

Privacy Policy

Last updated: August 7, 2018

1. INTRODUCTION

Welcome to the CryptovationX privacy policy.

CryptovationX respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. You can download a pdf version of the policy here: <https://cryptovationx.io/privacy-policy.pdf>.

2. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how CryptovationX collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up for periodic email communications, participate in our Airdrop, purchase online tokens, or otherwise interact with CryptovationX.

Children under 18 years of age are not allowed to use this website, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

CONTROLLER

CryptovationX Inc. is the controller and responsible for your personal data (referred to as "CryptovationX", "we", "us," or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

- a. Full name of legal entity: CryptovationX Inc.
- b. Email address: info@cryptovationx.io
- c. Postal address: Vistra Corporate Services Centre, Wickhams Cay II, Road Town, Tortola, VG1110, British Virgin Islands.

You have the right to make a complaint at any time to the supervisory authority for data protection issues in the country where you live. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on August 3, 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- (a) **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth, and gender.
- (b) **Contact Data** includes postal address, email address, and telephone numbers.
- (c) **Financial Data** includes electronic wallet details, bank account information, and other data used to make purchases from this or other websites.
- (d) **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- (e) **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

- (f) **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- (g) **Usage Data** includes information about how you use our website, products and services.
- (h) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but legally is not considered personal data, as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we are required to collect personal data, whether by law or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. **HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- (a) **Direct interactions.** You may give us your Identity, Contact, and Financial Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
 - i. apply for our products or services;
 - ii. create an account on our website;
 - iii. subscribe to our service or publications;
 - iv. enter a competition, promotion, or survey; or
 - v. give us feedback or contact us.
- (b) **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy <https://cryptovationx.io/cookie-policy> for further details.

(c) **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

- i. Technical Data from the following parties:
 1. analytics providers, such as Google;
 2. advertising networks, such as Google or Facebook; and
 3. search information providers, such as Google or Yahoo.
- ii. Contact, Financial and Transaction Data from providers of technical, payment, and delivery services;
- iii. Identity and Contact Data from data brokers or aggregators such as Oracle Cloud.
- iv. Identity and Contact Data from publicly available sources, such as Companies House, and the Electoral Register based inside the EU.

4. **HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when we have a legitimate lawful basis. Most commonly, we will use your personal data in the following circumstances:

- (a) Where we need to perform the contract we are about to enter into or have entered into with you.
- (b) Where it is our legitimate interest (or those of a third party) and your interests and fundamental rights do not override those interests.
- (c) Where we need to comply with a legal obligation.

We have or may have a lawful basis to process your personal data in the following circumstances:

- (a) “Legitimate Interest” — In the interest of conducting and managing our business to enable us to provide you the products and services, including providing a secure online experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- (b) “Performance of Contract” — In order to enter into or perform a contract with you, or to take steps at your request before entering into such a contract.
- (c) “Comply with Legal Obligation — When necessary for us to comply with a legal obligation, including laws, regulations, rules, whether issued by a national government, a subdivision of a government such as a state or city, or a supra-national government such as the UN or EU.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by

contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing your data
To register you as a new customer	Identity Contact	Performance of contract
To process and deliver your order including: <ul style="list-style-type: none">• Manage payments, fees and charges• Collect and recover money owed to us	Identity Contact Financial Transaction Marketing and Communications	Performance of contract Legitimate interest (to recover debts due to us)

<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey 	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Marketing and Communications</p>	<p>Performance of contract</p> <p>Legal obligation</p> <p>Legitimate interest (to keep our records updated and study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition, or complete a survey</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Usage</p> <p>Marketing and Communications</p>	<p>Performance of contract</p> <p>Legitimate interest (to study how customers use our products/services, develop and improve our products/services, and expand our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)</p>	<p>Identity</p> <p>Contact</p> <p>Technical</p>	<p>Legitimate interest (for running our business, provision of administration and IT services, network security, fraud prevention, and in the context of a business reorganization or group restructuring exercise)</p> <p>Legal obligation</p>

<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>Identity Contact Profile Usage Marketing and Communications Technical</p>	<p>Legitimate interest (to study how customers use our products/services, develop and improve our products/services, develop our business, and inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>Technical Usage</p>	<p>Legitimate interest (to define types of customers for our products and services, update our website, develop our business, and inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>Identity Contact Technical Usage Profile Marketing and Communications</p>	<p>Legitimate interest (to develop our products/services and expand our business)</p>

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established a privacy center where you can view and make certain decisions about your personal data use.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data for marketing purposes, including to form a view on what products, services, and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased [goods or services] from us and you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will not share your personal data with any third party for marketing purposes without your express opt-in consent.

OPTING OUT

You can ask us to stop sending you marketing messages at any time by email us at info@cryptovationx.io to adjust your marketing preferences.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase.

COOKIES

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 this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy <https://cryptovationx.io/cookie-policy>.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table (“Purposes for Which We Will Use Your Personal Data”) above.

- (a) The following internal and external third parties:
 - i. The issuer of CXA tokens.
 - ii. Service providers based who provide IT and system administration services, such as Amazon Web Service.

- iii. Professional advisers including lawyers, bankers, auditors, and insurers based in Thailand and any other countries, who provide advisory, academic, technical, consultancy, accounting, tax, legal, and any other advisor services.
 - iv. Revenue & customs authorities and regulators in the British Virgin Islands.
 - v. Affiliated companies related to CryptovationX business, including partners, subsidiaries, and any other companies.
- (b) Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We may share your personal data within the CryptovationX group of companies. This may involve transferring your data to other jurisdictions, including outside the British Virgin Islands, (or, for our customers inside the European Economic Area (EEA)), jurisdictions outside the EEA.

Many of our external third parties are based in other jurisdictions, including outside the British Virgin Islands, or for customers inside the EEA, outside the EEA, so their processing of your personal data will involve a transfer of data outside the British Virgin Islands and the EEA.

Whenever we transfer your personal data to other jurisdictions, we seek to ensure a similar degree of protection is afforded to it by requiring our third-party partners to enter into contracts requiring them to adhere to the terms of this Privacy Policy.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data to other jurisdictions.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and revenue purposes.

In some circumstances you can ask us to delete your data: see Section 9 (“Your Legal Rights”) below for further information.

In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

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. You also have the right to object where we are processing your personal data for direct marketing purposes. 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:
 - i. If you want us to establish the data's accuracy.
 - ii. Where our use of the data is unlawful but you do not want us to erase it.
 - iii. 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.
 - iv. 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.

If you would like to take advantage of any of your legal rights, please email us at info@cryptovationx.io.

- (a) Request access to your personal data.
- (b) Request correction of your personal data.
- (c) Request erasure of your personal data.
- (d) Object to processing of your personal data.
- (e) Request restriction of processing your personal data.
- (f) Request transfer of your personal data.
- (g) Right to withdraw consent.

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 could refuse to comply with your request in these circumstances.

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.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could 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.