

# Privacy Policy

*Last Updated: 24<sup>th</sup> May 2018*

Akropolis Decentralised Ltd is committed to protecting the privacy of its users and we therefore ask that you please read our Privacy Policy before providing us with any information about you or any other person.

This Policy sets out what Personal Data we collect, how we process it and how long we retain it. This Policy is applies to all of our processing activities where we act as a data controller.

In this policy, "we", "us" and "our" refers to Akropolis Decentralised Ltd a company incorporated in Gibraltar with its registered address at 23 Portland House, Glacis Road, Gibraltar and incorporation number 116430. For more information about us, see the Contact Us section of this policy.

In this Policy , "personal data" means any information relating to you as an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

In this Policy, "processing" means any operation or set of operations which is performed on personal data (as defined in this Privacy Policy) or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

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## How we collect information from you

We collect information about you when you:

- Visit our website;
- Contact us either through our website or through other direct means of electronic communication;
- When you sign up to our newsletter;
- Enter into a contract with us;
- Use our services or offerings (including our app); and/or
- Enter into any other relationship with us or interact with us or our services.

## What type of information is collected?

The personal information we collect might include your:

Name; address; email address; telephone number; date of birth; nationality; country of residence; social media profiles; self-portrait photograph; interest in our project; IP address; the type of device through which you browse our website or use our services or app including the operating system, your location, time date and duration of your visit to our website and previous visits to our website; and ERC20 compatible wallet address or other cryptographic wallet address.

We may also ask you to provide evidence of your identity by asking you for a copy of your passport, driving licence, proof of residence. We may also need to ask you about your income and source of wealth. We are required to ask for this information to comply with anti-money laundering (AML) legislation such as the Proceeds of Crime Act 2015, to ensure we safeguard against and report any suspicious activity.

## Your information and the Blockchain

Blockchain technology, also known as distributed ledger technology (or simply 'DLT'), is at the core of our business. Blockchains are decentralized and made up of digitally recorded data in a chain of packages called 'blocks'. The manner in which these blocks are linked is chronological, meaning that the data is very difficult to alter once recorded. Since the ledger may be distributed all over the world (across several 'nodes' which usually replicate the ledger) this means there is no single person making decisions or otherwise administering the system (such as an operator of a cloud computing system), and that there is no centralized place where it is located either.

Accordingly, by design, a blockchain's records cannot be changed or deleted and is said to be 'immutable'. This may affect your ability to exercise your rights such as your right to erasure ('right to be forgotten'), the right to rectification of your data or your rights to object or restrict processing, of your personal data. Data on the blockchain cannot generally be erased or changed, although some smart contracts may be able to revoke certain access rights, and some content may be made invisible to others, however it is not deleted.

In certain circumstances, in order to comply with our contractual obligations to you (such as delivery of tokens you have purchased) it may be necessary to write certain personal data, such as your Ethereum/Bitcoin or other cryptocurrency wallet address, onto the blockchain; this is done through a smart contract and requires you to execute such transactions using your wallet's private key.

In most cases ultimate decisions to (i) transact on the blockchain using your Ethereum/Bitcoin or other cryptocurrency wallet address, as well as (ii) share the public key relating to your Ethereum/Bitcoin or other cryptocurrency wallet address with anyone (including us) rests with you.

IF YOU WANT TO ENSURE YOUR PRIVACY RIGHTS ARE NOT AFFECTED IN ANY WAY, YOU SHOULD NOT TRANSACT ON BLOCKCHAINS AS CERTAIN RIGHTS MAY NOT BE FULLY AVAILABLE OR EXERCISABLE BY YOU OR US DUE TO THE TECHNOLOGICAL INFRASTRUCTURE OF THE BLOCKCHAIN.

IN PARTICULAR THE BLOCKCHAIN IS AVAILABLE TO THE PUBLIC AND ANY PERSONAL DATA SHARED ON THE BLOCKCHAIN WILL BECOME PUBLICLY AVAILABLE.

## Information written on the blockchain

When you interact with our digital services such as our app or token generation event, you will enter into an agreement which will be executed via the public blockchain. Your personal information stays safe with us, however certain information about our digital agreement on the blockchain must be published in order to comply with the public contract requirements. Information such as:

- Your cryptographic wallet address;
- The amount of crypto currency transferred to our contract addresses;
- The amount of tokens you receive from the token generation event or other sources, furthermore any movement of tokens you will make;
- The rate of Ethereum you use to purchase the tokens;
- Your tier or purchase approval rating assigned by ourselves;
- The date and time stamp of your transaction; and
- Failed transactions by your address.

