

PRIVACY POLICY

CRYPTOWARS OU

28/02/2019

1. WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy applies to the personal data that We at Cryptowars OU collect and process acknowledging and understanding that Your privacy is important to You and that You care about how Your personal data is collected and processed. This document is unaliable part of Cryptowars General Terms and Conditions of CW Tokens Sale.

We are Cryptowars OU and We are a company incorporated in the Estonia with registration number 14616880, having it's legal address at Harju maakond, Tallinn, Kesklinna linnaosa, Narva mnt 7-634, 10117. We are also registered with the Politsei- ja Piirivalveamet for provision a virtual currency wallet service and for provision services of exchanging a virtual currency against a fiat currency.

We at Cryptowars OU are dedicated to safeguarding and preserving Your personal data and privacy when visiting Our Websites, utilising Our services, products or communicating electronically with Us (“collectively referred to as “the Services”).

For the purposes of the data protection laws that apply to us, including the GDPR which is the European General Data Protection Regulation and Estonian Data Protection Law, We act as the Data Controller for the personal data that We collect and process to enable You to make use of Our Services.

The purpose of this Privacy Policy is to transparently provide You with an explanation as to the legal basis for Us collecting and processing Your personal data, the categories of personal data that We may collect about you, what happens to the personal data that We may collect, where We process Your personal data, how long We are required to retain Your personal data, who We may share Your personal data with and to also explain Your rights as a data subject.

We do update this Privacy Policy from time to time and will post all updates to Our Website as and when issued. Please do review this policy regularly on Our Website for any changes.

2. DEFINITIONS AND INTERPRETATIONS

In this Privacy Policy the following terms shall have the following meanings:

“Cookie” means a small text file placed on Your computer or device by Our Websites or mobile applications when You visit certain parts of Websites and/or when You use certain features of Our mobile applications.

“GDPR” means the General Data Protection Regulation (EU) 2016/679, of the European Parliament and of the Council of 27 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, as amended, replaced or superseded and in force from time to time and as transposed into member-state legislation.

“Privacy Policy” means this Privacy Policy updated from time to time and made public on Our Websites and through Our mobile applications.

“Personal Data” means any information which relates to an identified or identifiable natural person. An identifiable person is one who can be identified directly or indirectly in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“You” (“your”) refers to You when You are visiting Our Websites, utilising Our services, products or communicating electronically with us.

“We” (“us” or “our”) refers to Cryptowars OU.

3. YOUR DATA PROTECTION RIGHTS

Under the GDPR you, as a data subject, have certain rights over the personal data that We hold and process.

At Cryptowars OU, We are committed to make it easy for You to exercise these rights in the most transparent manner possible. You can exercise any of Your rights in relation to the data that Cryptowars OU holds about you, by contacting Our data protection officer through the email address provided at the end of this section or through Your personal user cabinet on Your mobile device via the personal data management and protection applications We support.

The following are the specific rights You have over Your personal data We hold and process, namely:

- 1) **The right to be informed** about Our collection and processing of Your personal data including without limitation the legal basis for the collection and processing, the categories of data, the methods of data use, the envisaged period for which the personal data will be retained. This Privacy Policy should tell You everything You need to know, but You can always contact Us to find out more or to ask any questions.

- 2) **The right to access** Your personal data We collect about you, commonly referred to as “**Subject Access Requests**”, which provides you, as the data subject, the right to obtain a copy of Your personal data that We are processing for You

Pursuant to GDPR We are required to respond without undue delay to all Subject Access Requests in practice this means We have to respond within 1 month of receipt of the Subject Access Request.

Ordinarily Subject Access Requests are free of charge.

We may extend the time period for responding to a Subject Access Request by a further two months and may charge a reasonable fee if We deem the request to be manifestly unfounded or excessive, however, We are required to advise You of Our intention to do this within 1 month of Your subject access request.

Should You wish to make a Subject Access Request this can be done by contacting the Company using the contact details in Section 9.

