

Totalcoin PRIVACY POLICY

Last updated: March 15, 2018

Totalcoin, Ltd, and Totalcoin Limited ("TCN", "we", "us" and "our") respect and protect the privacy of visitors to our websites and our customers who use our services. To ensure transparency, this Privacy Policy describes our information handling practices when you access content we own or operate on the websites located at totalcoin.io, or any other websites, pages, features, or content we own or operate (collectively, the "Site(s)") and/or when you use the Totalcoin mobile app and related services (referred to collectively hereinafter as "Services").

Please take a moment to read this Privacy Policy carefully. If you have any questions about this Privacy Notice, please contact us at policy@totalcoin.io

ACCEPTANCE OF PRIVACY POLICY

By accessing and using our Services, you signify that you have reviewed the terms of this Privacy Policy. Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below. TCL may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. These notices may supplement or clarify TCL's privacy practices or may provide you with additional choices about how TCL processes your data.

If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our Services.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time, and when required by law, we will notify you of changes to this Privacy Policy. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our Services prior to the change becoming effective.

PERSONAL INFORMATION WE COLLECT

Personal information is data that can be used to identify you directly or indirectly, or to contact you. Our Privacy Policy covers all personal information that you voluntarily submit to us and that we obtain from our partners. This Privacy Policy does not apply to anonymised data, as it cannot be used to identify you.

You may be asked to provide personal information anytime you are in contact with any TCL companies. The TCL companies may share your personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, and content (see the section below).

Except as described in this Privacy Policy, TCL will not give, sell, rent or loan any personal Information to any third party.

PERSONAL INFORMATION COLLECTED

We collect personal information to provide you with our Services. When we require certain personal information from users it is because such information is relevant for specified purposes. Any information you provide to us that is not required is voluntary.

For example, we collect personal information when you use or request information about our Services, subscribe to marketing communications, request support, complete surveys, or sign up for a TCL event or webinar. We may also collect personal information from you

offline, such as when you attend one of our events, or when you contact customer support. We may use this information in combination with other information we collect about you.

In addition, we may collect personal information disclosed by you on our message boards, chat features, blogs and our other services to which you are able to post information and materials. Any information that is disclosed in those forums becomes public information and may therefore appear in public ways, such as through search engines or other publicly available platforms, and may be "crawled" or searched by third parties. It could also be read, collected or used by other users to send you unsolicited messages. Please do not post any information that you do not want to reveal to the public at large.

You are free to choose whether to provide us with the types of personal information described below, but we may not be able to serve you as effectively or offer you some or all of our Services when you choose not to share certain information with us.

Here are some examples of the types of personal information TCL collects and how we may use it:

- When you create an account or use TCL Services, we, or our affiliates' vendors acting on our behalf may collect the following types of information: your name, date of birth, driver number ID, personal ID, address, phone, email, full bank account details and/or credit card numbers that you link to your Totalcoin Account or input when you use TCL Services. TCL will use this information to fulfill your requests and provide the relevant Services.
- If you seek permissions to raise Digital Currency buy and sell limits associated with your TCL Account, we may require you to provide additional information which we may use in collaboration with service providers acting on our behalf to verify your identity or address, and/or to manage risk. This information may include your date of birth, taxpayer or government identification number, a copy of your government-issued identification, a photo of you, or other personal information. We may also obtain information about you from third parties such as credit bureaus and identity verification services.

- Whenever you contact us or respond to our communications (e.g., email, telephone, written), we receive your contact information and any other personal information you choose to provide us. TCL will use such information to fulfill your requests or to provide Services.
- You may choose to provide us with access to certain personal information stored by third parties such as social media sites (such as Facebook and Twitter). The information we have access to varies by site and is controlled by your privacy settings on that site and your authorisation.

HOW PERSONAL INFORMATION IS USED

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customised experience. In general, we use personal information to create, develop, operate, deliver, and improve our Services, content and advertising, and for loss prevention and anti-fraud purposes. Examples of how we may use this information include:

- To provide you with TCL Services and customer support that you request.
- To process transactions and send notices about your transactions.
- To verify your identity by comparing your personal information against third-party databases.
- To send administrative or account-related information to you.
- To better understand our customers and end-users and the way they use and interact with TCL-owned or -operated websites, mobile apps, and Services.
- To provide a personalised experience, and implement the preferences you request.
- To customise, measure, and improve TCL Services and the content and layout of our website and applications.
- To enhance security, prevent fraud, monitor and verify identity or service access, combat spam or other malware or security risks.

- To deliver targeted marketing, service update notices, and promotional offers based on your communication preferences (where this in accordance with the law).
- To interact with you on third party social networks (subject to that network's terms of use).
- To communicate with you about our events or our partner events.
- To prevent and investigate potentially prohibited or illegal activities, and/or violations of our posted user terms.
- To resolve disputes, collect fees, and troubleshoot problems.
- To comply with legal obligations.
- To enforce our agreements with third parties.
- For quality control and staff training.

We will not use your personal information for purposes other than those purposes we have disclosed to you, without your permission. From time to time we may request your permission to allow us to share your personal information with third parties. You may choose not to have your personal information shared with third parties where we rely on consent as the lawful basis for processing your personal information. You may also choose not to allow us to use your personal information for any purpose that is incompatible with the purposes for which we originally collected it or subsequently obtained your authorisation. If you choose to limit the use of your personal information, certain features or TCL Services may not be available to you.

INFORMATION FROM THIRD PARTY SOURCES

From time to time, we may obtain information about you from third party sources as permitted by applicable law, such as public databases, credit bureaus, ID verification partners, resellers and channel partners, joint marketing partners, and social media platforms.

