

PRIVACY POLICY

Last Updated: 02th October 2018

Please read carefully this Privacy Policy as it affects your obligations and legal rights.

This Privacy Policy is an independent legal document. Your rights and obligations when you use the Website (bitonmarket.io) and/or acquire BITON Tokens (BTMT) are also defined by the following documents (agreements): Token Purchase Agreement; Disclaimer; any other terms we let you know about. This Privacy Policy may contain links to any document listed above. The absence of one document or all of the listed documents doesn't affect the validity of this Privacy Policy.

SECTION 1 – GENERAL CONDITIONS

Our Privacy Policy governs the privacy terms of using the Website (bitonmarket.io) and/or participation in BITON MARKET project, including acquiring BITON Tokens (BTMT), general rules of User's Personal Data collection, processing, distribution, use and keeping by the Website Owner. Any terms not defined in our Privacy Policy, have the meaning as specified in Our Token Purchase Agreement and/or Disclaimer.

We follow all legal requirements to protect your privacy. Our Privacy Policy is a legal statement that explains what information of yours we will collect when you use the Website (bitonmarket.io) and/or acquire BITON Tokens (BTMT), how the information will be used, and how we will share and protect the information.

EACH USER MUST CAREFULLY READ AND COMPLY WITH THIS POLICY.

By using the Website (bitonmarket.io) and/or acquiring BITON Tokens (BTMT) you confirm that you agree to these Terms of Our Privacy Policy. If you do not agree with this Privacy Policy in general or any part of it, you should withhold from using the Website (bitonmarket.io) and/or acquiring BITON Tokens (BTMT).

You also agree that any information about you, collected by Us is transferred with your consent.

You provide and guarantee to us the right to process your personal data, including the right to perform the following actions to process your personal data (fully or partially in an

automated system): storing, registration, changing, restoring, and removing. Also you agree that your personal data is included in the personal data base and any additional notification is not required.

SECTION 2 – DEFINITIONS

2.1. In this Privacy Policy the following terms have meanings as described in the Definition section below:

2.1.1. “Website” shall mean the website maintained at bitonmarket.io;

2.1.2. “Personally identifiable information” (hereinafter – “Personal Information” or “Personal Data”) shall mean any information that can be directly associated with a specific person and can be used to identify that person (including the information about your activities, such as information about your usage of the Application, when directly linked to personally identifiable information, including automatically collected). We do not consider Personal Data to include information that has been anonymized so that it does not identify a specific User.

2.1.3. “Controller” (data controller) means a legal person, which determines the purposes and means of the processing of personal data.

2.1.4. “Processor” means a natural or legal person, which processes personal data on behalf of the Controller.

2.1.5. “Website Owner” (“We”, “Us” or “Our”) means a legal person (entity) – BITON MARKET OÜ (BITON MARKET LLC), which owns the exclusive rights for the objects of intellectual property – the Website. BITON MARKET OÜ is registered in compliance with the requirements of the Republic of Estonia legislation. The legal address of BITON MARKET OÜ is – Laki tn 30-302-3 PK/ruum, Mustamäe linnaosa, Tallinn, Harju maakond, 12915.

2.1.5.1. BITON MARKET OÜ is also a legal person, which determines the purposes and means of the processing of personal data and which processes personal data. Accordingly BITON MARKET OÜ is Controller and Processor in the meaning which is specified in paragraphs 2.1.3. and 2.1.4. of this Privacy Policy. However, there is also can be the other person who processes personal data on behalf of BITON MARKET OÜ as a Controller.

2.2. The other terms and notions used in this Policy shall be understood in accordance with Our Token Purchase Agreement and/or Disclaimer, unless other specified in this Privacy Policy.

SECTION 3 - INFORMATION WE COLLECT AND PROCESS

3.1. The User hereby expressly consents to provide to Us, immediately upon Our notice of request, information (including Personal Data) that We, in Our sole discretion, deem to be required to maintain compliance with any law, regulation or policy. This includes, but is not limited to, passports, government identification cards, driver's licenses, utility bills, and other category of documents for address proofing, your photo for proof.

3.2. The above mentioned documentation, described in paragraph 3.1., may be requested by the Website Owner prior to activating your account on the Website and/or any services, available through the Website. Any doubts as to validity, authenticity and genuineness of the documents, provided by you shall be considered a valid reason to refuse you access to Our services and Website.

3.3. The User, You hereby expressly consents, represents and warrants that any and all information provided to Us is valid, current, complete and accurate.