- 3) **The right to have Your personal data rectified** if any of Your personal data that We collect and process is in any way inaccurate or incomplete.

- 4) **The right of erasure (otherwise known as “the right to be forgotten”)**, i.e. the right to ask Us to delete or otherwise dispose of any of Your personal data that We process. Please note that this is not an absolute right and We may not

be able to comply with Your request as We may be legally obliged to continue to retain Your personal data for a specific period

- 5) **The right to restrict** (i.e. prevent) the processing of Your personal data by us.
- 6) **The right to object** to Us processing Your personal data for a particular purpose or purposes. Please note that the right to object only applies in certain circumstances and will depend on the purposes or legal basis for the processing.
- 7) **The right to data portability.** This only applies where You have provided personal data to Us directly, the legal basis for Us processing Your personal data is i) consent or ii) for the performance of a contract and We are processing Your data using automated means. In such instances You have the right to receive Your personal data (or request that We transfer it to another Controller) in a structured, commonly used and machine readable format.
- 8) **Rights relating to automated decision-making and profiling.** We do not use Your personal data in this way.
- 9) **The right to lodge a complaint** with any relevant Data Protection Authority, in particular in the member State of Your residence, place of work or the place of processing Your personal data.

If You wish to exercise any of the aforementioned rights, , We request that in the first instance You contact Our data protection officer at any time Our on contact@cryptowars-ou.com.

We promise to promptly consider Your request and to respond to You in accordance with the requirements of the Estonian Data Protection Act and GDPR.

Complaints to the Estonian Data Protection Inspectorate should be made by using the appropriate forms provided in the Estonian Data Protection Inspectorate Website.

<https://www.aki.ee/et/inspektsioon/poordu-inspektsiooni-pole>

4. PERSONAL DATA WE COLLECT ABOUT YOU

4.1 LEGAL BASIS FOR COLLECTING AND PROCESSING PERSONAL DATA

Cryptowars OU is licensed with the Politsei- ja Piirivalveamet with licence numbers FRK000542 and FVR000633 and by law all licensed entities are obliged to establish an Anti-Money Laundering/Countering of Financing of Terrorism framework for the purpose of forestalling, preventing and detecting illegal activities such as money laundering and financing of terrorism (**the AML/CFT framework**).

Pursuant to the AML/CFT framework, Cryptowars OU is legally obliged to:-

- i) obtain basic personal data about all players (information such as full name, residential address and date of birth) to enable it to identify all players; and
- ii) undertake ongoing monitoring of a player's activity and transactions to determine the ongoing potential risk of money laundering or financing of terrorism.

As part of the AML/CFT framework during Your lifecycle as a player You may also be requested to provide additional personal data to enable Us to verify Your identity (information such as Government issued ID card or passport, Driving Licence etc.).

Cryptowars OU will also process Your personal data based on other legal bases such as:-

- i) the performance of Our contract with You (i.e. the provision of Our Services to you);
- ii) our legitimate business interests (i.e. for fraud prevention, maintaining the security of Our network and services, seeking to improve the Services that We provide and Your interaction with us). Whenever We rely upon on this lawful basis We assess Our business interests to make

sure that they do not override Your rights. Furthermore, in some cases You have the right to object to this processing;

- iii) with Your consent .for direct marketing purposes so that We may keep You fully up to date with other products and services that We supply and think may be of interest to you. Where We rely upon consent, We will need Your explicit consent, which may be removed at any time.

