

**Please read the following carefully to understand our practices regarding the processing of Your personal data and Your rights related thereto.**

**We do not knowingly collect personal data from children under 18 years of age. If You are under 18 years old, please do not provide any personal data to us.**

## **DRAGONGLASS TOKEN SALE PRIVACY POLICY**

Dragonglass OÜ, a private limited liability company, incorporated at Uus-Tatari 16-14, Tallinn, 10134, Estonia, European Union (**we, us** or the “**Company**”) is committed to protecting and respecting Your privacy.

This policy (the “**Privacy Policy**”) together with the Terms of Sale of Dragonglass Token Purchase Agreement and any other documents referred to herein sets out the basis on which any personal data we collect from You or that You provide to us in course of the Dragonglass Token Sale will be processed by us.

In course of the Dragonglass Token Sale, as defined in the Terms of Sale of Dragonglass Token Purchase Agreement, (the “**Token Sale**”), we naturally collect information from or about You or Your devices, such as Your name, IP address, information for identity verification purposes in accordance with applicable law and information about Your use of the Service (as defined in the Dragonglass Token Purchase Agreement).

By visiting <https://www.dragonglass.com> (hereinafter the “**Website**”) You are accepting and consenting to the practices described in this Privacy Policy.

The Company acts as the data controller in terms of Your personal data processed in connection with the Token Sale.

### **1. PERSONAL DATA WE PROCESS**

We process Your personal data collected from You as well as from third persons. If You do not provide us with any personal data requested, You may not be able to create an account on our Website or purchase or dispose of the Dragonglass Tokens.

#### **1.1 Personal data You provide to us**

This includes any personal data that You give us upon registering to use the Website, by filling in forms on the Website or by corresponding with us by phone, e-mail or otherwise. It also includes information You provide when You participate in discussion boards or other social media functions on the Website, enter a competition, promotion or survey, participate in any Token Sale and when You report a problem with our service. The information You provide us with may include:

- Your full name (name and surname);
- e-mail address;
- Ethereum wallet/public address;
- Nationality/Country;
- ID card (front and back) or passport photo;
- Your photo (headshot live or recent);
- check box „I have read and agree to the Terms and Conditions of Token Sale“;
- check box „I have read and agree to the Privacy Policy“;
- any content and metadata relating to Your communication with us;
- and any other personal data You provide to us in course of any activities listed above.

## **1.2 Personal data we collect via Your visits on the Website**

With regard to each of Your visits to our Website we will automatically collect the following personal data on You by way of placing cookies (please refer to Section 3 below):

- technical information, including the Internet protocol (IP) address used to connect Your computer to the Internet;
- Your login information (if applicable);
- Your browser type and version, time zone setting, browser plug-in types and versions;
- Your operating system and platform information;
- information about Your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the Website (including date and time),
- information You viewed or searched for on the Website, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page; and
- any information related to Your communications with our customer service team (e.g. phone number).

## **1.3 Personal data we receive from other sources**

We are sometimes required to compare the personal data You provide to us with third party databases in order to verify accuracy of such data and confirm Your identity to comply with relevant anti-money laundering (AML) and know-your-customer (KYC) laws and regulations. For

such purpose we make an inquiry to respective databases on your name and personal ID number.

## **2. PURPOSES OF PROCESSING YOUR PERSONAL DATA**

We collect and further process Your personal data set out in Section 1 above only for the purpose of performing our obligations to You under the Terms of Sale of the Dragonglass Token Purchase Agreement as well as our statutory obligations in connection with organizing the Token Sale. More specifically, Your personal data is processed for the following purposes:

- 2.1 to enable You to create an account on the Website and for us to identify You as the account holder;
- 2.2 to verify Your compliance with the Terms of Sale of Dragonglass Token Purchase Agreement and allow You to purchase Dragonglass Tokens (as defined in the Dragonglass Token Purchase Agreement);
- 2.3 to enable us keep track of our interactions with You;
- 2.4 to send You technical notices, support and administrative e-mails;
- 2.5 to detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Company;
- 2.6 to apply generally accepted and recognized know-your-customer (KYC) and anti-money laundering (AML) rules and policies in order to comply with applicable the laws and regulatory rules;
- 2.7 to communicate with You about our products, services, promotions, events and other news and information we think will be of interest to You; and
- 2.8 develop new products and services.

## **3. COOKIES**

The Website uses cookies. A cookie is a small file of letters and numbers that we put on Your computer, if You give us Your consent [in a window that pops up when you enter the Website]. These cookies allow us to distinguish You from other users of the Website, which helps us to provide You with a good experience when You browse our Website as well as allows us improve the site. The cookies we use are functionality and targeting cookies. We collect data set out in Clause 1.2 above by way of cookies.

