

## **PRIVACY POLICY**

### **1. General**

- 1.1. COTI Exchange (Gibraltar) Limited of Royal Ocean Plaza, 42 Ocean Village Avenue, Ocean Village, Gibraltar (the “**Company**”, “**we**,” or “**our**,”) are fully committed to protecting your privacy and your information (personal-identifying Information and general non-personal activity log information, being the “**Information**”).
- 1.2. We have created this Privacy Policy to let you know what Information we (or others on our behalf) collect from you when you access and/or use our website located at www.ccx.io (the “**Website**”), how this Information is collected and how is it used.
- 1.3. This Privacy Policy is part of and should be read in conjunction with our Terms of Use and Token Purchase Agreement. When you access or use the Website, you agree that we (or others on our behalf) may collect, use and disclose the Information in accordance with the terms of this Privacy Policy.

### **2. Collection of Information**

- 2.1 When you visit or use the Website and in your communications with us, we (or others on our behalf, including but not limited to our affiliates) may collect two types of the Information:
  - (a) “Personally identifiable information” that you voluntarily disclose and which is collected on an individual basis, including but not limited to, user name, password, name, company name, email address, billing address and credit card information;
  - (b) General “non-personal” activity log information unique to you, including but not limited to:
    - (i) Server Log Information 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 on the Website and the websites you visit just before and just after visiting the Website.
    - (ii) Device Information about the computer or mobile device you use to access the Website, including the hardware model, operating system and version, the web browser you use, and other device identifiers.
    - (iii) Telemetry Information if you use any of our open source software, including bandwidth upload and download speeds, the amount of free and used storage space on your device and other device statistics.
    - (iv) Usage Information, metadata about the files you upload for storage, recordings of instances in which you have used your private key to authenticate communications.
- 2.2 By providing us with your “personally identifiable 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” section of our Website we may retain, use and disclose the content of your messages together with your e-mail address and our responses.

### **3. Data Storage**

- 3.1 We may use third party vendors and hosting partners to provide the necessary hardware, software, networking, storage and related technology required to run the Website.

#### **4. Use of Information**

- 4.1 We may use the Information for purposes of, including but not limited to: (i) providing, maintaining, delivering or improving the Website, products or services provided through the Website; (ii) analyzing and tracking data to determine the usefulness or popularity of certain content and to better understand the online activity of the Website users; (iii) fulfilling our legal or regulatory requirements; (iv) providing you with the information or products or services that you have requested; (v) responding to your inquiries or to other communication received from you; (vi) developing new products or services; (vii) sending and communicating with you about news, products, services, events and other information we think will be of interest to you; (viii) monitoring and analyzing trends, usage and activities in connection with the Website; (ix) detecting, investigating and preventing fraudulent transactions or unauthorized or illegal activities; (x) protecting the rights and property of the Company and/or others; (xi) linking, connecting or combining Information we collect from or about you with other information; and (xii) carrying out any other purpose or reason for which the Information was collected.

#### **5. Google AdWords**

- 5.1 The Website may use the Google AdWords remarketing service to advertise on third party websites (including, but without limiting, Google) to previous visitors to the Website; it could mean that we advertise to previous visitors who haven't completed a task on the Website. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network for example). Third party vendors, including Google, use cookies to serve ads based on someone's past visits to the Website. You understand that any data collected will be used in accordance with the provisions of the Privacy Policy and Google's privacy policy, respectively.
- 5.2 You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of interest-based advertising entirely by cookie settings, permanently using a browser plugin or by any other way available subject to the relevant frameworks you are using in this regard.

#### **6. Sharing of Information**

- 6.1 We may share your Information to any third parties, provided that the Information is shared: (i) upon your consent or instruction; (ii) to our current or future parent companies, affiliates, subsidiaries and/or with other companies under common control or ownership with us or our offices internationally; (iii) to third parties or service providers that perform work for us; (iv) in the event that we sell, assign or transfer some or all of our business or assets to a successor or acquirer, or if we are acquired by or merge with a third party, or if we file for bankruptcy or become insolvent, or any other situation where Information may be sold, assigned or transferred to a successor or acquirer; (v) in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process; (vi) if we believe your actions are inconsistent with any of our agreements and/or policies, or to protect the rights, property and safety of any of our parties or others; (vii) in the

event that a data center is compromised by a third party and/or is faced with a security breach; and (viii) to third parties where aggregate Information is disclosed which cannot be reasonably used to identify you.