In the case you wish to contact us about information being published on the blockchain, or an unsuccessful service- please reach out and include the transaction hash of any successful or failed transactions to reference.

If a transaction is incomplete and does not get successfully signed on the blockchain, agreements based on successful blockchain execution cannot be met.

# How we use your personal information

We use personal information about you in connection with the following purposes:

## **Provision of services and management:**

- to provide you with the information, products and services that you have requested from us;
- to complete any transaction you are undertaking with us;
- to manage and operate your account to use our services;
- to perform a contractual obligation we have to you; and/or
- to meet a legal or regulatory obligation.

## **Service improvements:**

- to ensure that content from our site and app is presented in the most effective manner for you;
- to administer our site & app and for internal business administration and operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to notify you about changes to our service;
- as part of our efforts to keep our site safe and secure;

## **Direct Marketing:**

- to provide you with information about other services we offer that are similar to those that you already have or have enquired about;
- to provide you with other marketing material such as our Newsletter.

If you do not want your personal information to be used for marketing purposes, please contact us on the above details.

## **Automated decision-making**

We do not use automated-decision making methods (including profiling), save that we may risk profile our clients in compliance with applicable anti-money laundering legislation. However, certain third parties such as our KYC provider may use certain automated decision-making tools or software to verify your identity and in order to check whether you are in a country where we are unable to offer you our services. In addition certain third parties may use certain automated decision-making tools or software. We are not responsible for the privacy practices of others and we will take reasonable steps to bring such automated decision-making to your attention, but you are encouraged to become familiar with the privacy practices of any third parties you enter into any agreements with.

## Use of Third Party Applications & Cookies

Cookies are a feature of web browser software that allows web servers to recognize the computer or device used to access a website. A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. They allow the website to remember your actions and preferences) over a period of time, so you don't have to keep re-entering them whenever you visit one of our websites or browse from one page to another. They also enable us to track and monitor activity on our website to improve our services (for marketing and functionality purposes) as well as allowing you to interact with social media services.

In addition to the uses of cookies described above, these entities may use other methods, such as the technologies described below, to collect information about your use of our website and other websites and online services. These are:

**Pixels tags-** Pixel tags (which are also called clear GIFs, web beacons, or pixels), are small pieces of code that can be embedded on websites and emails. Pixels tags may be used to learn how you interact with our website pages and emails, and this information helps us and our partners provide you with a more tailored experience.

**Device Identifiers-** A device identifier is a unique label can be used to identify a mobile device. Device identifiers may be used to track, analyse and improve the performance of the website and ads delivered.

We use the following third party services which may also include the use of cookies.

### ***Rackspace***

We use Rackspace to provide our hosting infrastructure.

Rackspace use cookies in order to monitor usage of our website and online offerings and in order to ensure availability of those services.

We do not store any information collected by Rackspace. Rackspace's privacy policy is available at [Rackspace's website](#).

The relevant cookies are: DYNSRV cookie

### ***Cloudflare***

We use Cloudflare to keep our online services, including our website, secure.

Cloudflare uses cookies in order to traffic to our website and online offerings and in order to identify trusted web traffic and prevent cybercrime.

We do not store any information collected by Cloudflare . Cloudflare's privacy policy is available at [Cloudflare's website](#).

The relevant cookies are: \_cfduid cookie

### **Facebook**

We use Facebook on our website in order to show where you have "liked" our website on the Facebook social network. Facebook uses cookies in order track your activity and in order to serve our ads on to you on their platform.

We do not store any information collected by Facebook. Facebook's privacy policy is available at <https://www.facebook.com/about/privacy> their cookie policy is available at <https://www.facebook.com/policies/cookies/>

The relevant cookies are: act, fr, tr cookies

### **Google Analytics**

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website.

Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

The relevant cookies are: the \_ga, \_gat, \_gid cookies

We do not store the information collected by Google Analytics and this is stored by them.

You also have the option of objecting to the collection of personal data by Google Analytics from our website by downloading and installing a browser add-on which can be found under the link <https://tools.google.com/dlpage/gaoptout>

Further information and the applicable data protection provisions of Google please visit [Google policies](#) and [Analytics terms](#).

Google Analytics, it purpose and function is further explained under the following Link <https://www.google.com/analytics/>

### **Cookie Opt-Out**

When you visit our site, you are able to opt-out of the use of all cookies which are not strictly necessary. If you Opt-out you may continue to browse our website but certain functionality may not be available due to technological constraints as some features of

our website relies on cookies to operate correctly.

## How long we keep your information for

We retain your information only for as long as is necessary for the purposes for which we process the information as set out in this Privacy Policy. Records can be held on a variety of media (physical or electronic) and formats.

