

## **Privacy Policy**

*Date of Last Revision: 23 October 2017*

This Privacy Policy governs the processing (obtaining, recording, holding, disclosing etc.) by **VLBToken OÜ**, a company registered in the Republic of Estonia with the registration no. 14123367 (hereinafter “**VLB**”, “**we**”, “**us**”, “**our**”), of information collected from users (hereinafter “**User**”, “**you**”, “**your**” or “**yours**”) of the <https://vlb.io> website (hereinafter “**Website**”), VLB services or any other features, technologies or functionalities offered by VLB on the Website or through any VLB mobile applications and other online services offered by VLB (collectively, “**Services**”) that link to or reference this Privacy Policy. By using the Website and/or Services, you signal your acceptance to this Privacy Policy. If you do not agree to this Privacy Policy, please do not use our Website. Your continued use of the Website following the posting of changes to this policy will be deemed as your acceptance of those changes.

The security of your personal data is important to us. VLB has safeguards in place to protect the personal data stored with us. This policy describes how we may collect, use, disclose, process and manage your personal data.

Our Website may contain links to other websites which are not maintained by VLB. This Privacy Policy only applies to the information collected by us through our websites and/or Services and does not apply to third party websites and services that you may access through these links. When visiting these third-party websites, you should read their privacy policies, which will apply to your use of these websites.

### **Information We May Collect**

#### **1. Personal identification information you provide to us:**

- 1.1. We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our Website, register on the Website, fill out a form, and in connection with other activities, services, features or resources we make available on our Website.
- 1.2. We collect and process information you provide directly to us when you use our Services. For example, the types of personal information we may collect from you when you visit or use our online services include your name, e-mail address, mailing address, social security number, telephone number(s), account number(s), user name and password. You may choose to provide other information to us.
- 1.3. We will collect personal identification information from Users only if they passively or voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Website related activities. Thus, in some cases, we will be unable to render services to you if you do not provide us personal identification information due to the requirements of anti-money laundering laws and other legal acts.

#### **2. Information we collect automatically**

- 2.1. We may collect non-personal identification information about Users whenever they interact with our Website or Services. This may include, but is not limited to:
  - Log information - we collect log information about your use of the online services, including the type of browser you use, access times, pages viewed, your IP-address and the page you visited before navigating to our online services;

- Device information - we collect information about the computer or mobile device you use to access our online services, including the hardware model, operating system and version, unique device identifiers and mobile network information;
  - Location information - we may collect information about the location of your device each time you access or use one of our mobile applications or otherwise consent to the collection of this information;
  - Information collected from cookies – we or our third-party partners may use cookies (as well as web beacons or other technologies) to collect and store this and other information about your visit to, or use of, our online services. You may set up your web browser to block cookies from monitoring your Website visit.
3. Information we collect from other sources
- 3.1. We may also collect information about you from additional online and offline sources including commercially available third-party sources. We may combine this information with the personal and other information we have collected about you under this Privacy Policy.

### **How We Use the Collected Information**

We may use your personal information for the following purposes, based on Art 6(2) of the Personal Data Protection Act of Estonia:

- To provide, maintain and improve customer services;
- To carry out Know-Your-Customer and Anti-Money Laundering checks and to comply with and enforce other obligations arising from applicable laws and regulations, relevant industry standards, contractual obligations and our policies;
- To analyse your account activity in order to provide you with an adequate and reliable service;
- To offer you the best possible options suitable for your needs.

Furthermore, by accepting this Privacy Policy, you will consent to us using your personal information for the following purposes, from which you are free to withdraw your consent at any time:

- Communicate information to you at the request of our partners;
- Manage our risks;
- Market our products or services, including special offers, promotions, contests or entitlements that may be of interest to you;
- Carry out any other purpose for which the information was collected.

We may also use data that we collect on an aggregate or de-identified basis for various business purposes, where permissible under the applicable laws and regulations.

We will ask the User's separate consent before using the collected information for purposes that are not listed herein.

We store the collected information for as long as it is necessary to provide Services to you. We generally store information on your transactions for five years. The information associated with your account will be kept until your account is deleted, unless we no longer need the data to provide Services.

### **Disclosing Your Information**

We will not sell or trade your information unless we provide you with advance notice. We may share information about you as follows:

- With current and future VLB partners, affiliates, subsidiaries and other companies under common control and ownership in the course of delivering our Services to you;
- With affiliates, consultants, and other service providers when we believe it will enhance the Services and products we can provide to you, or for legal and routine business reasons, so long as those parties agree to keep this information confidential;
- We may also release information when its release is appropriate to comply with the law, enforce our Website policies, or protect our or others' rights, property or safety. This does not include website hosting partners and other parties who assist us in operating our Website, conducting our business, or serving our users;
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

### **Security and Storage of Information**

We adopt appropriate data collection, storage and processing practices and security measures to protect from unauthorised access, alteration, disclosure or destruction of your personal information, user credentials, transaction information, and data stored on our Website. As soon as we receive your private information, we implement reasonable security measures and procedures to avoid unauthorised access from any third party. However, transmission of such data over the Internet using personal computers or mobile devices is not completely safe and, therefore, we cannot guarantee absolute security of all information submitted to our platform. Any transmission of such information and documents is at your own risk.

