



## PRIVACY POLICY

Last updated: 28 August 2018

### 1. GENERAL INFORMATION

- 1.1 This privacy policy ("**Privacy Policy**") sets out our commitment to your privacy and the basis which we may collect, use, disclose or otherwise process your personal data.
- 1.2 This Privacy Policy will apply to all the Services offered by us, excluding Services which may have separate privacy policies and which do not incorporate this Privacy Policy.
- 1.3 Please read this Privacy Policy carefully. If you have any queries or feedback concerning this Privacy Policy, you may contact our Data Protection Officer at the email address set out at Section 14 below.

### 2. DEFINITIONS

In this Privacy Policy, unless the context otherwise requires, the following definitions shall apply:

**"Data Protection Legislation"** means the Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore and any other applicable data protection laws in the relevant jurisdictions.

**"personal data"** means data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which the organisation has or is likely to have access.

**"Section"** means a section in this Privacy Policy.

**"Services"** means our apps, platform, services, events (including the Token Sale) and Websites.

**"Token Sale"** means the token sale organised by us in respect of the tokens proposed to be issued and sold by us, as described on <https://ico.entrade.io>.

**"we", "us" and "our"** refer to Entrade IO Pte. Ltd. (Company Registration No. 201828499K), a company incorporated in Singapore with its registered address at 150 Beach Road #35-00 Gateway West Singapore 189720, or its group companies, as appropriate.

**"Websites"** means <https://ico.entrade.io> and other websites operated or provided by us from time to time.

### 3. PERSONAL DATA WHICH WE COLLECT

- 3.1 Examples of personal data which we may collect include an individual's name, address, email address, phone number, gender, birth date, online identifier (such as username), device unique identity, operating system or version, hardware information, date and time spent on the Services and financial information (such as credit card numbers, bank account information and digital or crypto wallet address).
- 3.2 We collect personal data about you in a number of different ways. For example:

- (a) to improve and maintain any of the Websites or Services, we may gather anonymous analytics and statistical information from you, which include but are not limited to the number of daily users, operating system version, device make and model and coarse location;
- (b) to facilitate your participation in the Token Sale, we may collect your personal particulars such as your email address and digital or crypto wallet address;
- (c) for system administration and to improve the Websites and our apps, we may require information such as IP address, operating system and browser type;
- (d) to understand your browsing actions and patterns, we may collect statistical data about our users' browsing actions and patterns, without identifying any individual;
- (e) we may ask you for information when you report a problem with any Website or our apps;
- (f) we may send you marketing and promotional materials on our latest Services or those of carefully selected third parties, so long as you consent to it;
- (g) if you contact us, we may keep a record of that correspondence; and
- (h) if you complete any survey, we may store and use that data for research purposes, which may include details of visits to our website such as traffic data and location.

#### 4. **CONSENT**

4.1 We generally do not collect your personal data unless:

- (a) it is provided to us voluntarily by you or via a third party who has been duly authorised by you (your "**authorised representative**") to disclose your personal data to us after (i) you or your authorised representative have been notified of the purposes for which the data is collected, and (ii) you or your authorised representative have provided written consent to the collect and usage of your personal data for those purposes; or
- (b) the collection and use of personal data without consent is permitted or required under the Data Protection Legislation.

4.2 By using or subscribing for any of the Services, or submitting any information to us, you agree that we may collect, use, disclose or otherwise process your personal data in accordance with this Privacy Policy. If you do not agree to this Privacy Policy, please do not subscribe for, or use, any of the Services.

4.3 You are deemed to have given your consent for the collection, use, disclosure and processing of your personal data in accordance with this Privacy Policy in the following circumstances:

- (a) when you voluntarily provide your personal data to us;
- (b) when you are aware of the purpose for which you provide your personal data to us;
- (c) it is reasonable for you to have provided your personal data to us in the circumstances; and
- (d) in any other circumstances where consent is deemed under the Data Protection Legislation.

## 5. THE INFORMATION YOU PROVIDE

- 5.1 We generally rely on personal data provided by you and, if applicable, your authorised representative.
- 5.2 You represent and warrant that the personal data and information which you provide or otherwise disclose to us are accurate and complete.
- 5.3 If you provide us with any personal data or information relating to a third party, you represent and warrant that (i) such personal data or information is accurate and complete; (ii) you have obtained the consent of the said third party to the collection, use, disclosure and processing of such third party's personal data or information on the terms set forth in this Privacy Policy, and (iii) you are duly authorised by the third party to provide us with such third party's personal data or information.

## 6. PURPOSES OF COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

- 6.1 The purposes for the collection, use, disclosure or otherwise processing of personal data (as the case may) depend on the nature of the Services which you use or subscribe to.
- 6.2 We may collect and use your personal data for one or more of the following purposes:
- (a) performing obligations in the course of or in connection with our provision of the Services requested by you;
  - (b) verifying your identity;
  - (c) restricting attempts to use the Services from a restricted territory and attempts to use the Services in breach of the applicable terms of service;
  - (d) facilitating certain events that we organise such as the Token Sale;
  - (e) managing your subscription for the relevant Services, including creating and managing your accounts, providing you with the relevant Services and developing, improving and maintaining such Services;
  - (f) responding to, handling, and processing queries, requests, applications, complaints and feedback from you;
  - (g) managing your relationship with us;
  - (h) processing payment or credit transactions;
  - (i) conducting investigations or internal audits or taking action, including in relation to any violation of terms and conditions for the Services;
  - (j) complying with any applicable laws, regulations, codes of practice, guidelines or rules or to assist in law enforcement and investigations conducted by any governmental or regulatory authority;
  - (k) any other purposes for which you have provided the information;
  - (l) transmitting to any third parties (including, for example, our third party service providers and agents and relevant governmental and regulatory authorities, whether in Singapore or elsewhere) for the aforementioned purposes; and
  - (m) any other purposes which are necessary, ancillary or consequential to the above.

