

FINMINITY PRIVACY POLICY

FINMINITY (the “Company”) is committed to maintaining robust privacy protections for its users. Our Privacy Policy (“Privacy Policy”) is designed to help you understand how we collect, use and safeguard the information you provide to us and to assist you in making informed decisions when using our Service.

For purposes of this Agreement, “Site” refers to the Company’s website, which can be accessed at <https://www.finminity.com>

The terms “we,” “us,” and “our” refer to the Company.

“User” refers to you, as a user of our Site or our Service.

By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use (found here), and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy. This policy will be effective from the time you start using the Site. It is understood and presumed per se that by the fact of the Site use and Company’s token purchase or by providing the company with Personal Data directly on Company’s request, the respective user has fully read, understood and irrevocably accepted this policy. If any user, does not agree with this policy in general or any part of it, such User should discontinue use of the Website and or purchase of Company tokens.

1. INFORMATION WE COLLECT, PROCESS & USE

1.1. The Company collects Personal Data provided to the Company by the Users in the following ways:

1.1.1. *Information provided by User:* The types of information the Company collects from User including the below information that is provided in any Company’s token sale:

- Username and password
- Full name
- Photograph of your face
- Photograph of your identity document;
- Identification card/passport number
- Nationality
- Address
- Email address
- Date of birth
- Amount (intended amount to invest)
- Digital wallet information
- Phone number
- any personal information the User may include in communications with the Company or in social media forums operated by or on behalf of the Company (if any);

NB: If the User refuses to provide any of the information listed above that the Company has identified as being required to participate in any Company's token sale, the User will be unable to participate in that Company's token sale

1.1.2. *Information collected automatically through User's participation in any Company's token sale:* Company automatically collects certain information regarding User's participation in any Company's token sale, including (as applicable) User's:

- device and connection information, such as unique device identifier, operating system version, hardware model, browser type and version, mobile platform, and mobile network information
- log information, such as internet protocol address, uniform resource locator, clickstream data, search queries and visited pages; and
- location information.

1.1.3. *Information collected through cookies or similar technologies:* The company may use cookies to recognize a person as Company's token sale User, customize the Website and advertising, measure promotional effectiveness and collect information about User's computer or other access device to mitigate risk, help prevent fraud and promote trust and safety. The User may control the use of cookies within User's internet browser's settings. If User reject or delete certain cookies, he shall be aware that the performance of the related features and functions of the Website and services may be impaired

1.1.4. *Information you provide us by registering for an account:* In addition to the information provided automatically by your browser when you visit the Site, to become a subscriber to the Service you will need to create a personal profile. You can create a profile by registering with the Service and entering your email address, and creating a user name and a password. By registering, you are authorizing us to collect, store and use your email address in accordance with this Privacy Policy.

1.2 The User acknowledges that he has to complete a Know Your Customer (KYC) check for the purchase of the Company's tokens which must be in form and substance satisfactory to the Company. KYC check can be carried by providing necessary information with regard to identification of the User, beneficial owner and origin of the funds, the scope and type of information depending on the type of User and the purchase amount.

1.3 The Company may refuse the User access to the Site in case, the Company have grounded doubts as to validity, authenticity and genuineness of the Personal Data, provided by the User.

1.4 The Company uses the User's Personal Data to:

- 1.2. Administer the Site and provide services
- 1.3. Enforce agreements, resolve disputes, collect fees and troubleshoot problems;
- 1.4. Distribute and account Company's tokens;
- 1.5. Respond to User's communications to the Company;
- 1.6. Personalize the Site for the User;
- 1.7. Send technical notices, support and administrative messages;
- 1.8. Communicate with the User about products, services, promotions, events and other news and information, the Company think will be of interest to the User;

- 1.9. Monitor and analyze trends, usage and activities in connection with the Site;
- 1.10. Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Company and others;
- 1.11. Verify compliance with the terms and conditions governing the use of the Website.

2. YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL INFORMATION

1. The user has the right to:
 - 1.1. Receive information on Personal Data concerning him/her. The right may be restricted if the exercise of it might adversely affect the rights and freedoms of others
 - 1.2. Access his/her Personal Data;
 - 1.3. Request the correction of his/her inaccurate Personal Data;
 - 1.4. Request erasure of his/her Personal Data;
 - 1.5. Request restriction of processing of his/her Personal Data;
 - 1.6. Object processing of his/her Personal Data;
 - 1.7. Withdraw his/her consent to the use of his/her Personal Data for a particular purpose.

If the User decides to exercise any of the above rights, he/she should send the respective notification to the Company at contact@finminity.com. Termination, deletion and/or correction requests are acted upon within 30 days from receipt of the request.

Please note that it is obligatory for the Company to process your Personal Data for the Core Purpose as stated above, without which some services or features provided by “The Company” may be affected. If we do not have your consent to process your Personal Data for the Ancillary Purposes, we will not be able to keep you updated about our future, new and/or enhanced services and products.

Nevertheless, you may stop receiving promotional activities by:

- (a) unsubscribing from the mailing list;
- (b) editing the relevant account settings to unsubscribe; or
- (c) sending a request to contact@finminity.com

3. HOW WE PROTECT AND SHARE INFORMATION

The Company is obliged to do any and all efforts and actions prescribed by applicable law to store any of Personal Data of the Users in secrecy.

1. The Company stores and process Personal Data of the Users on Company’s servers in various jurisdictions, where facilities of the Company and / or service providers are located. By submitting Personal Data, the User agree to this transfer, storing, or processing. The Company will take all steps reasonably necessary to ensure that Personal Data of the Users is treated securely and in accordance with this Policy. The Company strives to protect Personal Data of the Users under internationally

acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration.

2. The Company will not share Personal Data of the Users with any third parties other than Company's respective identity verification partners. The company reserves its right to share Personal Data of the Users with:
 - Banking and brokerage partners of the Company, if necessary
 - Other Company's affiliated entities in order to help detect and prevent potentially illegal acts and violations of Company's policies and to guide decisions about Company's products, services and communications;
 - Service providers that perform certain work for the Company (such as hosting providers, identity verification, investor status verification, support, payment, tokens accounting and email service providers etc.)
 - Law enforcement, government officials or other third parties when the Company is compelled to do so by a subpoena, court order, or similar legal procedure; or the Company believes in good faith that the disclosure of Personal Data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of policies of the Company;
 - When the Company believes, in its sole discretion, that the disclosure of personal information is necessary to report suspected illegal activity or to investigate violations of Company's terms and conditions;
3. The Company will not publish any Personal Data related to User's purchase of Company's tokens without User's prior written consent.
4. The Company will not sell or rent Personal Data to third parties.
5. The Company will not provide Personal Data of Users to any other Website users or third parties herein without consent or direction of the Users.

4. RETAIN INFORMATION

4.1. The Company will retain Personal Data of Users for as long as necessary to provide services and as necessary to comply with legal obligations, resolve disputes and enforce Company's policies.

4.2. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, the Company will keep records containing Personal Data of Users as required by applicable laws and regulations.

4.3. The Company may rectify, replenish or remove incomplete or inaccurate information at any time and at its own discretion. 5.4. The Company may retain Personal Data of Users for as long as they possess Company's tokens and / or use the Website. Moreover, Personal Data of Users may be hold beyond the above-mentioned period till it is indispensable for the Company to have relevant information to respond to any issues that may arise later.

5. SECURITY

The Company uses relevant electronic and procedural safeguards to protect the privacy of the information the Users provide to the Company from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Please note that the Company is not liable for the security of any data Users are transmitting over the Internet or third-party content.

6. LINKS TO OTHER WEBSITES

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Site and the Service. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

7. CHANGES TO OUR PRIVACY POLICY

The Company reserves the right to change this policy and our Terms of Service at any time. We will notify you of significant changes to our Privacy Policy by sending a notice to the primary email address specified in your account or by placing a prominent notice on our site. Significant changes will go into effect 30 days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the Site and this privacy page for updates.

8. CONTACT US

If you have any questions regarding this Privacy Policy or the practices of this Site, please contact us by sending an email to contact@finminity.com

Last Updated: This Privacy Policy was last updated on 01-Sep-2020.