The information that we collect from you may be transferred to and stored at a destination outside the European Economic Area, in particular where counterparties to any of the service offered through our Website are based outside of the European Economic Area. Your information may also be processed by staff operating outside of the European Economic Area who works for us or for one of our suppliers. By submitting information to us, you agree to such transfer, storing or processing. Any such transfers made will be in full compliance with all aspects of the Estonian Personal Data Protection Act.

### **Children Under the Age of 16**

VLB Services are not intended or directed at individuals under the age of 16. Therefore, individuals under the age of 16 may not create an account or otherwise access or use the Services.

### **Your Choices**

The choices we may give you in regard to the sharing of information with our partners, affiliates and third parties, will be described in the privacy policies or notices you receive in connection with the products or services you obtain from us.

We may provide you with tools and settings that allow you to access, correct, delete and modify information associated with your account.

You may also remove cookies stored from your computer or mobile device. However, if you do block cookies, you may not be able to use certain features and functions of our web Websites.

## **Changes to the Privacy Policy**

We may amend this policy from time to time to ensure that this policy is consistent with any developments to the way VLB uses your personal data, or any changes to the laws and regulations applicable to VLB. If we do, we will let you know by appropriate means, such as by posting the revised policy on our Website with a new “Last Updated” date. All changes will become effective when posted unless indicated otherwise.

## **Contact us**

We provide Users with access to their personal identification information. Users may update or delete such information at any time on their own discretion. We will not keep outdated or deleted information, unless we have to do so for legitimate business purposes or in accordance with legislative or regulatory requirements.

According to the Estonian Personal Data Protection Act, you have the right to request a copy of your information that we hold. Please submit a written application at [support@vlb.io](mailto:support@vlb.io). If any of your information that we hold is incorrect, you can change it by contacting us at [support@vlb.io](mailto:support@vlb.io).

If you have a concern about the way we handle your personal information, you have a right to lodge a complaint or turn to court. For more information on the process please visit the webWebsite of the Estonian Data Protection Inspectorate at <http://www.aki.ee/en/what-can-people-demand-regarding-their-data>.

With any other questions or concerns about this Privacy Policy, you are encouraged to contact us at [support@vlb.io](mailto:support@vlb.io)

## **Cookie Policy**

A cookie is a very small text document or piece of code, which often includes an anonymous unique identifier. When you visit a website or use a mobile application, a computer asks your computer or mobile device for permission to store this file (or similar technologies such as web beacons) on your computer or mobile device and access information from it. Information gathered through cookies or similar technologies may include the date and time of visits and how you are using the website.

Cookies are used by us as part of this Website. Our Website also uses third party cookies for analytics.

By continuing to use our Website you are deemed to consent to our use of the cookies described in this Cookie Policy. If you do not consent to us using cookies then please read the next section.

## **Blocking Our Use of Cookies**

You can block the use of cookies by activating the relevant settings in your browser.

### **What Happens When You Block Cookies**

In order to use some parts of our Website, your web browser will need to accept cookies. If you choose to withhold consent, or subsequently block cookies, some aspects of the Website may not work properly and you may not be able to access all or part of the Website.

### **What We do With Cookies**

We use session cookies to allow the Website to uniquely identify your browsing session on the Website, which allows us to coordinate this information with data from the Website server. Such cookies are stored temporarily during a browsing session and are deleted from the user's device when the browser is closed.

We also use persistent cookies that may be saved on your computer for a fixed period and are not deleted when the browser is closed where we need to know who you are for more than one browsing session. For example, we use this type of cookie to store your preferences, so that they are remembered for the next visit, or to keep you logged in if you navigate away.

We may also use cookies where they are essential for the operation of the Website, for example to remember that you are signed in to the Website during your session.

We use "analytics" cookies. These, along with other information, allow us to calculate the aggregate number of people using the Website and which features of the Website are most popular.

We use this information to improve the Website. We do not generally store any personal data that may be provided to us in a cookie.

We use the following types of cookies or similar technologies:

1. Google Analytics (Third Party Cookie) - These cookies enable us to store information such as the time you visit our Website, whether you have visited before and the Website that you visited prior to visiting our Website. For more information about Google Analytics please see: <http://www.google.com/intl/en/analytics/privacyoverview.html>.
2. Twitter, Slack, Telegram and LinkedIn buttons - These cookies enable users to like or share items in social pages. For more information see respective page privacy policy.
3. Track URL - This cookie informs us which webpage you visited immediately before coming to our Website. It does not collect any personal data or send personal data any third party.