If You wish to prevent any cookies being stored on Your device, You can change Your cookie settings in Your browser. Please note, however, that in doing so, certain functionalities of the Website may be limited thereby affecting the user experience.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

## **4. DISCLOSURE OF YOUR INFORMATION**

4.1 We do not disclose any of Your personal data to any third parties except:

4.1.1 to business partners, suppliers and sub-contractors whose services we use for the purposes of conducting our business activity and the performance of our obligations to You under the Dragonglass Token Purchase Agreement. Most of such third-party service providers are considered data processors in relation to Your data. We will make sure that they process Your data on the terms and conditions equivalent to those set out in this Privacy Policy and apply all technical and organisational security measures required under applicable laws and regulations. We will at all times remain liable for the lawful processing of Your personal data by the data processors chosen by us. The list of such third-party data processors is accessible on our Website and will be updated from time to time;

4.1.2 where we transfer Your personal data to a third party as part of a sale of some or all of our business or as a result of any restructuring or reorganization of our business. In such case we will take all measures to ensure that Your personal data continue to be protected;

4.1.3 in order to enforce any terms of the Dragonglass Token Purchase Agreement, any other terms that apply to the Token Sale, or our rights arising from agreements, laws and regulations;

4.1.4 analytics and search engine providers that assist us in the improvement and optimization of our site;

4.1.5 in cases where we are under a duty to disclose or share Your personal data in order to comply with any legal obligation, for example, if required to do so under applicable law, by a court order or for the purposes of prevention of money laundering, fraud or other crime.

4.2 In addition, we share certain information on the buyers of the Dragonglass Tokens to advertisers and advertising networks. We do not, however, disclose identifiable information about You to any of them. Instead, we may provide them with aggregated information about Token buyers. We may also use such aggregated information to help advertisers reach the kind of audience they want to target (for example, women in London). We may make use of Your personal data to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

## **5. SECURITY AND RETENTION OF PERSONAL DATA**

5.1 We take organisational and technical measures to protect Your personal data at our disposal. We have approved internal documents regulating personal data security

measures. We have appointed a responsible person in the company for the protection of personal data. We limit access to Your personal data to those of our employees, consultants or other co-workers who need to have access thereto in order to carry out their work tasks.

- 5.2 All the collected personal data is stored in the data centers located on the territories of European Union Member States or the countries of the European Economic Area.
- 5.3 Please note that we may also be under additional obligations to retain certain data concerning the User under applicable legislation.
- 5.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect Your personal information, we cannot guarantee the security of Your information transmitted to us and any transmission is at Your own risk.
- 5.5 Dragonglass websites and services may contain links to and from other websites and services. We are not responsible for the privacy practices or the content of any third party sites. Please check the individual privacy policy of any such websites or services before You submit any personal data to them.
- 5.6 Data regarding the correspondence or notices between us and You and the problems reported is retained no longer than for 24 months from the creation of such data.
- 5.7 Any other personal data on You is retained while Your account with our Website is active and for three years thereafter.
- 5.8 Please note that we may also be under additional obligations to retain certain personal data concerning You for longer periods than set out above under applicable legislation.

## **6. KEEPING YOUR ACCOUNT SECURE**

- 6.1 You are solely responsible for the security of the access to Your account on the Website. Please ensure that You do not allow anyone else to access the Service in Your name and sign off after You have finished accessing Your account.
- 6.2 You are responsible for all orders, and for the accuracy of all information, sent via the internet using Your user ID, security key, password or any other personal identification used to identify You on the Services.
- 6.3 You will be liable to us for all orders or transactions placed by use of Your user ID, personal key or password, even if such use might be wrongful. We will not be liable to You for any loss that You may incur as a result of misuse of Your user ID, security key or

password, and we accept no liability resulting from its unauthorised use, whether fraudulent or otherwise.

## **7. YOUR RIGHTS**

- 7.1 You have the right to access Your personal data processed by us and may demand the correction of inaccurate personal data.
- 7.2 If the processing of personal data is not allowed under applicable law, You have the right to demand the termination of the processing of the personal data, termination of the disclosure of the personal data and closure or deletion of personal data processed.
- 7.3 You have the right of recourse to the Data Protection Inspectorate or a court if You find that Your rights are violated in the processing of Your personal data by us, unless a different procedure for contestation is provided under applicable legislation.

## **8. CHANGES TO OUR PRIVACY POLICY**

We may unilaterally update our Privacy Policy from time to time. Thus, You are advised to review this page periodically for any changes. We will notify You of any changes by posting the new Privacy Policy on this page. In case of any material changes to the Privacy Policy we will inform You thereof via e-mail or notification on the Website. The changes are effective immediately after they are posted on this page.

## **9. CONTACT FOR PRIVACY RELATED QUESTIONS**

If You have any questions or suggestions about our way of processing You personal data, this Privacy Policy or exercising Your rights in relation to the Privacy Policy do not hesitate to contact us at [support@dragonglass.co](mailto:support@dragonglass.co) for details.

### **Dragonglass OÜ**

Tallinn, 10134, Estonia, European Union

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