

## PRIVACY POLICY

This Privacy Policy constitutes an agreement between DATAREUM LIMITED, a company registered in the United Kingdom with the company registration number 11238443 and registered office at 27 Old Gloucester Street, London, United Kingdom, WC1N 3AX ("**Company**" or "**us**" or "**we**" or "**our**") and you or the entity you represent ("you"). Please read this document carefully to be sure that you understand it. By viewing, accessing or using the Datareum website or by registering to take part in the Token Sale, you agree to this Privacy Policy as a binding legal agreement between you and us, without limitation or qualification.

Privacy is of utmost importance at Datareum. We recognize the significance of protecting information which is stored on our computers or is intended to be stored on our computers and which relates to an individual. The data we protect is the "Personal Data" which is any information relating to an identified or identifiable person, sometimes called a data subject, and have made protecting privacy and the confidentiality of Personal Data a fundamental component of the way we do business. This Privacy Policy informs you of the ways we ensure privacy and the confidentiality of Personal Data. We are compliant with applicable privacy laws in the countries in which we operate. This policy describes the information we gather, how we may use those Personal Data and the circumstances under which we may disclose such information to third parties.

### **Collecting of Personal Information**

The Company may collect personally identifiable information, which includes, but is not limited to, your name, email address, phone number, entity name, physical address, date of birth, government-issued photo identification or other identification, account numbers, gender, nationality, country of residence and cryptocurrency addresses. If you purchase the Companies' products, services and/or participate in the Datareum, Inc. ICO, we collect billing and credit card information. This information is solely used to complete the purchase transaction. The Companies may also collect anonymous demographic information, which is not unique to you, included but not limited to your age, gender, household income, political affiliation, race, religion, and business information. We may gather additional personal or non-personal information in the future.

Information about your computer hardware and software may be automatically collected by the Companies. This information can include, but is not limited to: your IP address, browser type, browser language, files accessed, pages viewed, errors generated, time zone, hardware model, operating system, domain name, device identifiers, mobile network information, device location, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Companies websites and apps.

Information that is communicated through the Companies' websites and apps is automatically collected. Please keep in mind that if you directly disclose identifiable information or personally sensitive data through the Companies' public message boards, this information may be collected and used by others.

### **Blogs and Forums**

The Companies provide the capacity for users to post information in blogs and forums for sharing information in a public space on the Companies websites and apps. This information is publicly available to all users of these forums and visitors to our websites and apps. The Companies encourages users to be cautious in disclosure of personal information in any public forums as the Companies are not responsible for the personal information users elect to disclose.

The Companies supports third party widgets such as Facebook and Twitter buttons on the Companies' websites and apps that allow users to share information on different platforms. These widgets may collect your IP address, pages you visit, and use cookies to enable widgets to function properly. The Companies are not responsible for your interactions with these widgets as they are governed by the privacy policy of the company providing them.

### **Links from the Companies' Websites and Apps**

Some pages of the Companies' websites and apps may contain external links. The Companies' encourage you to review the privacy statements of websites and apps you choose to link to from the Companies so that you can understand how those websites and apps collect, use and share your information. The Companies are not responsible for the privacy statements or other content on websites and apps outside of the the Companies websites and apps. The Companies encourage you not to provide personal information, without assuring yourselves of the Privacy Policy Statement of other websites and apps.

### **Use of your Personal Information**

The Companies collect and use your personal information to conduct the Datareum ICO, operate the Companies' websites and apps and deliver the services you have requested.

The Companies may also use your personally identifiable information to inform you of other products or services available from the Companies and its affiliates. The Companies may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

The Companies may sell, rent, or lease customer information to third parties for any purpose it deems necessary. The Companies may collect information about its users from third party sources.

The Companies may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (email, name, address, telephone number) is transferred to the third party.

The Companies may share data and personal information with our trusted third party partners, resellers, service providers and business partners to help provide the Companies' Services. The purpose for which the Companies may disclose your personal information or data to our trusted third parties may include, but are not limited to, data storage, database management, web analytics, payment processing, statistical analysis, sending you email or postal mail or providing customer support. All such third parties are prohibited from using your personal information except to provide these services to the Companies, and they are required to maintain the confidentiality and security of your personal information and comply with this Privacy Policy.

The Companies may share generic aggregated demographic information not linked to any personal information regarding visitors and users with our business partners, advertisers, and other affiliated third parties.

Usage details such as time, frequency, duration and pattern of use, features used and the amount of storage used will be recorded by the Companies in order to enhance user experience of the the Companies' websites, apps and services and to help provide users the best possible service.

The Companies may keep track of the websites, apps and pages our users visit within the Companies, in order to determine what the Companies' services are the most popular. This data is used to deliver customized content and advertising within the Companies to customers whose behavior indicates that they are interested in a particular subject area.

The Companies will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on the Companies or the sites; (b) protect and defend the rights or property of the Companies; (c) investigate any suspected illegal activity or potential violation of the Companies' Services terms and conditions and, (d) act under exigent circumstances to protect the personal safety of users of the Companies, or the public.

### **User Account Contents**

The Companies store and maintain files, documents, emails and other data stored in your user account. In order to prevent loss of data due to errors or system failures, the Companies keep backup copies of data including the contents of your user account. Files and data may remain on our servers after user account deletion or termination. The Companies may retain any customer data, personal information and any other data as necessary to comply with legal obligations, resolve disputes, and enforce company rights. The Companies assure the contents of user accounts will not be disclosed to anyone and will not be accessible to the Companies' employees except in circumstances specifically mentioned in this Privacy Policy and the Companies' Terms of Service. The Companies do not scan the contents of user accounts for serving targeted advertisements.

