

# TRUEPLAY.IO

## PRIVACY POLICY

**Last Updated:** April 05, 2018

Please read carefully this Privacy Policy (“Policy”) as it affects your obligations and legal rights. This Privacy Policy is an integral part of the TruePlay Terms and Conditions, available on the Website. Therefore, if you do not agree with this Privacy Policy, you must not access or use the Website or buy TruePlay Tokens (TPLAY).

### 1. DEFINITIONS

“**Personal Information**” (also referred to as “**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 use of the Website, 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.

The other terms and notions used in this Policy shall be understood in accordance with the TruePlay Terms and Conditions, unless otherwise specified in this Privacy Policy.

### 2. GENERAL PROVISIONS

- 2.1. This Policy sets forth the general rules of User’s Personal Data collection, processing, distribution, use and keeping by the Company.
- 2.2. This Policy is effective at the time the User begins using the Website. It is understood and presumed per se that by the fact of the Website use and TruePlay Tokens (TPLAY) purchase or by providing Us the Personal Data directly on our request, the respective User 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 withhold from using the Website and/or purchase of TruePlay Tokens (TPLAY).
- 2.3. This Policy is an inalienable part of TruePlay Terms and Conditions. In terms not regulated by this Policy, the TruePlay Terms and Conditions shall apply to the relationships that arise hereunder.

### 3. PERSONAL DATA COLLECTION AND PROCESSING

- 3.1. The User hereby expressly consents to provide to Us, immediately upon our notice of request, any information (including any 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, driver’s licenses, utility bills, photographs of You, government identification cards, confirmation of proceeds sources or sworn statements.

- 3.2. The above mentioned documentation, described in paragraph 3.1., may be requested by the Company 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 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, BTC-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 herein.
- 3.5. **Personal Data Collected from Early-Sale and Token Sale participants.** If You participate as a buyer in Our Early-Sale and/or Token Sale, We may collect and store the following types of Personal Data: contact information – Your name, address, phone, email and other similar information. 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 acquiring TruePlay Tokens (TPLAY). We may also obtain information about You from third parties such as identity verification services and/or KYC service providers.
- 3.6. 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 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.
- 3.7. **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 TruePlay Early-Sale and Token Sale.**

#### 4. PERSONAL DATA USE

4.1. We collect from the Users only the Personal Data that we need for their proper use of the Website or for purchase of TruePlay Tokens (TPLAY). In particular, we use Your Personal Data to:

- administer our Website and provide services;
- develop new products and services;
- personalize our Website for You;
- send You technical notices and support and administrative messages;
- communicate with You about products, services, promotions, events and other news and information we think will be of interest to You;
- monitor and analyze trends, usage and activities in connection with our Website and services;
- 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);
- detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Company and others;
- link or combine Personal Data We collect from or about You; and
- verify compliance with the terms and conditions governing the use of our Website (including monitoring private messages sent through the Website private messaging service).

4.2. The Company is the only data controller and processor, except for the cases when there is an objective Company's need to control/process or store information at Company's counterparties or agents.

## **5. PERSONAL DATA PROTECTION AND STORAGE**

5.1. The Company 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.

## **6. THIRD PARTIES**

6.1. We will not share Your Personal Data with any third parties other than our respective identity verification partners. We also reserve the right to share Your Personal Data with:

- 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 identification service providers 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.
- 6.3. Our 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.

## **7. AML/KYC**

7.1. We are committed to implementing and maintaining the highest standards of Know Your Customer (KYC) and Anti Money Laundering (AML) compliance and require managers and employees to adhere to these standards to prevent abuse of our Services for money laundering and terrorist financing purposes.

7.2. In pursuing its commitment to assist in the detection, prevention, and reporting of money laundering activities, Company shall:

- implement a risk based approach to assessing and implementing AML and KYC procedures;
- know its customers by obtaining satisfactory evidence of their identity and having effective procedures to verify the authenticity of the information furnished by new customers;
- ensure that its business is conducted in conformity with high ethical standards, that laws and regulations are adhered to, and that service is not provided where there is good reason to believe that transactions are associated with money laundering activities;
- cooperate fully with law enforcement agencies by, among others, taking appropriate measures allowed by law if there are reasonable grounds for suspecting money laundering;
- adopt policies consistent with the principles set out in this policy, and ensure that its staff, wherever located, are informed of these policies and adequately trained in matters covered herein;
- implement specific procedures for customer identification, record keeping and retention of transaction documents and reporting of covered and suspicious transactions.

7.3. To prevent abuse of our Services for money laundering and terrorist financing purposes We may collect including but not limiting the following information: photo of Your Passport or other identity card to show Proof of Identity; documentation that evidences your Proof of Address; name; telephone number; e-mail address.

## **8. RETAIN INFORMATION**

8.1. 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.

## **9. SECURITY**

- 9.1. We use relevant electronic and procedural safeguards to protect the privacy of the information You provide to the Platform 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 we are not liable for the security of any data You are transmitting over the internet, or third party content.**

## **10. CORRECT/UPDATE/DELETE PERSONAL DATA**

- 10.1. You have a right to access to your Personal Data and to require the correction, updating or deletion of incorrect or/and inaccurate data by writing us an email to [info@trueplay.io](mailto:info@trueplay.io). Nevertheless, this request must comply with Early-Sale and Token Sale purposes and our legal obligations.

## **11. AMENDMENTS**

- 11.1. The Company reserves the right to modify or amend this Policy at its own discretion. The changes can be viewed in the “Last Updated” field above. Your continued usage of the Website and/or services shall mean your acceptance of those amendments.

## **12. CONTACT**

- 12.1. If You have questions concerning this Policy, please feel free to send us an email [info@trueplay.io](mailto:info@trueplay.io).