



ETERNAL TRUSTS PRIVACY POLICY

Last updated: 21.03.2018

STATUS AND ACCEPTANCE OF PRIVACY POLICY

1. This Privacy Policy (hereinafter referred to as the “Policy”) sets forth the general rules of 'Personally Identifiable Information' ((hereinafter the “PII”) is being used online including its processing, distribution, use and keeping by the Eternal Trusts Distribution, a company incorporated in Singapore (hereinafter the “Eternal Trusts”, “Company”, “Us”, “We”).
2. Throughout this Policy, Eternal Trusts use the term “Personal Data” to describe PII information that can be associated with a specific person (hereinafter the User) and can be used to identify that person (including the information about the User’s activities, such as information about Your use of the Website, when directly linked to personally identifiable information, including automatically collected). Eternal Trusts does not consider Personal Data to include information that has been anonymized so that it does not identify a specific User.
3. It is understood and presumed that by the fact of the Website use and purchase of ETT Tokens or by providing Eternal Trusts the Personal Data directly on its request, the User has fully read, understood and 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 ETT Tokens.

COLLECTION, PROCESSING AND USE OF PERSONAL DATA

4. The main purpose of Personal Data collection, storage and processing of Personal Data within the Eternal Trusts project shall be the identification of the Eternal Trusts Token Purchaser during the ETT Tokens Sale event. We may also use the information

we collect from you when you register, make a purchase on the Website, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- (1) To improve our website in order to better serve You;
 - (2) To allow us to better service you in responding to customer service;
 - (3) To administer a contest, promotion, survey or other site feature;
 - (4) To quickly process your transactions;
 - (5) To send periodic emails regarding the Website and to follow up with them after correspondence (live chat, email or phone).
5. Eternal Trusts also use cookies to collect Personal Data from running the Website and use of Personal Data, provided to Eternal Trusts by You.

(1) What are Cookies?

A "cookie" is a piece of data that a web server creates when you visit a web site. This data is information about how and when you use a site. It is placed on your computer, smartphone, smart TV or tablet ("online device") in the form of a small textfile. The information cannot be used to identify you personally. Cookies do not collect personal information such as your name, address, telephone number, or email address.

There are two main types of cookies:

Session cookies: these are temporary cookies that expire when you leave the site. Session cookies allow the website to recognize you as you navigate between pages during a single browser session and allow you to use the website most efficiently. For example, session cookies enable a website to remember that a user has placed items in an online basket.

Persistent cookies: in contrast to session cookies, persistent cookies are stored on your

online device between browsing sessions until expiry or deletion. They therefore enable the website to "recognize" you on your return, remember your preferences, and tailor services to you.

We use both session cookies and persistent cookies on our website. The benefit of enabling cookies is that it will allow your use of Eternal Trusts's website(s) to be faster, easier and tailored to your interests.

(2) Why we use Cookies

Many cookies are designed to give you optimal usage of the web. For example, we use cookies to collect information about your activity on our websites to enable us to improve your user experience when using our websites, e.g. a cookie which recognizes if your browser supports specific technology features. This helps, for example, in enabling web pages to be loaded more quickly when you request the download of a large file. The information that we collect and share is not personally identifiable. It does not include your name, address, telephone number or email address.

We use cookies on this website for the following purposes:

To collect statistical information: We use cookies to collect statistical information on how you use our websites for statistical and evaluation purposes to help us understand how users use the website and help us improve the structure of our website.

Engagement: We use cookies to collect non-identifiable information to gain a better understanding of customer behaviours on our website(s) to develop engagement strategies to better serve you. This data may be matched with internal customer information to provide you with services that better reflect your needs.

Authenticating your computer: We use cookies to gather information such as IP Address and Browser type to authenticate you and your computer.

Security and verification: To help us maintain security and verify your details whilst you

use the website as you navigate from page to page, which enables you to avoid having to re-enter your details each time you enter a new page.

