

# Token Sale Privacy Policy

## Introduction

This Privacy Policy outlines Carats.io ("**we**", "**our**" or "**the Company**") practices with respect to information collected from users who access our website at [www.carats.io](http://www.carats.io) ("**Site**"), register or participate in our token sale (collectively: "**Users**").

This Privacy Policy is a part of the Terms of Use and is incorporated therein by reference.

We encourage Users to carefully read the Privacy Policy and use it to make informed decisions.

In this Privacy Policy you can read about:

- **What type of information** we collect
- **How we receive** Users' information
- **Cookies**
- **How we use** and **with whom we share** the information
- **User rights**
- **For how long we retain** the information
- **How we safeguard** the information
- How to **contact us**

## What Information we collect?

We collect two types of data and information from Users who register or participate in the token sale.

The first type of information is un-identified and non-identifiable information pertaining to a User(s), which may be made available or gathered via your use of the Site (“**Non-personal Information**”), even if you do not participate or register to the token sale. We are not aware of the identity of a User from which the Non-personal Information was collected. Non-personal Information which is being collected may include technical information transmitted by your device, including certain software and hardware information (e.g. the operating system your device uses, language preference, access time, etc.) in order to enhance the functionality of our Site. We may also collect information on your activity on the Site (e.g. pages viewed, online browsing, clicks, actions, etc.).

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“**Personal Information**”). Such information includes:

- **Registration information:** When you register to participate in our token sale, you will be asked to provide us certain details such as: full name; e-mail or physical address, and other information, as further described in our Terms of Use/registration form.
  - **Registering through social network account:** When you register or sign-in to the Services via your social network account (e.g., Facebook, Google+), we will have access to basic information from your social network account, such as your full name, home address, email address, birthdate, profile picture, friends list, personal description, as well as any other information you made publicly available on such account or agreed to share with us. At all times, we will abide by the terms, conditions and restrictions of the social network platform.
- **Device Information:** We may also collect Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Site.
- **Payment Information:** In order for you to participate in the token sale, you may be required to share personal information within the Site or with our trusted payment processor. Such personal information may include your name, billing address, identity number, financial information (e.g. your credit card number, bank account, etc.) and any other information which is required in order to complete your participation.

## How is the information used? With whom do we share the information?

We do not rent, sell, or share Users' information with third parties except as described in this Privacy Policy.

### **We may use the information for the following:**

- Setting up accounts/ providing services
- Conducting the token sale;
- Verifying your identity and determining your eligibility to participate in the token sale;
- Support - communicating with you, sending you notices regarding the token sale, providing you with technical information and responding to any customer service issue you may have;
- To communicate with you and to keep you informed of our latest updates and services;
- Advertising/ marketing and direct marketing;
- Conducting statistical and analytical purposes, intended to improve the Site.

In addition to the different uses listed above, we may transfer or disclose Personal Information to our subsidiaries, affiliated companies and subcontractors.

In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our trusted third party providers, who may be located in different jurisdictions across the world, for any of the following purposes:

- Advertising;
- Direct marketing;
- Performing research, technical diagnostics or analytics;
- KYC approvals;
- Data storage and process;

We may also disclose information if we have good faith to believe that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies (including our Agreement), including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v)

prevent harm to the rights, property or safety of us, our users, yourself or any third party; or (vi) for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights.

## User Rights

You may request to:

- a. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information.
- b. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
- c. Request rectification of your personal information that is in our control.
- d. Request erasure of your personal information.
- e. Object to the processing of personal information by us.
- f. Request to restrict processing of your personal information by us.
- g. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

If you wish to exercise any of the aforementioned rights, or receive more information, please contact us at [contact@carats.io](mailto:contact@carats.io)

## Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Under applicable regulations, we will keep records containing client personal data, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

## Cookies

When you use our Site, we may store cookies on your computer (as well as other tracking technologies like web beacons and pixels) in order to facilitate and customize your use of our Site. A cookie is a small data text file, which a website stores on your computer's hard drive (if your web browser permits) that can later be retrieved to identify you to us. Our cookies may store information regarding your registration to the token sale and Account information. You are always free to decline our cookies if your browser permits, but such disabling may cause some of the features of our Site to not operate properly and your online experience may be limited.

We also use a tool called "Google Analytics" to collect information about your use of the Site. Google Analytics collects information such as how often users access the Site, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Site and services. Google Analytics collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics [Terms of Use](#) and the [Google Privacy Policy](#).

## Third party collection of information

Our policy only addresses the use and disclosure of information we collect from you. To the extent you disclose your information to other parties or sites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them. Accordingly, we encourage you to read the terms and conditions and privacy policy of each third party that you choose to disclose information to.

This Privacy Policy does not apply to the practices of companies that we do not own or control, or to individuals whom we do not employ or manage, including any of the third parties which we may disclose information as set forth in this Privacy Policy.

## How do we safeguard your information?

We take great care in implementing and maintaining the security of the Site and your information. We employ industry standard procedures and policies to ensure the safety of the information we collect and retain, and prevent unauthorized use of any such information, and we require any third party to comply with similar security requirements, in accordance with this Privacy Policy. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Site, and we make no warranty, express, implied or otherwise, that we will prevent such access.

## Transfer of data outside the EEA

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

## Corporate transaction

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

## Minors

We forbid users under the age of 18 to register or participate in the token sale. In the event that we become aware that a user under the age of 18 has shared any information, we will discard such information. If have any reason to believe that a child under 18 has shared any information with us, please contact us at [contact@carats.io](mailto:contact@carats.io)

## Updates or amendments to this Privacy Policy

We reserve the right to periodically amend or revise the Privacy Policy; material changes will be effective immediately upon the display of the revised Privacy policy. The last revision will

be reflected in the "Last modified" section. Your continued use of the Platform, following the notification of such amendments on our website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

## How to contact us

If you have any general questions about the Site or the information we collect about you and how we use it, you can contact us at [contact@carats.io](mailto:contact@carats.io)

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