3.4. Personal Data Collected from all the Users, including non-registered Users. We collect the Personal Data from running the Website and use information, provided to Us by you, sent to Us by your computer, mobile phone, or other access device, which may include Your ETH (public Ethereum address) or other similar address, IP address, email address, device information including, but not limited to, identifier, name, and type, operating system, mobile network information and standard web log information, such as your browser type, and the pages you accessed on Our Website. When you use a location-enabled device with Our Website and products, we may collect geographical location data or use various means to determine the location, such as sensor data from your device that may, for instance, provide data on nearby cell towers and Wi-Fi access spots. However, we will not release your Personal Data of such kind to any third party without your consent, except as set forth in this Privacy Policy.

3.5. Personal Data Collected from Presale and Token Sale participants. If you participate as a buyer in Our Presale and/or Token Sale, in addition to the information noted in the paragraph 3.4. We may collect and store the following types of Personal Data, scanned copy of documents and information contained in these documents: first name, surname, email, password, address (city, street, building, zip code), phone number, email, state of citizenship, state of residence passports, government identification cards, driver's licenses, utility bills, and other category of documents for address proofing, your photo for proof.

3.6. We also collect and store such information as: User requests in support regarding the work of the Website and its related services, and other issues as well as similar texts of the User requests.

3.7. We reserve the right to request from you additional information (such as a date of birth, passport number, numbers that you may use or have registered with your local tax authority, or other Personal Data which can be used for personal identification purposes and that may be required to comply with applicable laws) so that We can verify your identity or address before permitting you to use our Website and acquire BITON Tokens (BTMT). We may also obtain information about you from third parties such as identity verification services (“Telegram Passport” and others) and/or AML/KYC service providers.

3.8. When you access the Website or use Our products or services We (or Google Analytics or similar service provider on our behalf) may place small data files called cookies on your computer or other device. We use these technologies (as well as other similar technologies) to recognize you as our User; customize our Website and advertising; measure promotional effectiveness and collect information about your computer or other access device to mitigate risk, help prevent fraud, and promote trust and safety. You may control the use of cookies within your internet browsers’ settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of our Websites and services may be impaired.

3.9. YOU AGREE THAT YOUR PERSONAL DATA MAY BE PROCESSED AND STORED BY US OR OUR COUNTERPARTIES DURING THE PERIOD OF TIME THAT IS PRACTICALLY NECESSARY TO FULFILL THE AIMS AND PURPOSES OF BITON TOKENS PRESALE, TOKEN SALE, IMPLEMENTATION OF BITON_MARKET PROJECT AS A WHOLE.

SECTION 4 - HOW WE USE YOUR INFORMATION

We use the information we receive from you as follows:

4.1. We collect, process and store only the User’s Personal Data that we need for their proper using of the Website and/or for your acquiring BITON Tokens (BTMT). In particular, we use your Personal Data to:

- administer Our Website and provide services;

- to organize and conduct BITON Tokens presale, token sale, give you a certain number of BITON Tokens (BTMT) and implement (realize) BITON MARKET project;
- to develop new products and services;
- to personalize Our Website for you;
- to send you technical notices and support and administrative messages;
- to communicate with you about products, services, promotions, events and other news and information we think will be of interest to you;
- to monitor and analyze trends, usage and activities in connection with Our Website and services;
- to provide third parties with statistical information about Our Users (but those third parties will not be able to identify any individual User from that information);
- to detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Website Owner and others;
- to verify compliance with any terms and conditions governing the use of Our Website;
- to link or combine Personal Data We collect from or about you.

4.2. The Website Owner is data Controller and Processor. Upon instructions from the Website Owner other persons can also act as a Processor. In particular, other persons may process your Personal Data on behalf of the Website Owner if there is an objective Website Owner's need to control/process or store information at the Website Owner's counterparties (such as AML/KYC service providers) or agents.

SECTION 5 - PERSONAL DATA PROTECTION AND STORAGE

5.1. The Website Owner will do any and all efforts and actions prescribed by Applicable Law to store any of your Personal Data in secrecy by means of, including but not limited to firewalls and data encryption, physical access controls to Our data centers, and information access authorization controls (which are designed to comply with Applicable Law and regulations), authorization of access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities.