### **Use of Cookies**

The Companies affiliated websites and apps may use temporary and permanent "cookies" to help you personalize and enhance your online experience of the Companies' Services. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize the Companies' pages, or register with the Companies site or services, a cookie helps the Companies to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same website or app of the Companies, the information you previously provided can be retrieved, so you can easily use the the Companies' features that you customized.

Temporary cookies will be removed from your computer each time you close your browser. The Companies' affiliated websites and apps may store a permanent cookie in your computer or mobile device so that you will not be required to sign-in by providing complete login information each time you return to our websites or apps.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Companies' Services or websites and apps you visit. The Companies tie cookie information to your email address when you elect to remain logged in so as to maintain and recall your preferences within the website or app.

### **Accessing, Updating and Removing Personal Information.**

Upon request, the Companies will provide you with information about whether we hold any of your personal information. Users who wish to correct, update or remove any personal information including those from a public forum, directory or testimonial on our site may do so either by accessing their user account or by contacting the Companies' Customer Support Services at <https://www.dataareum.net/>. Such changes may take up to 48 hours to take effect. We respond to all enquiries within 30 days.

### **Children Under Thirteen**

The Companies do not knowingly collect personally identifiable information from children under the age of thirteen. If you are under the age of thirteen, you must ask your parent or guardian for permission to use this website or app.

### **Use and Disclosure of Personal Data**

Except as part of the sale of all or substantially all of the assets of Datareum (in which case you will be given prior notice), we will not use your Personal Data unless we have your consent. We will only use and/or disclose Personal Data internally in order to:

1. Understand and meet your needs and preferences;
2. Develop new and enhance existing service and product offerings;
3. Manage and develop our business and operations;
4. Carry out any purposes for which we have received your consent; and
5. Meet legal and regulatory requirements.

We also reserve the right to use aggregated Personal Data provided that those data do not relate to any individual.

Personal Data may be collected, stored and/or processed by third party service providers or by companies in the Datareum corporate family to perform functions on our behalf. All such third parties will be contractually bound to protect data in compliance with our policy.

Except where we are required by law to disclose Personal Data or are exempted from, released from or not subject to any legal requirement concerning the disclosure of Personal Data, we will require any person to whom we provide your Personal Data to agree to comply with our Privacy Policy in force at that time or requirements substantially similar to such policy. We will make reasonable commercial efforts to ensure that they comply with such policy or requirements, however, we will have no liability to you if any person fails to do so.

We shall require any third party, including without limitation any government or enforcement entity, seeking access to data we hold to have obtained a Court Order, or proof they are statutorily empowered to access your data and that their request is valid and within their power.

### **Processing**

We will process your Personal Data legally and fairly and not use it outside the purposes of which we have informed you. So far as we are able we shall ensure that all of your Personal Data is accurate and up to date.

### **Security of Your Personal Data**

We protect Personal Data with appropriate physical, technological and organizational safeguards and security measures. Your Personal Data comes to us via the internet which chooses its own routes and means whereby information is conveyed from location to location. As such we cannot give any warranty or assurance that the means where information is conveyed to us are safe, reliable or have integrity. We audit our procedures and security measures regularly to ensure they are being properly administered and remain effective and appropriate. Every member of Datareum is committed to our privacy policies and procedures to safeguard Personal Data. Our site has security measures in place to protect against the loss, misuse and unauthorized alteration of the information under our control. More specifically, our server uses SSL (Secure Sockets Layer) security protection by encrypting your Personal Data including credit card number, name and address to prevent individuals from reading these Data as it travels over the Internet. The length of time we retain Personal Data outside our back

up system varies depending on the purpose for which it was collected and used. This period may extend beyond the end of the particular relationship with us but only for so long as we are contractually bound to do so, or so far as is necessary for audit or other accounting purposes. When Personal Data are no longer needed we have procedures either to destroy, delete, erase or convert it to an anonymous form. We reserve the right to maintain your Personal Data as part of our standard back-up procedures.

### **Storage of personal data**

Data provided to Datareum is stored in accordance with applicable laws of the jurisdiction of the data subject, at secure locations in the EU. Datareum has ensured that appropriate security standards are in place regarding the safeguarding, confidentiality and security of Data. In regard to data subjects resident in the EU, Datareum, where required, registers with appropriate national data protection / information protection authorities. Datareum also ensures that data is held in a manner that meets the requirements of any national law of any member state of the European Union giving effect to Directive 95/46/EC. The Directive provides obligations on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

### **Withdrawal of Consent**

Except as required or enabled by law (including, for the avoidance of doubt, the laws of the member states of the European Union we have mentioned above), we will not use or disclose your Personal Data for any purpose for which you refuse consent or later withdraw your consent. If you withdraw consent, you agree that in spite of this withdrawal, we may continue to use those Personal Data previously provided to us to the extent that we are contractually or otherwise legally obliged to do so and to the extent necessary to enforce any contractual obligation you may have towards Datareum or in any other way permitted by law. You also understand that although you can use our site for some purposes without providing Personal Data, we need certain Personal Data, including data linked to payment or involving an ongoing relationship with Datareum or our partners. If you refuse to provide us with Personal Data we require or later withdraw your consent, we may no longer be able to provide you with certain services.

### **Acceptance**

By using this site, you signify your agreement to this Policy. Datareum reserves the right to change this Policy at any time. Any changes will be posted so that you are always aware of what information we collect, how we use it and under what circumstances we disclose it.