

Privacy Policy

KOLOONIA PRIVACY POLICY

Last Updated: July 1st, 2019

Koloonia Exchange and Security Tokens Offering (“Koloonia”, “Us”, or “We”) provides this Privacy Policy because we know that you care about how your information is collected, used, shared and retained. This Privacy Policy applies to information collected when you access our website located at <https://www.koloonia.com> (the “Site”), and purchase and/or use our services (“Services”).

By visiting our Site, purchasing, accessing or using our Services, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. Capitalized terms not defined in this Privacy Policy have the meaning ascribed to them in the Terms of Use.

What Information We Collect; the Purpose of Collection and Use

We collect the following categories of information. Subscribers of our Services (“Subscribers”) authorize the collection, processing and transfer of such information, and assume contractual responsibility for providing notification to Subscriber’s customers who are end users of the Services and obtaining all consents as required under applicable laws and regulations.

Contact Information: We collect contact information on our Site from visitors, and customers who wish to obtain information or support, to purchase our Services or receive our newsletter. Contact information is provided via browser forms

or online forms, and includes first name, last name, email address, name of the organization, and country (“Contact Information”). This Contact Information is used by our sales, support and product teams to contact our Site visitors and customers, as appropriate, for the purpose of providing the requested information, support, Services, newsletters, or other news, materials or updates regarding our Services.

Service Information: In the course of performing our Services, we collect the following categories of information (collectively, “Service Information”).

End User Information: End User means (i) Subscribers customers who are end users of our Services; and (ii) all customers of Koolonia’s other Subscribers who seek to enter into Transactions (as defined below) through the Services. We collect End User information from our Subscribers or directly from End Users. End User information includes but is not limited to, driver license number, social security number, financial information, KYC information, business registration, by-laws and other corporate information. End User information is used to provide the Services, facilitate the Transactions, provide support, and to operate, maintain and improve the Services.

Transaction Information: We collect transaction related information for transactions conducted by End Users through the Services (“Transactions”). Transaction information includes but is not limited to, bank account information, credit card information, amount of funds deposited, and any traderelated information including but not limited to, price, quantity, and any associated or supporting data related to the trade. Transaction information is used to provide the Services, facilitate the Transactions, provide support, and to operate, maintain and improve the Services.

Billing Information: We collect billing and payment information which may include a purchase order number, an account number, credit card number, expiration date, billing zip code, bitcoin-related information, instructions for wire transfers and/or ACH transfers (“Billing Information”). Billing Information is collected and processed by our third-party payment processor operating as our agent (See, Onward Transfers to Third Parties). Koloonia does not directly obtain or process any Billing Information; except in the case of ACH transfers in which case we obtain the Billing Information related to ACH transfers and send (not store) it to our third party bank processors operating as our agent (See, Onward Transfers to Third Parties).

Other Information: In addition to the Contact Information, Service Information and Billing Information, we may collect or receive the following information:

- **From Your Activity.** In an ongoing effort to improve the Site and the Services, we automatically collect certain information when visitors visit the Site and when Subscribers and End Users use the Services. This information consists of IP addresses, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Site visitors visit, and similar information concerning your use of the Site and the Services.

- **From Cookies.** A “Cookie” is a string of information that a website or web-based service stores on a user’s computer, which the user’s browser thereafter provides to the website each time the user submits a query to the site. Koloonia uses cookies to track pages that users visit during each session – in order to help us improve user experience and to better understand and track how our Site and Services are being used. Our cookie policy is available at <https://www.koloonia.com/static/legal/koloonia-cookie-policy.pdf>.

Users who prefer to not have cookies placed on their machines should set browser software to refuse cookies prior to accessing the Site and/or the Services, while understanding that certain features of the Site and/or the Services may not function properly as a result. Users who refuse cookies assume responsibility for any resulting impaired functionality.

