



DoubleBet Privacy Policy

Introduction

This Privacy Policy governs the collection, storage and use of personal information collected by us, DoubleBet legal entity ("we", "us", "our" or "DoubleBet"), via our website at <https://doublebet.io> (the "Website"). It provides you (a Buyer, a User or visitor on our Website) with details about the personal information we collect from you, how we use your personal information and your rights to control the personal information we hold about you. This Privacy Policy forms an integral part of the Terms and Conditions. Please read this privacy policy carefully. By accessing or browsing this Website, you confirm that you have read, understood and agree to this privacy policy in its entirety. If you do not agree to this privacy policy in its entirety, you must not use this Website. We may change this Privacy Policy from time to time and you agree that by accessing or using the Website at any time after a change, you will be confirming your acceptance of the new version of the Privacy Policy. We respect your right to privacy and will only process personal information you provide to us in accordance with this privacy policy and applicable privacy laws.

About persons under the age of 18

We do not and will not knowingly collect information from any person under the age of 18. If you are under the age of 18, you may not use this Website unless you have the consent of, and are supervised by a parent or guardian.

What Is Personal Information?

As used in this privacy policy, the term "personal information" means information that specifically identifies an individual or information about an individual that is directly linked to personally identifiable information and can be used to identify that individual. This information you actively provide to us. Personal information does not include "aggregate" information, which is data we collect about the use of this Website or about a group or category of users, from which individual identities or other personal information has been removed. This privacy policy in no way restricts or limits our collection and use of aggregate information.

The personal information we collect about you

When you access and browse this Website (including when you submit personal information to us through data entry fields on the Website), we may collect the following information from you :



- your full name;
- your date of birth and gender;
- your postal address;
- your phone number and e-mail details;
- Ethereum wallet address and address of any other wallet used in relation to the token sale technical information, including the internet protocol (IP) address used to connect your device to the internet, your location, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

You may be prompted to pass an identification check to verify your identity before, during and/or after the token sale.

We reserve the right, at our sole discretion and at any time before, during and/or after the token sale, to collect information that includes your full name, telephone number, BTC, ETH-address(or any other similar address), IP address, residential and email address, browser type, pages accessed on our website, date and time the website was accessed, survey responses and any other information you choose or need to provide.

We also may, at any time before, during and/or after the token sale, demand from you to submit further documents from you, such as a photo of your passport or other identity card, a selfie, utility bill or other documents required by authorities to show proof of your identity as well as documentation that is evidence of your residence. We also may collect information about a User's computer or other access devices for fraud prevention, KYC or AML purposes and other information.

If you fail to fulfill our request or demand to provide the necessary information and documents within a specified timeframe to comply with KYC/AML procedures or laws, we reserve the right to report and in its entirety, forward the information regarding your identity that we have collected and stored to the relevant authorities. Furthermore, we reserve the right to report you to our participating exchanges and enforce a block or ban of your wallet to prevent you from trading until you have provided all the necessary data and documents that confirm your identity to our standard and those of authorities requesting them. We may also request the personal information you provided to enroll in an exchange or marketPEXace to verify your identity or submitted documents.

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.



Cookies

To provide you with a personalized experience and improve the functionality and efficiency of our Website, we may use cookies (and other similar tools, including clear gifs, log files, flash cookies) to collect, store and use information about your visits to the Website.

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

How we may collect, store and use your information

We (or third-party data processors acting on our behalf) may collect, store and use your personal information to provide you with a secure, smooth, efficient, and customized experience.

We may use your personal information to:

- provide the Services and customer support per your request;
- process transactions and send notices about your transactions;
- resolve disputes, collect fees, and troubleshoot problems;
- prevent potentially prohibited or illegal activities, and enforce our Terms and Conditions;
- customize, measure, and improve the Services and the content and layout of our website and applications;
- deliver targeted marketing, service update notices, and promotional offers based on your communication preferences;
- compare information for accuracy and verify it with third parties;
- distribute and account DoubleBet (DBET) tokens;
- Identify our users;
- Administer our Services;
- Personalize our Services for you;
- Send you technical notices and support and administrative messages;



- to make this Website available to you and to provide you with content which is tailored to your individual tastes;
- to complete any purchases, you make through this Website;
- to provide you with any services that you may request;
- where you have given us your consent, to contact you (including by SMS and e-mail) with products and services which we think may interest you;
- where you have given us your consent, to disclose your personal information to carefully chosen or specified third parties so that they may contact you (including by SMS and e-mail) with products and services which they think may interest you.
- Provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of DoubleBet legal entity and others;
- Link or combine information we collect from or about you;
- Verify compliance with the terms and conditions governing the use of our Services.

