

This Privacy Policy has been compiled to better serve those who are concerned with how their personal data is being used by **Kinguin Europe OU** an Estonian company with register code 14379612 (the “**Controller**”).

Your privacy is important to us. This Privacy Policy has been compiled to better serve those who are concerned with how their 'Personally identifiable Information' is being used online. Please read our privacy policy carefully to understand our views and practices regarding your personal data and how we will handle it. By visiting www.kinguin.io (website) you are accepting and consenting to the practices described in this policy.

As data Controller, we determine the means and purposes of processing data in relation to the sale of our tokens. If you have any questions about your personal information or this privacy policy, please direct your questions to gdpr.keou@kinguin.io.

This Privacy Policy explains how we use personal and other types of information we collect from you when you participate in a Kinguin.io platform Initial Coin Offering or visit and/or use kinguin.io (the “Site”) services. This policy does not apply to the practices of companies not owned or controlled by Kinguin or to people whom Kinguin does not employ or manage. If you do not agree with our practices, please do not use our sites or request that your information be deleted by contacting gdpr.keou@kinguin.io.

SECURITY AND PRIVACY ARE OUR PRIORITIES.

We are committed to protecting our customers' personal information and being compliant with all data protection laws including the GDPR (the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). In the course of providing services, we need to collect and maintain certain personal information. This Privacy Policy answers some questions about what personal information we collect and why, what we do with it, and how we protect it.

WHAT TYPES OF PERSONAL INFORMATION DO WE PROCESS?

When you apply for, open, or maintain an account with us, you should be aware that we collect the following types of information:

The information you provide online and on applications or other forms, or through discussions we have with you or your representatives, such as your **name, address, date of birth, country of residence, financial information** such as **credit or debit card, bank account** or other **payment details, block chain identifiers**, such as **block chain addresses and public keys, usernames and passwords** that you create when registering for an account with us, contact information and any information that is provided through your communications with Kingui.io. Some of the information we collect is considered to be sensitive personal data, by accepting the Terms of Service and using Kinguin's services you explicitly consent to the collection of this data. If you do not consent to this collection please contact our data officers at gdpr.keou@kinguin.io and they will comply with any of your requests to delete, edit, or audit your data.

We also collect aggregate and anonymous data that does not identify you specifically, including data collected automatically when you enter our website. This may include **cookies, pixel tags, web beacons, browser analysis tools and web server logs**. This also includes information from the devices you use to access our Site or mobile platform, **your operating system type or mobile device model, browser type, domain, and other system settings**, as well as the **language your system uses and the country and time zone of your device**, among other information. If you would like more information regarding this data please feel free to contact us at gdpr.keou@kinguin.io and we would be more than happy to assist with your questions and requests.

WHY DO WE PROCESS PERSONAL INFORMATION?

We process personal information to meet the needs of our customers and to improve our business purposes for the customers benefit, including:

- to provide the products and services to our customers;
- the day-to-day operation and maintenance of accounts and services;
- to collect the amounts outstanding from our customers;
- to tell our customers about services or other related products and services offered by us;
- to manage our websites and services;
- to understand our customers and their needs;

- to learn about our markets, design and improve our services and related products;
- to administer and process any request for information or job application;
- to comply with our regulatory and legal obligations, including but not limited to warrants, subpoenas and court orders or to meet government tax reporting requirements;
- to contact our customers (including by way of e-mail), including:
 - to respond to our customers inquiries and comments, and to safeguard their interests;
 - to provide our customers with information about our products and services, or those of others, that they may be interested in;
 - to investigate suspicious activities; and
 - to protect our rights and property.

Providing personal data by the customer is voluntary, but the lack of some of them may prevent you from registering on the website, using certain services, receiving a newsletter, buying products etc.

