

ICONOMI

PRIVACY POLICY

for

ICONOMI DIGITAL ASSET MANAGEMENT PLATFORM

May 2018
Last changed: May 22nd 2018

Welcome to ICONOMI's privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you on how we look after your personal data when you access content we own or operate on the website located at iconomi.net, or any other websites, pages, features, or content we own or operate and/or when you use the ICONOMI mobile app and related services and tell you about your privacy rights and how the law protects you.

Please take a moment to read this Privacy Policy carefully. If you have any questions about this Privacy Notice, please contact us at data.protection@iconomi.com.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. ACCEPTANCE OF PRIVACY POLICY

- 1.1 By accessing and using our services, you signify acceptance of the terms of this Privacy Policy. Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below.
- 1.2 If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our services.

2. CONSENT

- 2.1 The data you provide in relation to using our services is processed with your explicit and unequivocal consent based on article 6 paragraph (1), letter (a) of the General Data Protection Regulation (GDPR).

3. WHO WE ARE

- 3.1 ICONOMI Limited is a private limited company incorporated in Malta with company number C 83445 and whose registered office is 103, Palazzo Pietro Stiges, Strait Street, Valletta VLT 1436, Malta. As a service provider for the operation of the ICONOMI platform, ICONOMI Limited is a data controller with

regard to personal data pertaining to provision of services on the ICONOMI platform and the responsible entity for the website iconomi.net and the ICONOMI mobile app.

- 3.2 As a data controller, we determine the means and purposes of processing data in relation to cryptocurrency transactions. If you have any questions about your ICONOMI Account, your personal information or this Privacy Policy, please direct your questions to data.protection@iconomi.com.

4. PERSONAL INFORMATION WE COLLECT

- 4.1 Personal information is data that can be used to identify you directly or indirectly, or to contact you. Our Privacy Policy covers all personal information that you voluntarily submit to us and that we obtain from our partners. This Privacy Policy does not apply to anonymised data, as it cannot be used to identify you.
- 4.2 You may be asked to provide personal information anytime you are in contact with any ICONOMI group companies. The ICONOMI group companies may share your personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, and content (see the section below).
- 4.3 Except as described in this Privacy Policy, we will not give, sell, rent or loan any personal Information to any third party.

5. PERSONAL INFORMATION COLLECTED

- 5.1 We collect personal information to provide you with our services. When we require certain personal information from users it is because such information is relevant for specified purposes. Any information you provide to us that is not required is voluntary. You are free to choose whether to provide us with the types of personal information requested, but we may not be able to serve you as effectively or offer you all or any of our services when you choose not to share certain information with us.
- 5.2 For example, we collect personal information when you use or request information about our services, subscribe to marketing communications, request support, complete surveys, or sign up for an event. We may also collect personal information from you offline, such as when you attend one of our events. We may use this information in combination with other information we collect about you.
- 5.3 In addition, we may collect personal information disclosed by you on our message boards, chat features, blogs and our other services to which you are able to post information and materials. Any information that is disclosed in those forums becomes public information and may therefore appear in public ways, such as through search engines or other publicly available platforms, and may be "crawled" or searched by third parties. It could also be read, collected or used by other users to send you unsolicited messages. Please do not post any information that you do not want to reveal to the public at large.

- 5.4 You are free to choose whether to provide us with the types of personal information described below, but we may not be able to serve you as effectively or offer you some or all of our services when you choose not to share certain information with us.
- 5.5 Here are some examples of the types of personal information we collect and how we may use it:
- (a) When you create an account or use our services, we, or our affiliates' vendors acting on our behalf, may collect the following types of information: your name, date of birth, driver's license ID, personal ID, passport, address, nationality, phone number, email, Ethereum or other wallet address. We will use this information to fulfill your requests and provide the relevant services. We may also obtain information about you from third parties such as identity verification services.
 - (b) Whenever you contact us or respond to our communications (e.g., email, telephone, written), we receive your contact information and any other personal information you choose to provide us. We will use such information to fulfill your requests or to provide you with our services.