6.3 We may disclose your personal data:

- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the Services requested by you; or
- (b) to any third party service providers, agents and other organisations we have engaged to perform any of the functions listed in Section 6.2 above for us.

Except as otherwise provided for in this Privacy Policy or such other agreement entered between you and us, we will not share your personal data with other parties without your consent, unless required by law.

6.4 The purposes listed above may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

## 7. **LIMITATIONS TO COLLECTION, USE OR DISCLOSURE OF PERSONAL DATA**

7.1 We will only collect, use, disclose or process your personal data to the extent necessary for the purposes described under this Privacy Policy and to the extent allowed under the Data Protection Legislation.

7.2 The consent that you provide for the collection, use, disclose and processing of your personal data shall remain valid until it is withdrawn by you in writing. If you wish to withdraw your consent, please note the following:

- (a) You may withdraw your consent at any time by (i) using the privacy settings available in your profile settings available on our Website or (ii) if such privacy settings are unavailable on the relevant Website, by submitting your request to our Data Protection Officer at the email address set out at Section 14 below.
- (b) Upon receipt of your request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) to process your request and for us to notify you of the consequences of acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within 14 calendar days of receiving the same.
- (c) The withdrawal of your consent may however result in certain consequences. Depending on the nature and scope of your request, in certain cases, we may not be able to provide you with certain Services.
- (d) Please note that withdrawal of your consent does not affect our right to continue to collect, use, disclose and process personal data where such collection, use, disclosure and processing without consent is permitted or required under the applicable laws.

## 8. **ACCESS TO AND CORRECTION OF PERSONAL DATA**

8.1 If you wish to make:

- (a) an access request for a copy of your personal data which we hold or information about the ways in which we use or disclose your personal data; or
- (b) a correction request to correct or update any of your personal data which we hold,

please contact our Data Protection Officer at the email address set out in Section 14 below.

8.2 Please give us a reasonable period of time to respond to any request and effect any change. We may ask to verify your identity and for more information about your request. Where we are legally permitted to do so, we may also refuse your request with or without providing you with any reasons for doing so.

8.3 Where you have made an access request, we may charge a reasonable administrative fee to cover the costs of responding to such request. If we decide to do so, we will provide you with a written estimate of such fee before processing such request.

## 9. PROTECTION OF PERSONAL DATA

9.1 We shall take reasonable steps to secure and protect your personal data and information by implementing measures to secure and protect your personal data as required to comply with the Personal Data Legislation, including:

- (a) reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to personal data; and
- (b) security precautions safeguarding all electronic storage and transmission of personal data.

9.2 While we strive to use commercially acceptable means to protect your personal data, please note that no method of transmission over the Internet or method of electronic storage is completely secure and we cannot ensure absolutely the security of any personal data or information which you transmit to us.

9.3 To the fullest extent permitted by the law, we shall not be liable in any manner for any losses arising from any unauthorised collection, use, disclosure or otherwise processing of personal data or information. We shall not be held responsible for the acts, omissions, data policies or use of cookies by any third party, or the content or security of any third party websites (even if linked to our website). Any such liability is expressly disclaimed and excluded to the fullest extent permitted under the law.

## 10. RETENTION OF PERSONAL DATA

10.1 We shall retain personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by the applicable laws.

10.2 We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

## 11. TRANSFER OF PERSONAL DATA OUTSIDE OF SINGAPORE

11.1 We shall only transfer personal data outside Singapore in accordance with the Data Protection Legislation.

11.2 Due to the nature of the Services provided by us, you agree, acknowledge and consent that your personal data (and such other personal data which you provide to us) may be stored or processed in any country where we have operations (including but not limited to Singapore, Germany, the UK, the US and Indonesia) or where we engage service providers. We may transfer personal data outside Singapore to countries which may have data protection rules that are different from those of Singapore. However, we shall take measures to ensure that any such transfers comply with the Data Protection Legislation, and such personal data remains protected to the standards described in this Privacy Policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access the personal data.

12. **THIRD PARTY SITES**

Our Services may, from time to time, contain links to external sites or resources which are operated by third parties. We have no control over the content and privacy practices of such sites or resources. You should review the privacy policies of these sites and resources operated by third parties and understand how your information may be used by those third parties.

13. **CHANGES TO THIS PRIVACY POLICY**

13.1 We may amend this Privacy Policy at any time with or without notice to you.

13.2 Any amendment to the Privacy Policy shall become binding as of the moment the amended Privacy Policy is posted on the relevant Websites. You may determine if any such amendment has taken place by referring to the date on which this Privacy Policy was last updated.

13.3 To the fullest extent permitted by the law, by continuing to access or use the Services after the amended Privacy Policy is posted on the relevant Websites, you agree to be bound by the amended Privacy Policy.

14. **QUESTIONS OR CONCERNS**

14.1 If you have any questions or concerns relating to your personal data or this Privacy Policy, please send us a message with sufficient detail to our Data Protection Officer at [dpo@entrade.io](mailto:dpo@entrade.io). We will make every effort to resolve your concerns.