THE PURPOSE, LEGAL BACKGROUNDS AND PERIOD FOR PROCESSING YOUR DATA FOR SPECIFIC PURPOSES ARE AS FOLLOWS:

1. Processing of personal data in order **to perform a contract** on the Kinguin -customer line (these agreements are usually regulations that the customer accepts before using a given service), including providing services to customers, matching the services to the needs of customers, analyzing and improving the services and ensuring the security of the services (hereinafter "performance of the services")- the legal background is art. 6 par. 1 b) GDPR - necessity to perform the contract to which the customer is a party; Personal data will be processed by period: until the termination of the relevant contract between the customer and Kinguin, with the proviso that sometimes, these data can be processed also after the expiration of this contract, but only if it is allowed or required under applicable law e.g. processing for statistical, billing or claims purposes.
2. Processing of personal data in order **to carry out statistical measurements** (hereinafter "statistics"), marketing (including analyzing data for marketing purposes) of the Controller's products and services (hereinafter also "own marketing")- the legal

background is art. 6 par. 1 f) GDPR- the legitimate interest of the Controller. Personal data will be processed until the application of effective opposition.

3. Processing of personal data for the **marketing purposes** (analyzing data for marketing purposes) relating to the products and services of third parties (also referred to as "third parties marketing")- the legal background is art. 6 par. 1 a) GDPR- voluntary consent. Personal data will be processed until withdrawal of consent.
4. Processing of personal data in order to deliver the **newsletter** from Kinguin through customer's account on the website. Newsletter may contain content tailored to customer's interests, based on customer's activity and viewed content. The legal background in case of newsletter is art. 6 par. 1 a) GDPR- voluntary consent. Personal Data will be processed until withdrawal of consent.
5. Processing of personal data in order **to comply with applicable laws** (anti-money laundering obligations & terrorist financing, protecting against the risks of cybercrime, fraud, protecting Kinguin's rights). The legal background is art. 6 par. 1 f) GDPR- the legitimate interest of the Controller. Personal data will be processed by period: until the termination of the relevant contract between the customer and Kinguin, with the proviso that sometimes, these data can be processed also after the expiration of this contract, but only if it is allowed or required under applicable law.

Providing Personal data is voluntary, but failure to provide data marked as necessary to render services to the User will make impossible to provide them.

WHERE DO WE STORE PERSONAL INFORMATION?

We generally store the personal data that we process in electronic databases, some of which may be held on our behalf by third party data storage providers. Sometimes we also keep hard copy records of this personal data in physical storage facilities. We use a range of physical and technical security processes and procedures to protect the confidentiality and security of the information that we hold, and we update these from time to time to address new and emerging security threats that you become aware of.

HOW DO WE PROTECT THE CONFIDENTIALITY AND SECURITY OF PERSONAL INFORMATION?

The information provided by our customers is processed and stored using appropriate security measures in accordance with the requirements set by law. Kinguin secures customer's data against unauthorized access, use or disclosure.

The data is processed in a controlled environment while maintaining high standards of protection.

At the same time, Kinguin draws attention to the fact that customers do not share their registration data with third parties and use the "log out" option after using the content and services offered by the website.

TRANSFER OF PERSONAL DATA

Kinguin, in principle, does not provide customer's personal data to third parties, except for situations in which Kinguin has a legal basis to do so, and at the request of entitled entities, or when it is necessary to perform services offered at the website.

Customer's personal data may be transferred to entities processing personal data on behalf of the Controller, among others:

- administrative, telco, payment, back office, legal service providers, as well as IT service providers, marketing agencies,
- business partners, suppliers and sub-contractors for the performance of any contract the Controller enter into with [them or] customer including any that support our customer identification and anti-fraud controls and customer agree that they may retain and use information about the customer to perform services on Controller's behalf and to improve their services
- analytics and search engine providers that assist us in the improvement and optimization of our site and
- AML/KYC services providers if this is needed to conduct proper clients' onboarding and antimoney laundering checks and processes.

The abovementioned entities process data on the basis of a contract with the Controller and only in accordance with the Controller's instructions.

The Customer's personal data may also be transferred to entities authorized to obtain them on the basis of the applicable law, eg. law enforcement authorities in the event of a request being made by the authority on the appropriate legal basis (eg. for the needs of pending criminal proceedings).