Personalized Content: To remember how you have customized your use of this site, such as your preferred currency and time zone.

(3) Use of Third Parties

We may use third party providers, such as Google Analytics, to help collect and compile information like the number of visitors to our site, where visitors have come to the site from and the pages they visit. Our third party providers may also use cookies to deliver advertisements that are more relevant to you and your interests and to help measure the effectiveness of an advertising campaign.

These third parties may collect your IP address or device identifier on the date you visit a site, but not your name or other identifying information. We do not combine information collected through the use of these third party providers with other personal information we may have about you.

Third party providers have their own cookie and privacy policies. Google's ability to use and share information collected by Google Analytics is restricted by the Google Analytics Terms of Service and the Google Privacy Policy.

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. <https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We use Google AdSense Advertising on our website.

Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of the use of the cookie by visiting the Google Ad and Content Network privacy policy.

We have implemented the following:

- a) Remarketing with GoogleAdSense
- b) Demographics and Interests Reporting

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

(4) Opting-Out

As part of our commitment to fair information practices, Eternal Trusts allow you to opt out of the use of information about your activities on other websites to provide you with Interest-based advertising.

You can opt out of Google Analytics by installing Google's opt-out browser add-on, and out of interest-based Google ads using Google's Ads Settings.

Even if you opt out, you may still receive Eternal Trusts advertising. It just means that the advertising you see will not be customised for you.

(5) Refusing Cookies

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place. You can limit the collection of your information by disabling cookies on your browser. You may also be able to modify your browser settings to require your permission each time a site attempts to set a cookie. However, our website(s) (and many other websites) rely on cookies to enable certain functionality. If you choose to disable cookies, some of the services available on our website may not work properly.

(6) External Websites and Links

Our websites may contain links to external websites. We are not responsible for the practices of those third party websites. Where you access other websites from our sites using the links provided, the operators of these websites may use cookies in accordance with their own cookies policy, which may differ from ours. You should read their privacy and cookie policies carefully before you provide any personal information to them.

(7) Caution regarding automatic Cookie Functionality

Browsers such as Microsoft Internet Explorer allow you to store passwords and logon IDs so you do not need to re-enter this information each time you access a web site. Eternal Trusts strongly urges you NOT to use this functionality to prevent unauthorized use of your online banking access code(s). This Personal Data includes:

- (1) Your IP address;
- (2) Device information including, but not limited to, identifier, name, and type, operating system;
- (3) Mobile network information;
- (4) Standard web log information, such as Your browser type, and the pages You accessed on Eternal Trusts Website.

When the User use a location-enabled device with Eternal Trusts Website and products, Eternal Trusts may collect geographical location data or use various means to determine the location, such as sensor data from the User's device that may, for instance, provide data on nearby cell towers and Wi-Fi access spots. However, Eternal Trusts will not release Your personal identifying information of such kind to any third party without Your consent, except as set forth herein.

6. If the User want to purchase ETT Tokens, Eternal Trusts collect and store the following types of Personal Data about You / Company yo represent:

- (1) Your full name / Full company name, the names of the director, members of the

management board or other body replacing the management board, and their authorization in representing the legal person;

(2) Date of birth / Registration number and date;;

(3) Your address, place of residence; / Registered address;

(4) Your email and contact phone number / Mobile telephone number and e-mail of the company.

7. Eternal Trusts may require You to provide additional information under KYC Procedure including:

(1) Passport or driver license details;

(2) Numbers that You may use or have registered with Your local tax authority;

(3) Utility bills;

(4) Your photo;

(5) Confirmation of proceeds sources;

(6) Sworn statements.

8. Eternal Trusts also reserve the right to request the User for remote identification procedure and to use third party services for such identification.

9. Eternal Trusts reserve Eternal Trusts right to request basic Personal Data, described in clause 9, prior to purchase of ETT Tokens and/or use of any services, available through the Website. Eternal Trusts may refuse the User access to the Website in case if Eternal Trusts have grounded doubts as to validity, authenticity and genuineness of the Personal Data, provided by the User.