- **From Web Beacons.** A “Web Beacon” is an object embedded in a web page, which allows website operators to check whether a user has viewed a particular web page or an email, and which typically are invisible to the user. Koolonia may use Web Beacons on its Site and in its emails to count users who have visited particular pages or viewed emails, and with respect to Koolonia’s Services. Note that Web Beacons are not used to access personal information. They are used purely to compile aggregated statistics about Site and the Services usage. Web Beacons collect only a limited set of information including a Cookie number, time and date of a page or email view, and a description of the page or email on which the Web Beacon resides. While you may not decline Web Beacons, you may render them ineffective by declining all Web Beacons or modifying your browser settings to provide notifications each time a Web Beacon is tendered – allowing you to accept or decline Web Beacons on an individual basis.

- **Analytics and Remarketing.** We use one or more third-party analytics services (such as Google Analytics) to evaluate your use of the Site and the Services, compile reports on activity (based on their collection of IP addresses, Internet service provider, browser type, operating system and language, referring and exit pages and URLs, data and time, amount of time spent on particular pages, what sections of the Site you visit, number of links clicked while on the Site, search terms and other similar usage data), and analyse performance metrics. These third parties use cookies and other technologies to help analyse and provide us the data. By accessing and using the Site and/or the Services, you consent to the processing of data about you by these analytics providers in

the manner and for the purposes set out in this Privacy Policy. For more information on these third parties, including how to opt out from certain data collection, please visit the sites below. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Site and/or the Services.

For Google Analytics, please visit: <https://www.google.com/analytics>

We also use one or more third-party remarketing services (including Facebook, Twitter, Google Adwords) to advertise on third party websites to previous visitors to our Site. It could mean that we advertise to previous visitors who haven't completed a task on our Site, for example using the contact form to make an enquiry. These third-party remarketing service providers use cookies to serve ads based on a past visit to the Site. Any data collected by such third party remarketing service providers will be used in accordance with this Privacy Policy and the privacy policy of such third party remarketing services provider. For more information on such third party remarketing service providers, including how to opt out from certain data collection, please visit the following links:

For Google Adwords, 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 or permanently using a browser plugin.

Aggregate Data. In an ongoing effort to better understand our users and the Site and the Services, we may analyse your information in aggregate form and also merge it with other data to use for our reporting, planning, development, operating, maintaining, managing, and improving the Site and the Services and for promotional purposes. This aggregate

information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our Service and the Site to current and prospective business partners and to other third parties for other lawful purposes.

Additional Uses. We also use Contact Information, Service Information and other information collected pursuant to this Privacy Policy to respond to general inquiries, solicit feedback regarding our Services, provide relevant content on our Site, and to communicate with you via email regarding our current and future Services.

Onward Transfer to Third Parties

Like many businesses, we hire other companies to perform certain business-related services. We may disclose personal information to certain types of third party companies but only to the extent needed to enable them to provide such services. The types of companies that may receive personal information and their functions are: customer service and marketing assistance, performing business, sales, and traffic analyses and analytics, supporting our website functionality, payment processors, and supporting other features offered through our Site and Services. All such third parties function as our agents, performing services at our instruction and on our behalf pursuant to contracts which require they provide at least the same level of privacy protection as is required by this Privacy Policy and implemented by Koolonia. With regard to the Principle of Accountability for Onward Transfer, we remain liable if our agent processes such personal information in a manner inconsistent with the Privacy Shield Principles, unless we prove that we are not responsible for the event giving rise to the damage.

Opt-In to Certain Onward Transfers

We will not transfer your personal information to a third party controller without first providing you with information regarding the identity of such controller or the nature of such controller's business, and obtaining your opt-in consent.

We will not disclose your sensitive personal information to any third party without first obtaining your opt-in consent. You may grant such consent by contacting us at help@koolonia.com. In each instance, please allow us a reasonable time to process your response.

Business Transfer

In the event of a merger, dissolution or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal information, would be transferred to the surviving entity in a merger or the acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy and confidentiality of such personal information as set forth in this Privacy Policy.

Disclosures to Public Authorities

We are required to disclose personal information in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. We may also disclose personal information to other third parties when compelled to do so by government authorities or required by law or regulation including, but not limited to, in response to court orders and subpoenas.

Opt-Out for Direct Marketing

You may opt out at any time from the use of your personal information for direct marketing purposes by emailing the instructions to this email address: help@koolonia.com. Please allow us a reasonable time to process your request.