Kinguin is entitled to transfer the customer's personal data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

Customer's personal data may be transferred in certain cases to recipients from third countries, ie. from countries outside the European Economic Area, eg. if it is necessary for the provision of services to the Customer or if it will be conditioned by a different, important legal basis. We may cooperate with government and law enforcement officials or private parties to enforce and comply with applicable laws and regulations. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: to respond to claims, legal process, subpoenas; to protect our intellectual property, rights and safety and the property, rights and safety of a third party or the public in general; and to stop any activity we consider illegal, unethical or legally actionable activity.

YOUR DATA RIGHTS

When you provide data to our site you retain the right to be informed of how your data is used, right of access to your data, right to rectification of your data, right to erasure of your data, right to restrict processing of your data, right to data portability, right to object and right to not be subject to profiling with your data.

1. The right of access to Personal data:

At the customer's request, Kinguin will confirm what personal data of the customer Kinguin processes and provide customer with a copy of such data. In any case, the customer has access to personal data provided to Kinguin through gdpr.keou@kinguin.io.

2. The right to rectify personal data:

In case the customer's personal data is inaccurate or incomplete, the customer may demand from Kinguin correcting or supplementing them. In any case, the customer has the option of correcting customer's personal data through gdpr.keou@kinguin.io.

3. The right to erase personal data (in certain situations):

In certain situations, the customer may claim Kinguin to remove personal data processed by Kinguin (eg. when data is no longer required to provide services by Kinguin).

4. The right to limit the processing of the personal data:

The customer may demand in certain situations that Kinguin temporarily suspend processing of his personal data (e.g. not sending marketing information to the email address provided). For example, a customer may request to restrict the processing of his personal data when he objects to the processing or when he questions the correctness of the data. Despite the restriction of processing, Kinguin will still be entitled to hold personal data.

5. The right to request the transfer of Personal data:

In certain situations (eg. in relation to data processed on the basis of consent), the customer also has the right to receive personal data processed by Kinguin in a structured, commonly used machine-readable format to transfer this data to another Controller.

6. The right to object to the processing of Personal Data:

The customer may demand that Kinguin cease processing his personal data when:

- Kinguin processes customer's personal data based on the legitimate interest of his or her third party, except in situations where these interests are superior to the interests, rights and freedoms of the customer,
- customer's data are processed for direct marketing purposes,
- Processing includes automated decision making towards the customer, including profiling.

7. The right to lodge a complaint with the supervisory body dealing with the protection of personal data:

The customer who is not satisfied with the way Kinguin processes customer persona data shall contact Kinguin at gdpr.keou@kinguin.io and if the answer will not meet customer's expectations, the customer can file a complaint to the appropriate Personal Data Protection Authority in the customer's country of residence.

8. The right to withdraw consent in the scope in which personal data are processed on this basis:

The withdrawal of consent does not affect the lawfulness of the processing of the personal data in the period from the date of consent to the processing personal data until the date of withdrawal of this consent. In order to exercise the above rights, please contact the Controller at gdpr.keou@kinguin.io and our data processing officers will be able to accommodate your requests.

PERIOD OF PERSONAL DATA STORAGE

Kinguin stores customer's personal data only for the time that is necessary to achieve the purposes for which the data was collected. After this time, the data is deleted or anonymized in such a way that it is not possible to establish the identity of the customer.

Personal data may be stored for longer if such an obligation arises from the provisions of law or if it is necessary for Kinguin to defend or seek claims against the customer.

NO USERS UNDER 18 YEARS OF AGE

Our website is not targeted to persons under the age of 18 and we do not intentionally collect and process personal information from persons under the age of 18. Any user that attempts to submit information revealing their age to be under 18 will be blocked and their information deleted.

Contact and Newsletters

If you have given your consent, we may contact you via the address, e-mail and / or phone number you provide on your account for marketing, surveys, news and/or similar initiatives.

Updates to This Policy

We may amend this policy from time to time. The revisions will take effect on the date of publication of the amended policy, as stated. We will notify you through our website or by email of any material changes to the policy. If you do not wish to comply with the updates to this policy, then please do not use our website and services.