6. HOW PERSONAL INFORMATION IS USED

- 6.1 Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customised experience. In general, we use personal information to create, develop, operate, deliver, and improve our services, content and advertising, and for loss prevention and anti-fraud purposes. Examples of how we may use this information include:
- (a) To provide you with our services and customer support that you request.
 - (b) To process transactions and send notices about your transactions.
 - (c) To verify your identity by comparing your personal information against third-party databases.
 - (d) To send administrative or account-related information to you.
 - (e) To better understand our customers and end-users and the way they use and interact with our websites, mobile apps, and services.
 - (f) To provide a personalised experience, and implement the preferences you request.
 - (g) To customise, measure, and improve our services and the content and layout of our website and applications.
 - (h) To enhance security, prevent fraud, monitor and verify identity or service access, combat spam or other malware or security risks.
 - (i) To deliver targeted marketing, service update notices, and promotional offers based on your communication preferences (where this is in accordance with the law).
 - (j) To interact with you on third party social networks (subject to that network's terms of use).

- (k) To communicate with you about our events or our partner events.
 - (l) To prevent and investigate potentially prohibited or illegal activities, and/or violations of our posted user terms.
 - (m) To resolve disputes, collect fees, and troubleshoot problems.
 - (n) To comply with legal obligations.
 - (o) To enforce our agreements with third parties.
 - (p) For quality control and staff training.
- 6.2 We will not use your personal information for purposes other than those purposes we have disclosed to you, without your permission. From time to time we may request your permission to allow us to share your personal information with third parties. You may opt out of having your personal information shared with third parties, or allowing us to use your personal information for any purpose that is incompatible with the purposes for which we originally collected it or subsequently obtained your authorisation. If you choose to so limit the use of your personal information, certain features or our services may not be available to you.

7. INFORMATION FROM THIRD PARTY SOURCES

- 7.1 From time to time, we may obtain information about you from third party sources as permitted by applicable law, such as public databases and ID verification partners.
- 7.2 We obtain information about you from public databases and ID verification partners for purposes of verifying your identity. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information may include your name, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. The legal basis for such processing is to comply with our legal obligations, such as anti-money laundering laws. In some cases, we may process additional data about you based on public interest grounds to ensure our services are not used fraudulently or for other illicit activities.
- 7.3 Once we obtain such information from third parties, we do not subsequently share it with any other third parties except as described in this Privacy Policy. This information is shared with our processors and corporate group as necessary to perform our services.

8. COLLECTION & USE OF INFORMATION COLLECTED AUTOMATICALLY

- 8.1 We receive and store certain types of information automatically, such as whenever you interact with the our website, our apps or use our services. This information does not necessarily reveal your identity directly but may include information about the specific device you are using, such as the hardware model, device ID, operating system version, web-browser software (such as Firefox,

Safari, or Internet Explorer) and your Internet Protocol (IP) address/MAC address/device identifier.

- 8.2 For example, we automatically receive and record information on our server logs from your browser, including how you came to and used our services; your IP address; device type and unique device identification numbers, device event information (such as crashes, system activity and hardware settings, browser type, browser language, the date and time of your request and referral URL), broad geographic location (e.g. country or city-level location) and other technical data collected through cookies, pixel tags and other similar technologies that uniquely identify your browser. We may also collect information about how your device has interacted with our website, including pages accessed and links clicked. We may use identifiers to recognise you when you arrive at our website via an external link, such as a link appearing on a third party site.
- 8.3 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.
- 8.4 Information collected by cookies will be used to improve our services by knowing for example which features or services are most popular for users and based on such information we can make the Services more interesting to more users.
- 8.5 Please refer to the [Terms and Conditions for the Use of the ICONOMI Website](#) for more information about our use of cookies.

9. HOW WE PROTECT AND STORE PERSONAL INFORMATION

- 9.1 We understand how important your privacy is, which is why we maintain (and require our service providers to maintain) appropriate physical, technical and administrative safeguards to protect the security and confidentiality of the personal information you entrust to us.
- 9.2 We may store and process all or part of your personal and transactional information, in the EEA and elsewhere in the world where our facilities or our service providers are located. We protect your personal information by maintaining physical, electronic, and procedural safeguards in compliance with the applicable laws and regulations.
- 9.3 For example, we use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to personal information only for those employees who require it to fulfill their job responsibilities.
- 9.4 However, we cannot guarantee that loss, misuse, unauthorised acquisition, or alteration of your data will not occur. Please recognise that you play a vital role in protecting your own personal information. When registering with our services, it is important to choose a password of sufficient length and complexity, to not reveal this password to any third-parties, and to immediately notify us if you become aware of any unauthorised access to or use of your account.