How We Protect Your Information

We have implemented security policies, rules, and technical measures to protect and safeguard your personal information within our custody from unauthorized access, improper use or disclosure, unauthorized modification, as well as unlawful or unintended destruction or loss, taking into account the risks involved in processing and the nature of such data, and comply with applicable laws and regulations.

You should keep in mind, however, that no internet transmission is 100% secure or error-free. In particular, email sent to or from the Site and/or the Services may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail or other electronic means.

External Sites

Our Site may contain links to other sites, for instance regarding our partners or clients, or media coverage of Koloonia services. Other sites may also reference or link to our site. Koloonia encourages you to review the privacy and security policies of any externally linked websites that may be accessed through the Site. Please note Koloonia is not responsible or liable for the information collection and disclosure practices of any such external websites and for the privacy practices or content of such external sites. Please check the privacy policies of these external websites before you submit any personal information or other information to them.

Access to Personal Information

Upon request to help@koloonia.com, we will provide you with confirmation as to whether we are processing your personal information, and have the data communicated to you within a reasonable time. You have the right to correct, amend or delete your personal information where it is inaccurate or has been

processed in violation of this Privacy Policy. We may require payment of a non-excessive fee to defray our expenses in this regard. Please allow us a reasonable time to respond to your inquiries and requests.

Your Choices

Should you choose to unsubscribe from any mailing lists for which you registered, you may do so by following the instructions on how to unsubscribe provided in all Koolonia communications.

Retention of Personal Information

We will retain your personal information in a form that identifies you only for as long as it serves the purpose(s) for which it was initially collected as stated in this Privacy Policy, or subsequently authorized. We may continue processing your personal information for longer periods, but only for the time and to the extent such processing reasonably serves the purposes of archiving in the public interest, journalism, literature and art, scientific or historical research and statistical analysis, and subject to the protection of this Privacy Policy. After such time periods have expired, we may either delete your personal information or retain it in a form such that it does not identify you personally.

Important Notice to All Non-U.S.

Residents Our servers are located outside of the US. If you are located outside of the US, please be aware that any information provided to us, including personal information, will be transferred from your country of origin to Estonia or other jurisdictions. Except in the case of data transfers under the EU-US Privacy Shield, your decision to provide such data to us, or allow us to collect such data through our Site and/or the Services, constitutes your consent to this data transfer.

Important Notice for Residents of the European Economic Area

Koloonia complies with the EU-US Privacy Shield Framework as set forth by the Estonia Department of Commerce regarding the collection, use, and retention of personal information from the European Union member countries (including Iceland, Liechtenstein and Norway). Koloonia has certified that it adheres to the Privacy Shield principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access and Recourse, Enforcement and Liability (the “Privacy Shield Principles”).

Koloonia is subject to the investigatory and enforcement powers of the Estonia Trade Commission.

In compliance with the EU-US Privacy Shield Principles, Koloonia commits to resolve complaints about your privacy and our collection or use of your personal information. EU individuals with inquiries or complaints regarding this Privacy Policy should first contact Koloonia at help@koloonia.com.

Koloonia has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to BBB PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by Koloonia, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint. If these processes do not result in a resolution, you may also contact your local data protection authority for assistance. If your complaint still remains unresolved, then you have the right to invoke binding arbitration by the Privacy Shield Panel upon written notice to Koloonia at help@koloonia.com.

About Children

Koloonia does not knowingly collect information from children under the age of 16 through the Site and/or the Services. If you are under the age of 16, please do not provide any information through the Site and/or the Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Privacy Policy by instructing their children to never provide any information on this Site, the Services or any other web site without their permission. If you have reason to believe that a child under the age of 16 has provided information to Koloonia through the Site and/or the Services, please contact us using the information in the Contact Us section of the Site, and we will endeavour to delete that information from our databases.

Changes to this Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and will post any changes on the Site as soon as they go into effect. By accessing the Site and/or the Services after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

Contact us

If you have any queries about the privacy statement or to report a privacy issue, please contact us in this way:

Email: help@koloonia.com