Should you have any questions regarding this Privacy Policy please contact gdpr.keou@kinguin.io

INFORMATION ABOUT "COOKIES". COOKIES AND OTHER SIMILAR TECHNOLOGIES

The Platform use mechanisms of automatic data storage-mechanism of the type: "cookies". They are used to better adapt the Platform to the needs of Users. For purposes of this policy, mechanisms for automatic data storage will be referred to as "Cookies".

"Cookies" are files saved on the User's end device, used to identify the User's browser while using the Platform. They are used to provide the Controller statistical information about Users 'traffic, Users' activity and the manner of using the Platform and its services. They allow Kinguin to adjust the content and services to the User's preferences.

Most "cookie" files are so-called session cookies that are automatically deleted from the hard disk after the session ends (that is, after logging out or closing the browser window). Some of the "cookies" allow the identification of the end device of the User when visiting the Platform again - they are not deleted automatically, they are saved on the end device.

In the case of mobile devices, as in the case of stationary devices, the mechanism of accepting "cookies" has been used, which allows memorizing information related to a given User.

Kinguin informs that third parties, including those not affiliated with Kinguin, in order to display advertisements on the Platform, may place their "cookie" files in the browsers of the Users.

The Platform also use a third party service, thanks to which Kinguin obtains anonymised reports on the use of the Platform and the effectiveness of marketing campaigns. A User who does not agree to such a way to monitor his behaviour should express his opposition on the website of such an entity.

We use cookies and other similar technologies for the purposes of:

- providing services;
- adapting the content of the Platform to the User's preferences and optimizing the use of the Platform; e.g. cookies allow in particular to identify the User's device and properly display the Platform adapted to its individual needs;
- creating statistics that help to understand how Users use the Platform, which allows improving its structure and content;
- maintaining the User's session (after logging in), thanks to which the User does not have to re-enter their login and password on each subpage of the Platform;
- advertising presentation, including in a way that takes into account the interests of the User or his place of residence (individualising the advertising message) and with the

guarantee of excluding the possibility of repeatedly presenting the same advertisement to the User;

- surveys - in particular to avoid multiple presentations of the same questionnaire to the same Recipient and to present surveys in a way that takes into account the interests of the recipients.

What types of cookies do we use?

Due to the lifetime of cookies, we use two types of files:

- sessional - temporary files stored on the User's end device until logging out, leaving the website and application or turning off the software (web browser);
- fixed - stored on the User's end device for the time specified in the cookie file parameters or until they are deleted by the User.

Due to the purpose of cookies:

- necessary for the operation of the Platform - enabling the use of our services, e.g. authentication cookies used for services requiring authentication;
- files used to ensure security, e.g. used to detect fraud in the field of authentication,
- performance - allowing gathering information about the way the User uses the Platform;
- functional - allowing "remembering" the settings selected by the User and personalizing the User's interface, eg. in terms of the language or region of the User's origin, size of the font, appearance of the website, etc .;
- advertising - allowing to provide Users with advertising content more tailored to their interests;
- statistical - used to count statistics on the Platform.

HOW TO MANAGE BROWSER SETTINGS?

In many cases, software used for browsing websites (web browser) allows for the storage of information in the form of cookies and other similar technologies by default in the User's end device.

However, the User can change these settings at any time.

Failure to change means that the above information can be posted and stored on its end device, and thus that we will store information on the User's end device and access this information.

From the level of the web browser used by the User, for example, you can manage cookies manually. The most popular browsers include possibility:

- accepting cookies, which allows the User to fully use the options offered by websites;
- cookie files management at the level of individual sites selected by the User;
- defining settings for various types of Cookies, for example accepting files as permanent as session, etc.;
- blocking or deleting Cookies.

Comprehensive information is available in the software (web browser) settings. Details for using particular browsers, m.in .:

- Internet Explorer
- Mozilla Firefox
- Chrome
- Opera
- Etc.

Please be advised that restrictions or exclusions of the use of cookies and other similar technologies may affect some of the functionalities available on the Platform.

Additional information about cookies and other technologies can be found, among others at youronlinechoices.com or in the Help section in the browser menu.