- **Public Databases, Credit Bureaus & ID Verification Partners:** We obtain information about you from public databases and ID verification partners for

purposes of verifying your identity. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. The legal basis for such processing is to comply with our legal obligations, such as anti-money laundering laws. In some cases, we may process additional data about you based on public interest grounds to ensure our Services are not used fraudulently or for other illicit activities.

- **Resellers, Channel Partners, Joint Marketing Partners, and Social Media Platforms:** We collect information about your publicly available social media profile, interests or preferences, and page-view information from some business partners with which we operate co-branded services or joint offerings. There are multiple purposes for collecting this information. First, we process such information under a legitimate interest to better understand you and/or maintain and improve the accuracy of the records we hold about you as well as to position, promote or optimise our Services. In addition, we may also use this information in conjunction with your browsing habits / preferences (as obtained from our data partners) and your contact details, professional information and TCN transaction history to deliver targeted advertising and marketing to you, where permitted by applicable law and in accordance with your advertising / marketing preferences. Second, we also process such information to provide support to you as part of our contractual obligations to you. Lastly, we process such information in the public interest because it helps us monitor, prevent and detect fraud.

Once we obtain such information from third parties, we do not subsequently share it with any other third parties except as described in this Privacy Policy. This information is shared with TCN's processors and corporate group as necessary to perform the Services.

COLLECTION & USE OF INFORMATION COLLECTED AUTOMATICALLY

We receive and store certain types of information automatically, such as whenever you interact with the Sites or use the Services. This information does not necessarily reveal your identity directly but may include information about the specific device you are using, such as the hardware model, operating system version, web-browser software (such as Firefox, Safari, or Internet Explorer) and your Internet Protocol (IP) address/MAC address/device identifier.

For example, we automatically receive and record information on our server logs from your browser, including how you came to and used the Services; your IP address; device type and unique device identification numbers, device event information (such as crashes, system activity and hardware settings, browser type, browser language, the date and time of your request and referral URL), broad geographic location (e.g. country or city-level location) and other technical data collected through cookies, pixel tags and other similar technologies that uniquely identify your browser. We may also collect information about how your device has interacted with our website, including pages accessed and links clicked. We may use identifiers to recognise you when you arrive at the Site via an external link, such as a link appearing on a third party site.

HOW WE PROTECT AND STORE PERSONAL INFORMATION

We understand how important your privacy is, which is why TCL maintains (and requires its service providers to maintain) appropriate physical, technical and administrative safeguards to protect the security and confidentiality of the personal information you entrust to us.

For example, we use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to personal information only for those employees who require it to fulfill their job responsibilities. Full credit card data is securely transferred and hosted off-site by a

payment vendor in compliance with Payment Card Industry Data Security Standards (PCI DSS). This information is not accessible to TCL or Totalcoin staff.

However, we cannot guarantee that loss, misuse, unauthorised acquisition, or alteration of your data will not occur. Please recognise that you play a vital role in protecting your own personal information. When registering with our Services, it is important to choose a password of sufficient length and complexity, to not reveal this password to any third-parties, and to immediately notify us if you become aware of any unauthorised access to or use of your account.

Furthermore, we cannot ensure or warrant the security or confidentiality of information you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us.

HOW WE SHARE PERSONAL INFORMATION WITH OTHER PARTIES

We take care to allow your personal information to be accessed only by those who really need to in order to perform their tasks and duties, and to share with third parties who have a legitimate purpose for accessing it. TCL will never sell or rent your personal information. We will only share your data in the following circumstances:

- We share your information with third party identity verification services in order to prevent fraud. This allows TCL to confirm your identity by comparing the information you provide us to public records and other third party databases.
- We may share your information with service providers under contract who help with parts of our business operations such as bill collection, marketing, and technology services. Our contracts require these service providers to only use your information in connection with the services they perform for us, and prohibit them from selling your information to anyone else.
- We share your information with financial institutions with which we partner to process payments you have authorised.

- We may share your information with companies or other entities that we plan to merge with or be acquired by. Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. You will receive prior notice of any change in applicable policies.
- We may share your information with any third parties where required to do so by applicable law or any court or other authority to which we are subject in any jurisdiction; or we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of the TCL User Agreement and any other applicable policies.
- We may share your information with other third parties with your consent or direction to do so.

RETENTION OF PERSONAL INFORMATION

TCL will retain your personal data for as long as is necessary for the purposes of our business relationship with you, to perform our contractual obligations to you, or if longer, as required for legal and regulatory purposes.

We have established internal policies for the deletion of data from customer accounts following termination of a customer's subscription to the Service.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

While Totalcoin Limited is based in Hong Kong, our service providers may store, transfer, and otherwise process your personal information in countries outside of the country of your residence.

CHILDREN'S PERSONAL INFORMATION

We do not knowingly request to collect personal information from any person under the age of 18. If a user submitting personal information is suspected of being younger than 18 years of age, TCL will require the user to close his or her account and will not allow the user to continue buying or selling digital currencies. Please notify us if you know of any individuals under the age of 18 using our Services so we can take action to prevent access to our Services.

CHANGES TO THIS PRIVACY POLICY

We may periodically post changes to this Privacy Policy on this page. We encourage you to visit this page often. When required by law, we will notify you of any changes to this Privacy Policy.

HOW TO CONTACT US

If you have questions or concerns regarding this Privacy Policy, or if you have a complaint, you should first contact us at info@totalcoin.io, or by writing to us at:

Totalcoin Limited

....