Retention periods are determined based on the type of record, the nature of the record and activity and the legal or regulatory requirements that apply to those records. Typically, personal data which is collected pursuant to our legal obligations (such as AML) are retained for 5 years. Where personal data is collected pursuant to a contract or prior to the creation of a contract, these are retained for 6 years after the termination of the contract pursuant to our legitimate interests in defending any legal claims which may be brought against us.

However, we may retain your personal data for a longer period of time where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person or where we have a legitimate interest to do so.

All personal data is retained in accordance with our internal Retention and Deletion Policy.

## Sharing your personal information

We may pass your information to our Business Partners, administration centres, third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing our services to you. When we use any other third party service providers, we will disclose only the personal information that is necessary to deliver the service required and we will ensure that these requires them to keep your information secure and not to use it for their own direct marketing purposes.

In addition, we may transfer your personal information to a third party as part of a sale of some, or all, of our business and assets or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation. However, we will take steps to ensure that your privacy rights continue to be protected.

### **Transferring your information outside of the European Economic Area**

We may share your personal data with third party companies where we have a legal basis for doing so such as to provide you with our services or because we ourselves use service providers outside the of EEA in order to operate our business. If we transfer your information outside of the EEA to third parties we will take steps to ensure that your privacy rights continue to be protected as outlined in this Policy. This may require us to take certain additional steps to ensure that appropriate safeguards are in place if

that third country is not deemed by the European Commission to offer an adequate level of protection for your privacy rights, which may include use of contractual safeguards to allow you to be able to enforce your rights and ensure these are preserved. In certain circumstances, we may need to ask you for your explicit consent to such third country transfers, and will always do so in writing and giving you full information about why we need your consent and your right to withdraw that consent at any time (together with the consequences of withdrawal).

HOWEVER, WHEN INTERACTING WITH THE BLOCKCHAIN, AS EXPLAINED ABOVE IN THIS POLICY, THE BLOCKCHAIN IS A GLOBAL DECENTRALIZED PUBLIC NETWORK AND ACCORDINGLY ANY PERSONAL DATA WRITTEN ONTO THE BLOCKCHAIN MAY BE TRANSFERRED AND STORED ACROSS THE GLOBE.

## Your individual rights

You have certain rights under applicable legislation, and in particular under Regulation EU 2016/679 (General Data Protection Regulation or 'GDPR'). We explain these below. You can find out more about the GDPR and your rights by accessing the [European Commission's website](#).

### ***Right Information and access***

You have a right to be informed about the processing of your personal data (and if you did not give it to us, information as to the source) and this Privacy Policy intends to provide the information. Of course, if you have any further questions you can contact us on the above details.

### ***Right to rectification***

You have the right to have any inaccurate personal information about you rectified and to have any incomplete personal information about you completed. You may also request that we restrict the processing of that information.

The accuracy of your information is important to us. If you do not want us to use your Personal Information in the manner set out in this Privacy Policy, or need to advise us of any changes to your personal information, or would like any more information about the way in which we collect and use your Personal Information, please contact us at the above details.

### ***Right to erasure (right to be 'forgotten')***

You have the general right to request the erasure of your personal information in the following circumstances:

- the personal information is no longer necessary for the purpose for which it was collected;
- you withdraw your consent to consent based processing and no other legal justification for processing applies;
- you object to processing for direct marketing purposes;
- we unlawfully processed your personal information; and

- erasure is required to comply with a legal obligation that applies to us.

HOWEVER, WHEN INTERACTING WITH THE BLOCKCHAIN WE MAY NOT BE ABLE TO ENSURE THAT YOUR PERSONAL DATA IS DELETED. THIS IS BECAUSE THE BLOCKCHAIN IS A PUBLIC DECENTRALIZED NETWORK AND BLOCKCHAIN TECHNOLOGY DOES NOT GENERALLY ALLOW FOR DATA TO BE DELETED AND YOUR RIGHT TO ERASURE MAY NOT BE ABLE TO BE FULLY ENFORCED. IN THESE CIRCUMSTANCES WE WILL ONLY BE ABLE TO ENSURE THAT ALL PERSONAL DATA THAT IS HELD BY US IS PERMANENTLY DELETED.

We will proceed to comply with an erasure request without delay unless continued retention is necessary for:

- Exercising the right of freedom of expression and information;
- Complying with a legal obligation under EU or other applicable law;
- The performance of a task carried out in the public interest;
- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- The establishment, exercise, or defence of legal claims.