- 6.2 We may disclose the Information if required to do so by law, or if we believe in good faith that such action is necessary to comply with applicable regulation, a current judicial proceeding, a court order or legal process, or to protect and defend our rights or property, your personal safety or that of the public. We reserve the right to share the aforesaid Information with banks, credit card companies, and appropriate institutions, if we determine in our sole discretion that it is required in order to comply with applicable regulation or if we suspect you of committing any fraudulent activity (including of fraudulent payment), or any other prohibited transaction.
- 6.3 We may transfer the Information outside the jurisdiction which you are a resident of and store it in other jurisdictions and countries; the data protection and other laws of these jurisdictions or countries may not be as comprehensive as those in the jurisdiction which you are resident – in these instances we will take steps to ensure that an appropriate level of protection is given to your Information.
- 6.4 Any person who provides the Information to us (or to others on our behalf) in connection with the Website represents to us that they are 18 (eighteen) years of age (or such other lawful age – where higher than 18) or older. It is our policy to try and uncover attempts by minors to access the Website, and this may require having to access and verify your Information. We will not accept and take actions to remove from our records any Information which we discover is or was submitted by a minor.
- 6.5 We may share Information with identity-check providers and/or initiate submitting inquiries to data aggregators (such as watch-list checks providers), to maintain that our internal procedures are in compliance with applicable regulation.
- 6.6 We will retain the Information only for as long as necessary for the fulfillment of the purposes for which such Information is collected.

## **7. Social Sharing Features**

- 7.1 The Website may offer social sharing features, links to social media and other integrated tools. Your use of such features enables the sharing of information with the social network operator, your contacts and/or the public, depending on the settings you use with the entity that provides the social sharing feature or social media. Please visit the privacy policies of the entities that provide these features to obtain more information about the purpose and scope of data collection and the processing of such data by such entities.

## **8. Choice / Opt-Out**

- 8.1 By agreeing to this Privacy Policy, you hereby allow us to provide you with communications from us, as well as from third parties, either in connection with the Website or in connection with other (including, but not limited to, commercial offers and promotions that we think may be of interest) matters and offers. You hereby acknowledge and consent to the sending of such communications, and will not argue that such activity amounts to sending of unsolicited communications. You also hereby acknowledge that we are not responsible for the communication sent to you by third parties or for their content and method of distribution.

- 8.2 You may opt-out from receiving communications from us by sending a blank e-mail to us with the word “Remove” to [contact@ccx.io](mailto:contact@ccx.io) and/or by clicking on the unsubscribe link available in our e-mails sent to you.

## **9. Cookies**

- 9.1 We (or others on our behalf) use various technologies to collect information when you interact with our Website, including cookies and web beacons. Cookies, which are small text files that are placed on your computer or equipment when you visit certain online pages, track your activities, record your preferences, and make the Website more responsive to your needs by delivering a better and more personalized experience to you. The cookies are stored on your computer and/or other equipment and are used by us to help track your clicks and pass information as you go through the Website and can allow us to associate navigational information from browsing visits with Information you provide via the Website. Since cookies allow you to more easily navigate web sites, you may prefer to leave them turned on. Web beacons are graphic images that are placed on the Website or in an email that is used to monitor your behavior while visiting the Website or sending the email and are often used in combination with cookies.
- 9.2 If you are accessing the internet through an alternative method such as a mobile application you understand that you may not have the ability to disable cookies, depending on the specific access method.

## **10. Security**

- 10.1. We have implemented suitable security policies, rules and technical measures to protect and safeguard the Information under our control from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss. All our employees and data processors that have access to, and are associated with the processing of your Information, are obliged to respect the confidentiality of your Information. On the Website, when your Information is transferred, we use various means and methods to ensure that your Information is transferred securely over the internet.

## **11. Links to Other Sites**

- 11.1. The Website may contain links to other sites. Other sites may also reference or link to the Website. We are not responsible for the privacy practices or the content of such other online sites, and any information collected by these third party online sites is not governed by this Privacy Policy, and we assume no responsibility or liability whatsoever for the policies (including privacy policies), practices, actions or omissions of such third party sites.

## **12. Disclaimer**

- 12.1. The Website operated “as is” and “as available” without liability of any kind. We are not responsible for events beyond our direct control. We cannot guarantee nor do we represent that there will be error-free performance regarding the privacy of your Information, and we will not be liable for any direct, indirect, incidental, consequential or punitive damages relating to the use or release of the Information.

## **13. Jurisdictions**

13.1. We make no representation that the Website operates (or is legally permitted to operate) in all geographic areas or that the Website, or information, services or products offered through the Website are appropriate or available for use in other locations. Accessing the Website from territories where the Website or any content or functionality of the Website or portion thereof is illegal is expressly prohibited. If you choose to access the Website, you agree and acknowledge that you do so, on your own initiative and at your own risk and that you are solely responsible for compliance with all applicable laws.

#### **14. Changes to the Privacy Policy**

14.1. We may change this Privacy Policy in our sole discretion at any time. Any revisions to this Privacy Policy will be posted as an updated version accessible via the Website home page. We recommend that you revisit this Privacy Policy regularly so as to be kept apprised of any such changes. Your continued use of the Website, services or any other features, technologies or functionalities offered by us constitutes your agreement to be bound by any such changes to this Privacy Policy. If you do not agree with this Privacy Policy do not use the Website.

#### **15. Miscellaneous**

15.1. For any queries relating to this Privacy Policy and data protection please contact us at (contact@ccx.io) or via the communication details appearing in the footer section of the Website.

*Last updated: December 1, 2017.*