

TOKENEO.

Initial Coin Offering (“ICO”) Privacy Policy

Last updated: January 1, 2018

This Privacy Policy (“Policy”) describes how information about you is collected, used, and disclosed by Tokeneo. and its subsidiaries and affiliated companies (“Company,” “we,” “us,” “our”) when you register for or participate in the ICO promoted on our website.

Collection of Information

Information You Provide to Us

We may collect information you provide directly to us. For example, we collect information when you express interest or register for our ICO. The types of information collected include, but are not limited to: your name, entity name, physical address, telephone number(s), email address, date of birth, government-issued photo identification or other identification, account numbers, gender, nationality, country of residence, and cryptocurrency addresses.

Our third-party service provider may collect your payment method information for use in connection with your payments.

Information We Collect Automatically

When you access our Site, we automatically collect information about you, including but not limited to:

- **Log information:** We collect log information about your use of our Site. Such information may include: the type of browser you are using, access times, pages viewed, your IP address, and the pages you visited before or after navigating to our Site.
- **Device information:** We collect information about the device you use to access our Site. Such information may include: the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Usage information:** We collect information contained in or relating to any communication that you send to us or send through our Site, as well as meta-data associated with the communication.
- **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 by Cookies and Other Tracking Technologies:** We and our third-party vendors may use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that helps us improve the Site and your experience, see which features of the Site are popular, and count visits. Web beacons are electronic images that may be used on our Site or in emails to help deliver cookies, count visits, and understand usage and campaign effectiveness. We may later associate the usage and other information we collect with personal information about you, as permitted or required by law.

Information We Collect From Other Sources

We may also collect information about you from additional online and offline sources including commercially available third-party sources such as consumer reporting agencies. We may combine this information with other information we have collected about you under this Policy.

Use of Information

We may use information about you for various purposes, including to:

- Conduct our ICO;
- Evaluate and determine your eligibility to participate in our ICO;
- Send you notices, updates, security alerts, and support and administrative messages;
- Respond to your comments, questions, and requests and provide customer service;
- Detect, investigate, and prevent fraudulent transactions or other unlawful activities, and protect the rights and property of the Company and others; and
- 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 applicable laws and regulations.

Sharing of Information

We may share information about you as follows, or as otherwise described in this Policy:

- With service providers who need access to such information to carry out work on our behalf;
- 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;
- If we believe your actions are inconsistent with our terms or policies, or to protect the rights, property, and safety of the Company or other parties;
- In connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business by another company;
- Between and among the Company and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and

- With your consent or at your direction.

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

Transfer of Information to and from the United States

The Company is based in the United States and the information we collect is governed by United States law. By communicating with us regarding our ICO or otherwise, you consent to the transfer of information to and from the United States and other countries in which Tokeneo operates, where you might not have the same rights as under United States law.

Security

We take our responsibility to protect the privacy and confidentiality of your information, including personal information, seriously. We take reasonable measures to help protect information about you from loss, theft, misuse, and unauthorized access, disclosure alteration, and destruction.

Changes

We may change this Policy from time to time. If we make changes, our notification will consist of changing the date on the top of the policy. While in some cases, and at our discretion, we may provide you with additional notice, we encourage you to review the most up-to-date Policy whenever you access our Site. All changes will become effective when posted unless indicated otherwise.

Your Choices

You may request that the Company update or correct information about you at any time. We may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.