We will not disclose, sell or rent your personal information to any third party unless you have consented to this or we are required to do so for legal or regulatory purposes. If you do consent but later change your mind, you may contact us sklee@doublebet.io and we will cease any such activity.

However, if a third party acquires all (or substantially all) of our business and/or assets, we may disclose your personal information to that third party relating to the acquisition. We may also disclose your personal information where we are required to do so by applicable law, by a governmental body or by a law enforcement agency.

Also, we may share your personal information with our affiliated entities, subsidiaries and other companies under common control and ownership, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services and communications; service providers that perform work for us (such as hosting providers, identity verification, support, payment, and email service providers); if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of DoubleBet legal entity or others; in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to report suspected illegal activity or to investigate violations of our Terms and Conditions. We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

Finally, we may also collect anonymized details about visitors to our Website for the purposes of aggregate statistics or reporting purposes. However, no single individual will be identifiable from the anonymized details we collect for these purposes.

Use of Data

DoubleBet uses the collected data for various purposes:

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Estonia and choose to provide information to us, please note that we transfer the data, including Personal Data, to Estonia and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

DoubleBet will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure Of Data

Legal Requirements

DoubleBet may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of DoubleBet

- To prevent or investigate possible wrong doing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security Of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics

Google Analytics is a web analytics service.

Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third- party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data,

please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Your account

You can view and edit your personal information at any time in the 'Account' section of the Website.

If you delete your personal information, we will only continue to store your personal information for as long as it is needed to fulfil any purchases or requests made by you.

However, we may retain your personal information after you have closed any account you have with us or stopped using the Website if this is reasonably necessary to comply with our legal obligations, meet regulatory requirements, enforce this privacy policy, resolve disputes between users or to prevent fraud or abuse.

Emails from

is legally required to email you to confirm any purchases that you make on the Website and you cannot unsubscribe from these emails.

You may unsubscribe from any other emails at any time using the 'Unsubscribe' link provided at the bottom of such emails or through the 'Account' section of the Website.

Communicating with other users on the Website

By using or communicating using any public forum that may be available on the Website, such as on groups, forums, communities, chats and sending messages to specific users, you agree and accept that any personal information shared over such public forums may:

- be read, collected and used by other participants on the forum, who may misuse or disclose your personal information, including but not limited to sending unsolicited messages; and
- remain available to other users or the public, including after the deletion of your account.

You are responsible for any personal information that you disclose through any public forum on the Website and agree that DoubleBet legal entity is not responsible or liable if your personal information is misused or disclosed by a third party or a buyer using the Website. If you believe that your personal information is being misused, please contact us immediately at sklee@doublebet.io.

Security

DoubleBet takes appropriate physical, technical and administrative measures to safeguard the personal



information that you provide to us. However, no transmission over the internet can ever be guaranteed secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer over the Internet to us.

Your rights

You have the following rights:

- the right to ask us to provide you with copies of personal information that we hold about you at any time, subject to a fee specified by applicable law;
- the right to ask us to update and correct any out-of-date or incorrect personal information that we hold about you free of charge; and
- the right to opt out of any marketing communications that we (or any third party to whom we have disclosed your personal information with your consent) may send you.

If you wish to exercise any of the above rights, please write to us (either by post or by e-mail) at the address specified above.

International transfers

We may transfer personal information that we collect from you to third party data processors located in other countries or to members of our group of companies relating to the above purposes. Please be aware that other countries may not offer the same level of data protection, although our collection, storage and use of your personal data will continue to be governed by this privacy policy.

Third party websites

This Website may contain links to other Websites operated by sellers, social media websites and other third parties. Please note that this privacy policy applies only to the personal information that we collect through this Website and we cannot be responsible for personal information that third parties may collect, store and use through their Website. You should always read the privacy policy of each Website you visit carefully.

Questions

If you have any questions about how we collect, store and use personal information, or if you have any other privacy-related questions, please contact us by e-mail at sklee@doublebet.io;

We will answer your query within 30 calendar days upon receipt of your query.

Last updated on: 10 January 2019.