- 9.5 Furthermore, we cannot ensure or warrant the security or confidentiality of information you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us at the email address or mailing address listed at the end of this Privacy Policy.

10. HOW WE SHARE PERSONAL INFORMATION WITH OTHER PARTIES

- 10.1 We take care to allow your personal information to be accessed only by those who really need to in order to perform their tasks and duties, and to share with third parties who have a legitimate purpose for accessing it. We will never sell or rent your personal information. We will only share your data in the following circumstances:
- (a) We share your information with third party identity verification services in order to prevent fraud. This allows us to confirm your identity by comparing the information you provide us to public records and other third party databases.
 - (b) We may share your information with companies or other entities that we plan to merge with or be acquired by. Should such a combination occur, we will require that the new combined entity or new owners follow this Privacy Policy with respect to your personal information. You will receive prior notice of any change in applicable policies.
 - (c) We may share your information with any third parties where required to do so by applicable law or any court or other authority to which we are subject in any jurisdiction; or we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of the General Terms and Conditions for ICONOMI End Users and any other applicable policies.
 - (d) We may share your information with other third parties with your consent or direction to do so.

11. HOW YOU CAN ACCESS OR CHANGE YOUR PERSONAL INFORMATION

- 11.1 You are entitled to review, correct, or amend your personal information, or to delete that information where it is inaccurate. You may do this at any time by contacting us at the email address or mailing address listed at the end of this Privacy Policy. This right shall only be limited where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, or where the rights of persons other than you would be violated.
- 11.2 If you close your ICONOMI Account, we will mark your account in our database as "Closed," but will keep your account information in our database for a period of time as determined by applicable law, in particular anti-money laundering laws. This is necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. However, if you close your account, your personal

information will not be used by us for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

12. RIGHTS IN RELATION TO THE USE OF YOUR PERSONAL INFORMATION

12.1 You have the right to:

- (a) **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (e) **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (f) **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness

of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. Such withdrawal does not affect the legality of the operations for the processing of your personal data prior to it.

- 12.2 **No fee usually required.** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 12.3 **What we may need from you.** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 12.4 **Time limit to respond.** We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

13. RETENTION OF PERSONAL INFORMATION

- 13.1 We will retain your personal data for as long as is necessary for the purposes of our business relationship with you, to perform our contractual obligations to you, or if longer, as required for legal and regulatory purposes.
- 13.2 We have established internal policies for the deletion of data from customer accounts following termination of a customer's subscription to the service.

14. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

- 14.1 ICONOMI Limited is based in Malta (which is within the EEA), our service providers may store, transfer, and otherwise process your personal information in countries outside of the country of your residence, including the United States, and possibly other countries. We require that any third party located outside the EEA agree to at least the same level of privacy safeguards as required under applicable data protection laws in the EEA.
- 14.2 If you have a complaint about our privacy practices and our collection, use or disclosure of personal information please contact us at data.protection@iconomi.com.

15. CHILDREN'S PERSONAL INFORMATION

- 15.1 We do not knowingly request to collect personal information from any person under the age of 18. If a user submitting personal information is suspected of being younger than 18 years of age, we will require the user to close his or her

account and will not allow the user to continue using our services. Please notify us if you know of any individuals under the age of 18 using our services so we can take action to prevent access to our services.

16. CHANGES TO THIS PRIVACY POLICY

- 16.1 We may periodically post changes to this Privacy Policy on this page. We encourage you to visit this page often. When required by law, we will notify you of any changes to this Privacy Policy. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our website or mobile applications prior to the change becoming effective.

17. HOW TO CONTACT US

- 17.1 If you have questions or concerns regarding this Privacy Policy, or if you have a complaint, you should first contact us at data.protection@iconomi.com, or on our [support page](#).

18. COMPLAINTS

- 18.1 You can also complain about our processing of your personal information to the relevant data protection authority. You can complain in the EU member state where you live or work, or in the place where the alleged breach of data protection law has taken place. In Malta, the relevant data protection authority is the Information and Data Protection Commissioner, Level 2, Airways House, High Street, Sliema SLM 1549, Malta, (+356) 2328 7100, idpc.info@idpc.org.mt.