4.2 CATEGORIES OF THE PERSONAL DATA WE COLLECT

A summary of the Personal Data that We process, when We collect it, how We use it and why We use it (i.e. the legal basis for processing) is listed below:-

| Personal Data | When We collect | How We use | Why We use |
|-------------------------------------|---------------------------|---|--|
| login, password | In registration procedure | We use Your personal and contact information to register You as a User and identify You in Our Services. Login and password You can use to log in | Necessary for the performance of a contract with you |
| information about the permitted age | In registration procedure | We need to make sure that Your use of Our services is legal | Necessary to comply with a legal obligation |
| email | In registration procedure | Use email to restore Your account. We use it to notify You about changes to Our Terms or Privacy Policy; to communicate with you. | Necessary for the performance of a contract with you |
| | | We use Your e-mail address to inform You about the latest updates of Our Services and other products You may like. If You have subscribed to Our newsletter, We may send You marketing communications and information that will | Only with Your explicit consent |

| | | | |
|--|-----------------------------|--|--|
| | | create an excellent customer experience | |
| phone number | In registration procedure | We use this information to reset Your password | Necessary for the performance of a contract with you |
| address of the cryptocurrency wallet | In registration procedure | We use this to enable Us to undertake transactions between ourselves and you | Necessary for the performance of a contract with you |
| name, surname, patronymic, residential address | In registration procedure | We use Your personal data as part of Our due diligence / KYC procedure on Our “Know Your Customer” KYC portals and to identify You in Our Services | Necessary to comply with a legal obligation |
| Passport ID | KYC | We need to make sure that Your use of Our services is legal. We have to check whether You are permitted user of Our services subject to applicable legislation | Necessary to comply with a legal obligation |
| Your location, include: IP address, time zone, from which You access Our app or Website, Country | KYC | | |
| copies of “proof of identity” and “proof of residence” documents | KYC | Data may be requested additionally during the KYC procedure if the minimum data is insufficient or when You make a payment of 10 000 € or over | Necessary to comply with a legal obligation |
| data on the use of Our services, links, transactions | When You use Our services | We use it to improve Your customer experience and provide bespoke services that satisfy Your needs and preferences | Necessary for Our legitimate interests |
| Information about Your transactions (crypto wallet, | When You do the transaction | We use it for make transactions. All transactions are carried out using third- | Necessary for the performance of a contract with you |

| | | | |
|--|---------------------------|--|---|
| balance, Blockchain transaction details and user wallet data) | | party services | |
| unique identifiers, browser type and settings, device type and settings, operating system, mobile network information. We also collect information about the interaction of Your browsers and devices with Our services, including OS, IP address, URL of Your request | When You use Our services | We use it to optimise Our service and to improve Our app, Website, games, services, direct marketing, player relationships, behaviour profiling and experiences | Necessary for Our legitimate interests |
| All personal data | When You use Our services | We will use all of Your personal data to carry out Our ongoing monitoring process for the purposes of identifying and dealing with potential money laundering, financing of terrorism and fraudulent activities. This is also necessary to assist in making Your transactions secure, enable Us to protect Your digital assets. | Necessary to comply with a legal obligation |

5. PROTECTING YOUR PERSONAL DATA AND DATA RETENTION

We use, store and process Your personal data on Cryptowars OU servers which are located on Google Cloud Platform.

By filling a “consent application“ You agree to this conditions of collection, processing, transfer and storing Your personal data. When We process Your personal data for one of the legal bases specified in this Privacy Policy, We will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Policy.

Cryptowars OU protect Your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards Cryptowars OU use are firewalls and data encryption, physical access controls to Our data centers, and information access authorization controls. Cryptowars OU also authorize access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities. The Cryptowars OU’s staff is trained on procedures for the management of personal information, including limitations on the release of information. Access to personal information is limited to those members of Our staff and contractors whose work requires such access. Cryptowars OU conducts periodic reviews to ensure that proper information management policies and procedures are understood and followed. All of Our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations.

5.1. HOW WE PROTECT YOUR DATA

When You provide Your personal data through Our Website, KYC portals, Our applications, this information is transmitted across the internet securely using industry standard encryption. Your personal data will be held encrypted on secure servers.

Where any third parties process Your personal data on Our behalf, We require that they have appropriate technical and organizational measures in place to protect this personal data and We will also ensure that a GDPR compliant. Data Processing Agreement is in place between Cryptowars OU and the third party so that both parties understand their responsibilities and liabilities pursuant to GDPR.

