

# RUON TOKEN SALE PRIVACY POLICY

Last Updated: February 2018

## 1. About this Privacy Policy

At Ruon we are committed to keeping your information safe and secure. Please read this privacy policy (“**Privacy Policy**”) so that you understand your rights in relation to this information, including how your information will be collected, used and processed.

Ruon Trading Limited is a company incorporated in under the laws of Malta, with registration number C 88113 having its registered office situated at 4, A. De Saavedra Street, Naxxar, NXR 2232, Malta (hereinafter “**Ruon**”, “**we**”, or “**us**” or “**Our**”). For the purposes of the data protection laws of the European Economic Area (“**EEA**”), the data controller is Ruon Trading Limited and may be contacted as set out in clause 14 below.

In providing you with our website <http://www.ruon.io> (our “**Website**”) including our related products and services made available by us and this Website (together the “**Services**”) or when you otherwise interact with us, we naturally collect information about you. We will only collect and use personal data in ways that are described here and in a way that is consistent with our obligations and your rights under the law.

Our Services include the Website and any services or products made available through the Website that will issue ERC-20 Standard digital tokens called Ruon Tokens.

This Privacy Policy sets out what we collect, how we use that information, who we might share it with, and the steps we take to make sure it stays private and secure. This Privacy Policy only applies to your use of Our site. Our site may contain links to other websites. Please note that we have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them and see clause 8 below.

For Users within the European Economic Area (“**EEA**”) personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “**GDPR**”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

In every case (meaning also outside fo the EEA) personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

Additionally, references in this notice to your “**personal data**” describes information that can be associated with a specific person and can be used to identify that person (including information about your activities, such as information about your use of the Website and Services, when directly linked to personal data, including automatically collected). Anyone who uses the Website or Services, shall comprise: (a) any person, who uses the Website or its Services, without prior registration and authorization (“**You**”); (b) any person, who uses the Website or its Services, with prior registration and authorization (“**User**”); and (c) any person, who uses the Website or its Services to purchase Ruon Tokens (“**Buyer**”), together “**you**”.

**Please read the following information carefully to understand our practices regarding your personal data and usage information and how we will use it.**

By continuing to use our Website, creating an account or purchasing Ruon Tokens, you acknowledge that you have read, understood and accepted the information described in this Privacy Policy. If you do not agree with this Privacy Policy in general or any part of it, you should not access the Website, Services or purchase Ruon Tokens.

## 2. Types of Personal Information We Use

We will collect and use the following information about you:

- **Information you give us.** This is information about you that you give us by filling in forms on the Website, completing pre-sale documentation or by corresponding with us. The information you give us includes your name, address, e-mail address and phone number. EEA Users: This information is processed pursuant to our contract with you.
- **Information we collect about you.** With regard to each of your visits to the Website we will automatically collect the following information. EEA Users: This information is processed on the basis of our legitimate interests to secure and protect the integrity of the services.
  - *technical information:* including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
  - *Website visit information:* including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page;
  - *location information:* when you use a location-enabled device to access the Website or Services, 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.

We collect this information when you visit our Website, even if you have not registered for the Services.

Additionally we may collect:

- business information, payment information including card details; bank details.
- **Information required to comply with governmental rules, anti-money laundering (“AML”) or “know-your-customer” (“KYC”) policies.** We may require you to provide information including scanned or depicted documents from you, such as a photo of your passport or other identity card to show proof of identity as well as documentation that evidences your proof of address or documents or online database information to confirm your identity. We also may collect information about your device for fraud prevention, KYC or AML purposes and other information as may be required by terms of Ruon Token Sale Terms and Conditions. Such information will only be necessary if requested and may be required prior to activation of your account. EEA Users: This information is processed pursuant to our obligations under applicable law.