### ***Right to restrict processing and right to object to processing***

You have a right to restrict processing of your personal information, such as where:

- you contest the accuracy of the personal information;
- where processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed personal information;
- we no longer need to process your personal information but need to retain your information for the establishment, exercise, or defence of legal claims.

You also have the right to object to processing of your personal information under certain circumstances, such as where the processing is based on your consent and you withdraw that consent. This may impact the services we can provide and we will explain this to you if you decide to exercise this right.

HOWEVER, WHEN INTERACTING WITH THE BLOCKCHAIN, AS IT IS A PUBLIC DECENTRALIZED NETWORK, WE WILL LIKELY NOT BE ABLE TO PREVENT EXTERNAL PARTIES FROM PROCESSING ANY PERSONAL DATA WHICH HAS BEEN WRITTEN ONTO THE BLOCKCHAIN. IN THESE CIRCUMSTANCES WE WILL USE OUR REASONABLE ENDEAVOURS TO ENSURE THAT ALL PROCESSING OF PERSONAL DATA HELD BY US IS RESTRICTED, NOTWITHSTANDING THIS, YOUR RIGHT TO RESTRICT TO PROCESSING MAY NOT BE ABLE TO BE FULLY ENFORCED.

### ***Right to data portability***

Where the legal basis for our processing is your consent or the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, you have a right to receive the personal

information you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

### ***Right to freedom from automated decision-making***

Where any automated decision-making takes place, you have the right in this case to express your point of view and to contest the decision, as well as request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.

### ***Right to object to direct marketing ('opting out')***

You have a choice about whether or not you wish to receive information from us. We will not contact you for marketing purposes unless:

- you have a business relationship with us, and we rely on our legitimate interests as the lawful basis for processing (as described above)
- you have otherwise given your prior consent (such as when you download one of our guides)

You can change your marketing preferences at any time by contacting us on the above details. On each and every marketing communication, we will always provide the option for you to exercise your right to object to the processing of your personal data for marketing purposes (known as 'opting-out') by clicking on the 'unsubscribe' button on our marketing emails or choosing a similar opt-out option on any forms we use to collect your data. You may also opt-out at any time by contacting us on the below details.

Please note that any administrative or service-related communications (to offer our services, or notify you of an update to this Privacy Policy or applicable terms of business, etc.) will solely be directed at our clients or business partners, and such communications generally do not offer an option to unsubscribe as they are necessary to provide the services requested. Therefore, please be aware that your ability to opt-out from receiving marketing and promotional materials does not change our right to contact you regarding your use of our website or as part of a contractual relationship we may have with you.

### ***Right to request access***

You also have a right to access information we hold about you. We are happy to provide you with details of your Personal Information that we hold or process. To protect your personal information, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us on the above details.

### ***Right to withdraw consent***

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time by contacting us on the above details.

### ***Raising a complaint about how we have handled your personal data***

If you wish to raise a complaint on how we have handled your personal data, you can contact us as set out above and we will then investigate the matter.

### ***Right to lodge a complaint with a relevant supervisory authority***

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Data Protection Commissioner under the Data Protection Act, which is presently the Gibraltar Regulatory Authority (GRA). You may contact the GRA on the below details:

Gibraltar Data Protection Commissioner  
Gibraltar Regulatory Authority  
2nd Floor, Eurotowers 4  
1 Europort Road  
Gibraltar

**Email:** [info@gra.gi](mailto:info@gra.gi)

**Phone:** (+350) 200 74636

**Fax:** (+350) 200 72166

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work, or the place where you allege an infringement of one or more of our rights has taken place, if that is based in the EEA.

## Additional Information

### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Hyperlinks**

We may provide hyperlinks from this website to web sites of other organisations or associated companies. Please note that we will not be liable for the contents of linked web sites or any transactions carried out with organisations operating those websites. The privacy policies of others may differ significantly from our Privacy Policy. Therefore, we encourage you to read the privacy statement/policy of each and every website that collects personal data.

## **Review of this Policy**

We may make changes to this Policy from time to time. Where we do so, we will notify those who have a business relationship with us or who are subscribed to our emailing lists directly of the changes, and change the '*Last updated*' date above. We encourage you to review the Policy whenever you access or use our website to stay informed about our information practices and the choices available to you. If you do not agree to the revised Policy, you should discontinue your use of this website.

## **Contact Us**

Any questions regarding our Policy or your rights as a Data Subject should be sent to:

Privacy Manager  
Akropolis Decentralised Ltd.  
Suite 23 Portland House  
Glacis Road  
Gibraltar, GX11 1AA

**Email:** [privacy@akropolis.io](mailto:privacy@akropolis.io)