5.2. HOW YOU CAN PROTECT YOUR PERSONAL DATA

When You create Your account, choose a strong password that is unique to this account. Do not share Your password with other people. Using the same password across Your different accounts will increase the risk of Your data being compromised if Your password is accidentally or unlawfully accessed by unauthorized persons. If You suspect that someone else has got access to Your password, make sure that You change it immediately. When using Our wallets, ensure You keep Your passphrases and keys in a secure device isolated from devices You use regularly. Do not share the device containing Your passphrases and keys with friends, family members or even people You trust.

5.3. DATA RETENTION

Your personal data will be retained for as long as necessary to satisfy the purposes We received it for, this includes regulatory and business purposes.

In determining the necessary personal data retention period, the following factors are considered:

- The amount of personal data as We aim to minimize this amount to the extent possible for each specific purpose specified in Section 4.1 of this Privacy Policy.
- The nature of the personal data depending on the exact purpose which this specific personal data serves as detailed in Section 4.1 of this Privacy Policy.
- The sensitivity of the personal data by its nature and substance.
- The potential risk of harm from unauthorized use or disclosure of Your personal data and We continue to run risk assessments and risk mitigation activities to minimize this potential risk including engagement of third party specialized data management and data protection providers.
- The purposes for which We process Your personal data and whether We can achieve those purposes through other means, and the applicable legal requirements.

6. THIRD PARTY LINKS

You may find links to third party Websites on Our Website or chats of users contained on Our Website or mobile applications. These Websites should have their own privacy policies which You should check. We do not accept any responsibility or liability for their policies whatsoever as We have no control over them.

7. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We do not share Your Personal Data to third Parties, except cases that are mentioned in this Privacy Policy.

7.1. WITH YOUR CONSENT

We will share information with companies, organizations or individuals outside of Cryptowars OU when We have Your explicit consent.

7.2. TO COMPLY WITH THE LAW

We may share information in response to a request for information if We believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process or governmental request, including, but not limited to, meeting national security or law enforcement requirements. To the extent the law allows it, We will attempt to provide You with prior notice before disclosing Your information in response to such a request.

7.3. IN AN EMERGENCY

We may share information if We believe that it's necessary to protect the vital interests of the data subject (i.e. to prevent imminent serious physical harm or death to a person.)

7.4. TO ENFORCE OUR POLICIES AND RIGHTS

We may share information if We believe Your actions are inconsistent with Our user agreements, rules, or other Cryptowars OU policies, or to protect the rights, property, and safety of ourselves and others.

7.5. WITH OUR AFFILIATES

We may share information between and among Cryptowars OU and any of Our parents, affiliates, subsidiaries, and other companies under common control and ownership.

7.6. WITH OUR PARTNERS

We may share information with vendors, consultants, and other service providers (but not with advertisers and ad partners) who need access to such information to carry out processing activities for us. The partner's use of personal data will be subject to appropriate confidentiality and security measures.

We engage service providers to perform functions and provide services to us. For example, We use third-party services for KYC procedure. We may share Your private personal data with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use Your private personal data only on Our behalf and pursuant to Our instructions.

Where any third parties process Your personal data on Our behalf, We require that they have appropriate technical and organizational measures in place to protect this personal data and We will also ensure that a GDPR compliant .Data Processing Agreement is in place between Cryptowars OU and the third party so that both parties understand their responsibilities and liabilities pursuant to GDPR.

7.7 INTERNATIONAL TRANSFERS OF PERSONAL DATA

GDPR applies to controllers and processors located in the European Economic Area ("the EEA) and countries that the EU has deemed to provide adequate protection to data subjects from a data protection perspective. Estonia is a country in EU and it has been recognised by the EU as being an "adequate" country from a data protection perspective.

