

# PRIVACY POLICY

**Last updated: July 2021**

This Privacy Policy explains how the owner of this site ("Company" "we" or "us"), collects, uses, discloses and protects your personal information. This Privacy Policy explains which information we collect, how we use, process and protect your information and what options our users have with regards to their personal information.

Personal information is any information relating to natural person by which the natural person can be identified, directly or indirectly, in particular a name, an identification number, location data, an online identifier or different identities of that natural person. This policy applies to information we collect when you access or use the Website or the Platform (collectively, "Company's Services") or otherwise interact with us as described below. We are compliant with applicable laws in the countries in which we operate. By using the Company's Services or interacting with us as described below, you confirm that you are aware of this Privacy Policy and that you agree with the collection, use and processing of your personal information in accordance with this Privacy Policy.

We may amend this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy, and by providing an additional notice, including, for example, by adding a statement to the Company's Services or by sending you an email notification. We strongly encourage you to review the Privacy Policy whenever you are made aware of its changes to stay informed about our information practices and your privacy rights and choices.

## **COLLECTION OF INFORMATION**

We collect information you provide directly to us. For example, we collect information about you, when you create an online account, complete a transaction, fill out a form, use our platform, respond to surveys, take part in prize competitions, send messages to us or otherwise communicate with us.

The types of information we may collect are as follows:

- First and last name for individuals or first and last name for representatives of legal entities;
- Permanent and temporary residence address for individuals or registered office and business address for legal entities;
- Contact information, such as your e-mail address and telephone number;
- Date and place of birth;
- Citizenship for individuals or country of registration for legal entities;
- Identification number for individuals or registration number for legal entities;
- Your photo;
- Proof of residency (bank statements, utility bills or similar document for identification purposes);
- Your ethereum address;
- Your IBAN address, if you wish to contribute in FIAT;
- Account information such as username and account preferences;
- Any information that are required for the tax purposes namely your VAT identification number.

- Ethereum address does not in itself allow us to identify an individual person and would as such in certain jurisdictions not be considered personal information. In such jurisdictions, if we do combine this your ethereum address with personal information, the combined information will be treated as personal information for as long as it remains combined.

When you access or use the Company's Services, we automatically collect information as follows:

- **Transaction information:** we collect information about the token generation event and transaction you complete via the Company's Services, including the amount of ethereum funds and FitBeat tokens associated with the token generation event.
- **Device and Log information:** we collect information about the computer or mobile device you use to access the Company's Services, including device identifiers, mobile network information, type of operating system, type of hardware used and the type of browser used. We also log information about your use of the Company's Services, including access times, pages viewed, IP address, other standard web log data, and the page visited before and after navigating to our websites.
- **Cookies and similar tracking technologies:** we use Google Analytics cookies for Company's Services use statistics and may use other cookies, pixel tags, web beacons, and other tracking technologies to collect information about you when you interact with the Company's Services, including information about your browsing behaviour on our Company's Services. For more information on cookies, please see below.

## **USE OF INFORMATION**

Provide the Company's Services and customer support;

- Process and send notices about your token generation event transactions;
- Manage your account(s) and send technical notices, updates, security alerts and support and administrative messages;
- Resolve disputes, troubleshoot problems and help us respond to your customer service requests and support needs;
- Prevent potentially prohibited or illegal activities and enforce our user agreements;
- Personalize, measure and improve the Company's Services;
- Deliver marketing and promotional offers on behalf of the Company and others via e-mail;
- Carry out prize competitions we might organise;
- To help understand your needs and provide you with better service; and
- Carry out any other purpose for which the information was collected, to the extent such purpose is necessarily contemplated by the provision of Company's Services or as otherwise notified in the Company's Services at the time of collection.

You may opt out of receiving promotional communications from us by following the instructions in those communications. You may also opt out of receiving our newsletter or certain administrative emails. If you opt out of receiving promotional communications, we may still send you transactional or relationship messages, such as those about your account or our ongoing business relations.

## **PROCESSING OF INFORMATION**

The Company collects and processes the data described herein itself and does not forward or transfer them to any other entity or person.

By accessing or using the Company's Services or otherwise providing information to us, you consent to the collecting and processing of information as described in this Privacy Policy.

We retain personal information for as long as necessary to fulfil purposes described in this Privacy Policy, subject to our own legal and regulatory obligations. In accordance with our record keeping obligations, we will retain account and personal information for at least 5 years after an account is closed.

## **DISCLOSURE OF INFORMATION**

We will only use and disclose your personal information internally in order to:

- Understand and meet your needs and preferences;
- Develop new and enhance existing service and product offerings;
- Manage and develop our business and operations;
- Carry out any purposes for which we have received your consent; and
- Meet legal and regulatory requirements.

We may disclose any information we collect about you, whether you are a current or former customer, with law enforcement, data protection authorities, government officials, and other authorities, when:

- Compelled by subpoena, court order or other legal procedure;
- We believe the disclosure is necessary to prevent physical harm or financial loss;
- Disclosure is necessary to report suspected illegal activity;
- Disclosure is necessary to investigate violations of this Privacy Policy or our Terms of Use.
- We obtain your consent or at your direction.

Other than, in connection with a merger, sale of Company's assets, financing or acquisition, we will not sell or rent any of your information to third parties for their own marketing purposes.

## **SECURITY**

We implement reasonable security practices and procedures to help protect the confidentiality and security of your information, including any non-public personal information. We protect your information using reasonable physical, technical and administrative security measures, including by limiting access to your information to employees with a need to know such information. To make sure your personal information is secure; we communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within the company.

## **COOKIES**

Cookies are small text files that are placed on your computer by websites you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. They are typically stored on your computer's hard drive.

We use both session and persistent cookies. Session cookies expire when you log out of your account or close your browser. Persistent cookies remain on your computer or mobile device until you erase them or they otherwise expire. Most web browsers are set to accept cookies by default. You are free to decline most of our cookies if your browser or browser add-on permits, but choosing to remove or disable our cookies may interfere with your use and functionality of the Company's Services. Additionally, we may use certain persistent cookies that are not affected by your browser settings, but will use such cookies solely for identity verification and fraud prevention purposes. You may refuse cookies by turning them off in your browser, however, you should be aware that our Website, like most other popular websites, may not work well with cookies disabled. For more information about cookies and how to block, delete or disable them, please refer to your browser instructions, or contact us at [office@fit-beat.io](mailto:office@fit-beat.io).

We use third party service provider(s), to assist us in better understanding the use of our Website. Our service provider(s) will place cookies on the hard drive of your computer and will receive information that we select that will educate us on such things as how visitors navigate around our Website, what products are browsed, and general transaction information. Our service provider(s) analyses this information and provides us with aggregate reports. The information and analysis provided by our service provider(s) will be used to assist us in better understanding our visitors' interests in our Website and how to better serve those interests. The information collected by our service provider(s) may be linked to and combined with information that we collect about you while you are using our services. Our service provider(s) is/are contractually restricted from using information they receive from our Website other than to assist us.

## **ACCOUNT INFORMATION AND ACCESS TO INFORMATION**

You may access and review or update your online account information at any time by logging into your account. If you want to close your account, please contact us at [office@fit-beat.io](mailto:office@fit-beat.io). However, please note that if you close your account, we may retain your information as required by law or for our legitimate business purposes, such as to collect fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud or enforce our user agreements. You have a right to access the information we hold about you. We may ask you to pay a fee before providing you with this information.

## **CONTACT US**

If you have any questions or concerns regarding this Privacy Policy, please contact us at [office@fit-beat.io](mailto:office@fit-beat.io).