**

Entity or its partners may place small data files (cookies) or pixel tags on your computer or other device when you access Entity Site. Entity may use these technologies to recognize you as a returning user, customize its services, content and advertising, evaluate marketing activities, and collect information about your computer or other access device. Entity may use various cookies, including but not limited to session cookies, persistent cookies, and “flash cookies.” Entity may codify its cookies to limit access of third parties to the received information. You can independently control the use of cookies from your browser or browser add-ons; however, blocking or disabling Entity’s cookies may interfere with your use of Entity’s Site. Entity is not obligated to place cookies on your computer and may do it at its own discretion.

### **4. Use of Log Files.**

Entity may use the log files to collect your Internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, and number of clicks to analyze your activity on the Site, collect geographic and demographic information, and evaluate content of the Entity’s Site. Information collected from log files is not personally identifiable. Entity is not obligated to use log files and may do it at its own discretion.

### **5. Storing, Using, and Sharing Your Personal Information.**

Entity will store your personal information in its database. Entity may contract third parties to store your personal information. Entity does not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. Entity may use your personal information to customize your use of Entity’s Site and services; analyze your activity on Entity’s Site, including through third parties such as Google Analytics and alike; evaluate and improve its marketing efforts and for other reasons relevant to your use of Entity’s Site and services.

Entity will only share information about you in one of the following ways:

- With your consent or at your instruction;
- With Entity’s current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with Entity or Entity’s offices internationally;
- With third parties or service providers that perform work for Entity;
- With other third parties with your consent or direction to do so.
- With Escrow or any other processor of your payment.
- With third parties who provide services to Entity for storing your personal information, fraud prevention, marketing and technology; such third parties are bound by contracts with confidentiality and non-disclosure clauses and may not use your personal information for any reason other than specified in this Privacy Policy.

- Certain information you may choose to share may be displayed publicly, such as your username and any content you post when you use interactive areas of our Website like Entity online forums;
- In connection with a merger or sale of Entity assets, or if Entity do a financing or is involved in an acquisition or any other situation where information may be disclosed or transferred as one of our business assets;
- In response to a request for information if Entity believes disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- With law enforcement, government officials, or other third parties when Entity is required to provide your personal information by law, subpoena or court order.
- If Entity believes your actions are inconsistent with Entity's user agreements or policies, or to protect the rights, property and safety of any of Entity and its affiliates; and
- With third parties where aggregate information is disclosed which cannot be reasonably be used to identify you.

## **6. Protection of Personal Information**

Entity takes reasonable steps to protect the security of the information communicated through the Site. However, no computer security system is entirely foolproof and the Internet is not a secure method of transmitting information. As a result, Entity does not assume any responsibility for the data you submit to or receive from Entity through the Internet or for any unauthorised access or use of that information and Entity cannot and does not guarantee that information communicated by you to Entity or sent to you by Entity will be received or that it will not be altered before or after its transmission to Entity.

You agree to not hold Entity and its respective past, present and future employees, officers, directors, contractors, consultants, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns liable for any loss or damage of any sort incurred as a result of any misappropriation, interception, modification, deletion, destruction or use of information provided through the Site.

## **7. Hyperlinks and Third-Party Sites**

The Site may contain links to other third party websites that may collect personal information about you, including through cookies or other technologies. If you link to another website, you will leave the Site and this Privacy Policy will not apply to your use of and activity on those other websites. You should consult these other websites' privacy policies as Entity has no control over them and is not responsible for any information that is submitted to or collected by these third parties.

## **8. Change of Privacy Policy.**

Entity may amend this policy at any time and in its own discretion by posting an updated version on Entity's Site. The updated version becomes effective at the time of posting. It is your responsibility to check updates regularly.

## **9. Contact Us.**

If you have any questions about this Privacy Policy, please contact us at [compliance@cybertrust.io](mailto:compliance@cybertrust.io)