

KINGUIN.IO PRIVACY POLICY

Last updated [07-03, 2018]

INTRODUCTION

Kinguin Limited (“we” or “us” or “our”) respects the privacy of our users (“user” or “you”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website kinguin.io (the “Site”, or “Website”). Please read this privacy policy carefully, and to its full extent. If you do not agree with the terms of this privacy policy, please do not access the site.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Site after the date such revised Privacy Policy is posted.

COLLECTION OF YOUR INFORMATION

We may collect information about you in a variety of ways. The information we may collect on the Site includes:

Personal Data

Personal information is collected only when voluntarily offered and solely for purposes that are clearly identified on the Site. Personal information will be gathered to fulfill our legal and regulatory responsibilities (AML and KYC), and beyond that, the absolute minimum needed for us to provide our products or services. Personal information means any information that is unique to you, such as your:

Name

Username

Password

E-mail address

Cryptocurrency address

Mailing address

Other personal information you choose to provide

By providing us with your personal information, you also consent for us to collect, hold, use and disclose your personal information in accordance with this Privacy Policy. In addition to providing the foregoing information, if you choose to correspond further with us through e-mail or through the “contact us” section of the Site, we may retain, use and disclose the content of your messages together with your e-mail address and our responses.

Derivative Data

When you use our Website or services available on our Website, we automatically collect information from your devices. We collect the following information:

Server Log Information We collect server log information when you use our Website, which may include (but is not limited to) your login details, the date and time of visits, the pages viewed, your IP address, time spent at our Website and the websites you visit

just before and just after our Website.

Device Information We collect information about the computer or mobile device you use to access our Website, including the hardware model, operating system and version, the web browser you use, and other device identifiers.

Telemetry Information If you use any of our open source software, we may collect bandwidth upload and download speeds, the amount of free and used storage space on your device and other statistics about your device.

Usage Information If you use our Website, we will collect metadata about the files you upload for storage and we will record instances in which you have used your private key to authenticate communications.

Information Collected by Cookies and Other Tracking Technologies We and our service providers use various technologies to collect information when you interact with our Website, including cookies and web beacons. Cookies are small data files that are stored on your device when you visit a website, which enable us to collect information about your device identifiers, IP address, web browsers used to access the Website, pages or features viewed, time spent on pages, mobile app performance and links clicked. Web beacons are graphic images that are placed on a website or in an email that is used to monitor the behaviour of the user visiting the website or sending the email. They are often used in combination with cookies.

USE OF YOUR INFORMATION

The information collected about you via the Site, will exclusively be used to:

- Providing, maintaining, delivering or improving the Site or the products or

services provided through the Site.

- Compile anonymous statistical data and analysis for use internally or with third parties.
- Analyzing and tracking data to determine the usefulness or popularity of certain content and to better understand the online activity of the Site users.
- Fulfilling our legal or regulatory requirements, among others in terms of AML regulation, and KYC responsibilities.
- Email you regarding your account or order.
- Sending you technical notices, support or administrative notifications.
- Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
- Process payments and refunds.
- Solicit support for the Site
- Or any other purpose or reason clearly stated when collecting the information.

DISCLOSURE OF YOUR INFORMATION

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

By Law or to Protect Rights

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

Third-Party Service Providers

We may share your information with third parties that perform services for us or on our behalf, including, but not limited to, payment processing, data analysis, email delivery, and hosting services.

Affiliates

We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

Sale or Bankruptcy

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline honor commitments we made in this Privacy Policy.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

Consent

We may share your information with others for other reasons than otherwise mentioned, but only with your explicit consent, or at your instruction.

STORAGE OF YOUR INFORMATION

The data that we collect from you will be transferred to, and stored at, a destination inside the European Economic Area ("EEA"). It will be processed by staff operating

outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfillment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any web-based payment transactions will be encrypted using SSL technology.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

THIRD-PARTY WEBSITES

The Site may contain links to third-party websites and applications of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the Site, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Site.

SECURITY OF YOUR INFORMATION

We use administrative, technical, and physical security measures to help protect your personal information. We have furthermore taken steps to establish “Privacy by Design”, and have made efforts to limit the possibility of a security breach. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

We commit ourselves to notify our users of any security breach within 72 hours of becoming aware of such a breach, in a reasonable manner. Please note, that certain breaches may limit our ability to contact you directly, or to make sure such a notification reaches you. As such, we cannot guarantee that a notification of a security breach will reach you.

Any breach that can't reasonably be expected for us to be able to prevent, we will consider as Force Majeure, meaning we would not be liable for any losses caused by such a breach, to the maximum extent permissible by law.

USER RIGHTS

Any user of the site has access to the following rights, as they are defined in the General Data Protection Regulation (Regulation 2016/769):

- The right to be forgotten,
- the right of rectification,
- the right of access, and
- the right to withdraw your consent to us holding your information.

Should you wish to utilize any of your above mentioned user rights, please contact us at general@kinguin.io, or through the “contact us” function on the Site.

POLICY FOR CHILDREN

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data we have collected from children under age 13, please contact us using the contact information provided below.

CONTACT US

If you have questions or comments about this Privacy Policy, please contact us at general@kinguin.io