5.2. We store and process and may transfer your Personal Data to our servers in Amsterdam, where our facilities or our service providers are located. It may also be processed by staff

operating who work for Us or for one of Our service providers. Staff may be engaged in the fulfillment of Our services and/or the processing of your details and the provision of support services. By submitting your Personal Data, you agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Policy. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent than in your country. From time to time, the Personal Data may be also stored in other locations, and in such cases We will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

5.3. Although We require that Users provide an email address, We will not publish any Personal Data related to acquiring BITON Tokens (BTMT), without the prior consent of the User. We can contact the User via email regarding acquiring BITON Tokens (BTMT).

SECTION 6 - THIRD PARTIES

6.1. We may share your personal information with:

- service providers under contract who help with parts of our business operations;
- Our banking partners;
- companies that We plan to merge with or be acquired by (should such a combination occur, We will require that the newly combined entity follow these terms with respect to your Personal Data);
- third party identity verification services for fraud prevention purposes;
- law enforcement, government officials, or other third parties when We are compelled to do so by a subpoena, court order, or similar legal procedure; or We believe 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 Our policies;
- Our Personal Data processing counterparties or agents, hired by or cooperating with Us, whose services are required by Us from the practical point of view;
- other third parties only with your prior consent or direction to do so.

6.2. We will not provide your Personal Data to any other Website Users without your consent or direction.

SECTION 7 - INTEGRATING THIRD PARTY SERVICES AND LINKS TO OTHER WEBSITES

7.1. Our Website and services may, from time to time, contain links to and from the websites of Our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that We do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any Personal Data to these websites or use these services.

SECTION 8 - PROTECTING YOUR CHILD'S PRIVACY

8.1. Website and/or BITON Token sale are not designed for use by anyone under the age of 18 (and even over if the legislation of your jurisdiction provides acquiring the full dispositive legal capacity of a natural person over the age of 18), though we realize we may have a Child attempt to use the Website. If you are a Child, you should withhold from using the Website and/or acquiring BITON Tokens (BTMT). If you are a parent or guardian and believe your Child is using our Website, please contact us to remove your Child's account; we reserve the right to ask you for verification of your relationship to the Child before we honor such a request. If we discover that a Child has created an account on our Website, we will immediately delete the account as soon as we discover it, we will not use the information for any purpose, and we will not disclose the information to third parties. However, as parent of such a Child, you understand that you are legally liable for any transactions created by the Child.

SECTION 9 - RETAIN INFORMATION

9.1. In accordance with applicable laws and as needed to provide services to our Users, we may hold your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain your Personal Data for as long as your account is active. Moreover, your Personal Data may be hold beyond the abovementioned period till it is indispensable for Us to have relevant information to respond to any issues that may arise later. In accordance with the existing legislative requirements,

your Personal Data will not be stored by Us longer than the deadline which is determined by the goals and objectives (specified in SECTION 4 of this Privacy Policy) for which achieving we collect and process your personal data.

SECTION 10 - SECURITY

10.1. We use relevant electronic and procedural safeguards to protect the privacy of the information you provide to Us from loss, misuse, disclosure, alteration and destruction.

10.2. PLEASE NOTE THAT TRANSMISSION OF DATA OR INFORMATION (INCLUDING COMMUNICATIONS BY EMAIL) OVER THE INTERNET OR OTHER PUBLICLY ACCESSIBLE NETWORKS IS NOT ONE HUNDRED PERCENT SECURE. PLEASE NOTE THAT WE ARE NOT LIABLE FOR THE SECURITY OF ANY DATA YOU ARE TRANSMITTING (WHICH MEANS IN THE PROCESS OF DATA TRANSFERRING) OVER THE INTERNET OR OVER THE OTHER METHOD WHICH IS BEYOND OUR CONTROL (IN PARTICULAR, NETWORKS THAT PROVIDES INTERNET ACCESS).

SECTION 11 - PRIVACY POLICY UPDATES AND AMENDMENTS

11.1. We reserve the right to modify or amend this Privacy Policy at any time. You should review this Privacy Policy frequently. Your continued usage of the Website and/or services shall mean your acceptance of those amendments and updates.

SECTION 12 – CONTACT US

12.1. “How to remove all of Your Personal Data?”

You have right to require correction of your Personal Data, updating, complete removal or removal of incorrect and/or inaccurate data by sending Us an email to info@bitonmarket.io. Nevertheless, this request must comply with the aim of using Our Website and Our legal obligations.

12.2. “How to prohibit Personal Data processing if you are allow this before? How to get all of Your Personal Data collected by us?”

If you want to prohibit Personal Data processing or get all of your Personal Data collected by Us, you can send us require to email info@bitonmarket.io.

12.3. If you have any other questions concerning this Privacy Policy, please contact Us – info@bitonmarket.io.