### 3. How We Use Your Personal Information

We will use the information in the following ways:

- **Information you give to us.** We use this information:
  - to set up and manage your account on the Website;
  - distribute and account Ruon tokens;
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - to notify you about changes to our service.
  - Personalising and tailoring you experience on our site;
  - Managing payments;
  - Communicating with you;
  - Suppling information by email or post (you may opt out at any time through the unsubscribe provision or by contacting us at [caroline@ruon.io](mailto:caroline@ruon.io) and asking;
- **Information we collect about you.** We use this information:
  - to administer and manage the Website and Services;
  - for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to prevent potentially prohibited or illegal activities, and enforce our service terms; and
  - detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of Ruon and others.
- With your permission and/or where permitted by law, may also use your personal data for marketing purposes, which may include contacting you by email **AND/OR** telephone **AND/OR** text message **AND/OR** post with information, news, and offers on our products. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.
- **Information we receive from others source or that is required to comply with AML or KYC policies.** We are required to compare the personal data you provide with third party databases in order to verify its accuracy and confirm your identity to comply with relevant AML regulations and KYC regulations. We will use your personal data and other information we collect to detect, investigate and prevent fraudulent transactions and other illegal activities, develop new products and services and to verify compliance with the Ruon Token Sale Terms and Conditions. Where we collect location information, we may do so to ensure compliance with applicable laws including AML and KYC rules. This may include the blocking from certain countries where the usage of our Website, Services and buying of Ruon Tokens are prohibited by that country. For more information refer to our Terms and Conditions at <https://ico.ruon.io/privacy>

### 4. Cookies

We use cookies and other similar technologies (e.g., web beacons, flash cookies, etc.,) ("**cookies**") to enhance your experience using the Website and Services. Cookies may be either "persistent" cookies or "session" cookies. For more information about cookies, please refer to our **{Cookies Policy}** <https://ico.ruon.io/cookies>

## 5. Children

Our Website and Services are not intended for children. Children must not use the Website or Services for any purpose. We will not knowingly allow anyone under 18 to register for our Website or Services or provide any personally identifying information. If you are under 18, please do not sign up to use our Website or Services or provide any information about yourself through the Website or Services.

## 6. Where We Store Your Data

We store and process your information in Germany, Singapore, Hong Kong, Japan, Philippines and USA. Your personal data is also processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff are engaged in, among other things, the fulfilment of your token order, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy. The personal data is transferred to staff in these countries by way of the European Commission's model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses), pursuant to Decision 2004/915/EC (in the case of transfers to a controller) and Decision 2010/87/EU (in the case of transfers to a processor).

## 7. How we share your personal data

We share your personal information with selected third parties in and outside your country, including:

- **third party service providers and partners** including infrastructure hosting providers (in order to store data), identity verification service and investor status verification services (in order to facilitate the set-up of your account in accordance with applicable law), payment services (in order to process payments), and token accounting services (in order to verify, monitor and secure token sales);
- **related group companies**. We share information with these entities in order to:
  - help detect and prevent potentially illegal acts and violations of our policies;
  - allow you to leverage information that you have provided to us to more efficiently set-up accounts with group companies and to allow you to use the products and services they provide that are supplied in connection with, or using, the Ruon Token; and
  - guide decisions about our products, services and communications;
- **law enforcement agencies, public authorities or other judicial bodies and organisations**. We disclose information if we are legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:
  - comply with a legal obligation, process or request;
  - enforce our terms of service and other agreements, policies, and standards, including investigation of any potential violation thereof;
  - detect, prevent or otherwise address security, fraud or technical issues; or

- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction); and
- **a third party that acquires all or substantially all of us or our business.** We will disclose information to a third party in the event that we sell or buy any business or undergo a merger, in which case we will disclose your data to the prospective buyer of such business. We will also disclose information to a third party if we sell, buy, merge or partner with other companies or businesses, or sell some or all of our assets. In such transactions, user information may be among the transferred assets.

## **8. Links to Third Party Websites**

We may provide links to other third party websites as a convenience to you (collectively, the “**Third Party Websites**”). Please exercise care when visiting any Third Party Websites. The Third Party Websites have separate and independent privacy policies, notices and terms of use which govern your use of such websites and their use of any information they collect. We recommend you read these policies carefully. We disclaim all liability for personal information you provide to any Third Party Websites.

## **9. Security**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of the information transmitted to our site; any transmission of your information is at your own risk.

## **10. Your Rights**

You may access, review and edit your personal data at any time by logging in to your account using your credentials.

To disable your account and remove your personal information completely, please email us at with a request. This request must comply at all times with our Terms and Conditions.