Data Subjects risk losing the protection of GDPR if personal data is transferred outside of i) the EEA or ii) countries holding adequacy status and accordingly GDPR restricts such transfers, unless the rights of data subjects in respect of their personal data is protected by appropriate safeguards or one of a limited number of exceptions applies (such exceptions include Your explicit and informed consent).

Cryptowars OU will not make any international transfers of Your personal data to countries outside the EEA (or a country holding adequacy status) unless it has i) Your explicit and informed consent or ii) it has put in place the appropriate safeguards or iii) the international transfer is covered by an exception.

7.8 ADVERTISING, ANALYTICS AND BUSINESS PARTNERS (LIMITED TO NON-PERSONALLY IDENTIFIABLE INFORMATION)

We may share aggregated or pseudonymous information (including demographic information) with partners, such as publishers, advertisers, measurement analytics, apps, or other companies. For example, We may tell an advertiser how its ads performed or report how many people installed an app after seeing a promotion. We do not share information that personally identifies You (personally identifiable information is information like name or email address) with these partners, such as publishers, advertisers, measurement analytics, apps, or other companies.

7.9 OTHER INFORMATION

Other information, that does not personally identify You as an individual is collected by Cryptowars OU (such as, by way of example, patterns of use) and is exclusively owned by Cryptowars OU. We can use this information in such manner that Cryptowars OU, in its sole discretion, deems appropriate.

We may share specific aggregated, non-personal information with third parties, such as the number of users who have registered with us, the volume and pattern of traffic to and within the site, etc. That information will not identify you, the individual, in any way.

We shall not use Your email or other contact information for sending of commercial proposal, other marketing needs, without Your prior consent.

In the light of the above, when You send Us messages, We can keep them for administering of Your inquiries, for improving of Our services. We shall not transfer information from such messages to third parties.

8. USE OF COOKIES

To enhance the quality of Our services, provide You with relevant content as well as understanding how You use Our Website and game applications, We use technologies, such as Cookies. Cookies do not typically contain any information that personally identifies you, but personal information that We store about You may be linked to the information stored in and obtained from Cookies.

We use Cookies to learn about Your traffic patterns and Website usage to help Us develop the design and layout of the Website in order to enhance Your experience

browsing Our Website and applications. You can delete Cookies if You wish; while certain Cookies are necessary for viewing and navigating on Our Website or app, most of the features will be still accessible without Cookies.

8.1. WHAT COOKIES DO WE USE AND HOW WE CAN USE THEM?

Strictly Necessary Cookies - these are required for the operation of Our Website. They include User session key. This is a temporary key issued to the User after the successful logging in. This cookies are used to enable You to log into secure areas of Our Website. It is stored, by default, in the browser history on the User's personal device. However, if due to the browser settings, this storage is unavailable, We will use Cookies to store this information.

Functionality – cookies that are used to recognise You and remember Your settings when You return to Our Website, so that We can provide you with a more personalised experience.

8.2. HOW DO YOU CHANGE COOKIE PREFERENCES OR BLOCK COOKIES?

If You want to delete any cookies already stored on Your personal device or stop the cookies, You can do so by deleting Your existing cookies and/or altering Your browser's privacy settings. However, if, as mentioned above, due to Your personal device settings or browser settings, We are not able to use other technical solutions to store respective information, restriction/deletion of cookies may lead to your inability to access the content of Our Website.

9. CONTACTING US

We welcome any queries, comments or requests You may have regarding this Privacy Policy. If You wish to make a subject access request

Please do not hesitate to contact Us at

Address: Estonia, Tallinn, Kesklinna linnaosa, Narva mnt 7-634, 10117

E-mail: contact@cryptowars-ou.com

10. CHANGES TO THIS PRIVACY POLICY

Any changes that We make to Our Privacy Policy in the future will be posted on Our app and Website.

Where appropriate, We will notify You of the changes when You next visit Our Website.

This Privacy Policy was last updated on 28th of February 2019.

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