### **Rights of users located within the EEA**

You have certain rights in relation to the personal information we hold about you. Some of these only apply in certain circumstances as set out in more detail below. We also set out how to exercise those rights. Please note that we will require you to verify your identity before responding to any requests to exercise your rights. We must respond to a request by you to exercise those rights without undue delay and at least within one month (although this may be extended by a further two months in certain circumstances). To exercise any of your rights, please contact us at [caroline@ruon.io](mailto:caroline@ruon.io)

### **Access, Correction & Deletion**

You have the right to know whether we process personal information about you, and if we do, to access personal information we hold about you and certain information about how we use it and who we share it with (the right to be informed). You can access and correct your personal information by logging into your account on the Website at any time (the right to access and to rectification). If we hold personal information about you that is not available by accessing your account, you can make a request for such information to [caroline@ruon.io](mailto:caroline@ruon.io) or certain information (such as your IP address) you also have the right to request that such information be deleted (the right to be forgotten). To the extent you are not able to deletion your personal

information by logging into your account on the Website, please contact us at [caroline@ruon.io](mailto:caroline@ruon.io) You have the right to object to our using your data for a particular purpose and the right to withdraw consent. This last means that if we are relying on your consent as the legal basis for processing your personal data you are free to withdraw your consent at any time.

### ***Portability***

You have the right to receive a copy of certain personal information we collect from you in a structured, commonly used and machine-readable format. The relevant personal information is information you provided for the purposes of performing our contract with you (for example, your email address and transaction data). You can make a request for such information to [caroline@ruon.io](mailto:caroline@ruon.io) at any time.

### ***Objection & Restriction of Processing to Storage Only***

You have a right to require us to stop processing the personal information we hold about you, other than for storage purposes, in certain circumstances. Please note, however, that if we stop processing the personal information, we may use it again if there are valid grounds under data protection laws for us to do so (e.g., for the defence of legal claims or for another's protection). You may request we stop processing and just store the personal information we hold about you where:

- you believe the personal information is not accurate for the period it takes for us to verify whether it is accurate; or
- we wish to erase the personal information as it is no longer necessary for our purposes but you require it to be stored for the establishment, exercise or defence of legal claims.

Separately, at any time you have the right to object to our processing of personal information about you in order to send you marketing and related communications, including where we build profiles for such purposes and we will stop processing the personal information for that purpose. If you object to certain processing please contact us at [caroline@ruon.io](mailto:caroline@ruon.io)

**If we have collected your information by obtaining your consent, you also have the right at any time to withdraw that consent by contacting us, provided however that, in case you remain to be the Buyer, you will not be able to withdraw your consent for all the data in general, denying us to hold any your information at all.**

Please email us at [caroline@ruon.io](mailto:caroline@ruon.io) for any questions or to exercise your rights.

## **11. Retention of information**

We will retain your personal information as described below (except if otherwise required to be retained by applicable law):

- **Information you give us** (Name, address, e-mail address and phone number). This information is retained for the period for which you hold your account.
- **Information we collect about you** (technical device information, website visit and browsing information, location information). This information is retained for the period for which you hold your account and then deleted within 30 days of a lawful, valid request to exercise your legal rights to deletion of such information.

- **Information we receive from others source or that is required to comply with AML or KYC policies** (financial and credit card information, copies of personal identification documents (including copies of your passport and/or driver license) and photograph). This information is retained for the period for which such information must be retained under applicable law in the countries in which we operate.

If you have any cause for complaint about our use of your personal data you have the right to lodge a complaint with the Information Commissioners Office at <https://idpc.org.mt/en/Pages/Home.aspx> We would welcome the opportunity to first resolve your concerns ourselves however so please contact us at [caroline@ruon.io](mailto:caroline@ruon.io)

## **12. Marketing**

We will only disclose your information to any third party for marketing with your consent. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by visiting your preferences on the Website.

## **13. Changes to this Policy**

We may amend this policy at any time by posting a revised version on our Websites. The revised version will be effective at the time we post it. We encourage you to periodically check this page for the latest information on our Privacy Policy.

## **14. Contact us**

If you have questions concerning this Privacy Policy, or you notice any bugs, errors or violations please feel free to send us an email at [caroline@ruon.io](mailto:caroline@ruon.io)