10. If the User does not provide Eternal Trusts with the Personal Data as specified in

clauses 8, 9 hereof, the User shall not be able to use the full functionality of the Website and purchase ETT Tokens and/or use the Eternal Trusts platform. At that, Eternal Trusts shall not bear any liability for such possible incomplete use.

11. When the User access the Website or use Eternal Trusts products or services Eternal Trusts (or Google Analytics or similar service provider on our behalf) may place small data files called cookies on the User's computer or other device. Eternal Trusts use these technologies to recognize You as our Token Sale User, customize Eternal Trusts Website and advertising, measure promotional effectiveness and collect information about Your computer (as described in clause 7. hereof) 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 Website and services may be impaired.
12. Eternal Trusts is the only data controller and processor, except for the cases when there is an objective Eternal Trusts need to control/process or store Personal Data at Eternal Trusts's counterparties or agents. Should such counterparty or agent be engaged by the Eternal Trusts, Eternal Trusts shall notify You in advance.
13. You may access, review and edit Your Personal Data at any time by communicating Eternal Trusts in writing.
14. The User has the right to require Eternal Trusts to delete User's Personal Data provided by the User to Eternal Trusts or revoke his (or her) consent for collection, processing and storage of his (or her) personal data by Eternal Trusts at any time. If You decide to do this, You should send the respective notification to the Eternal Trusts. Eternal Trusts shall delete Your respective Personal Data from any sources within 24 hours from the moment Eternal Trusts receive such request from You. At that, the



Eternal Trusts reserves its right to suspend provision of any services to You referring to Eternal Trusts project and/or delete Your Account on the Website without prior notice, not providing any compensations to You.

15. Eternal Trusts will not publish any Personal Data related to Your purchase of ETT Tokens without Your prior written consent.

PERSONAL DATA PROTECTION AND SHARING

16. Eternal Trusts will do any and all efforts and actions prescribed by Applicable Law to store any of Your personal data in secrecy.
17. Eternal Trusts store and process Your Personal Data on Eternal Trusts servers in various jurisdictions, where our facilities and/or Eternal Trusts service providers are located. By submitting Your Personal Data, You agree to this transfer, storing, or processing. Eternal Trusts will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Policy. Eternal Trusts protect Your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards Eternal Trusts use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. Eternal Trusts also authorize access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. 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, Eternal Trusts will ensure that the Personal Data will be stored and processed with the

reasonable level of care and security.

18. Eternal Trusts is sometimes required to compare the Personal Data You provide to third party databases in order to verify its accuracy and confirm Your identity. This allows Eternal Trusts to comply with relevant anti-money laundering (AML) regulations and “know your customer” (KYC) regulations.
19. Eternal Trusts will not share Your Personal Data with any third parties other than Eternal Trusts respective identity verification partners. Eternal Trusts reserve our right to share Your Personal Data with:
 - (1) Eternal Trusts banking and brokerage partners;
 - (2) Companies that Eternal Trusts plan to merge with or be acquired by (should such a combination occur, Eternal Trusts will notify You and will require that the newly combined entity follow these terms with respect to Your Personal Data);
 - (3) Third party identification service providers for fraud prevention purposes;
 - (4) Law enforcement, government officials, or other third parties when Eternal Trusts are compelled to do so by a subpoena, court order, or similar legal procedure; or Eternal Trusts 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 Eternal Trusts policies;
 - (5) Eternal Trusts Personal Data processing counterparties or agents, hired by or cooperating with us, who’s services are required by us from the practical point of view;
 - (6) Other third parties only with Your prior consent or direction to do so.
20. Eternal Trusts will not provide Your Personal Data to any other Website users or third parties other than described in clause 21 herein without Your consent or direction.
21. Eternal Trusts will not sell or rent Your Personal Data to third parties.

22. Eternal Trusts may combine Your Personal Data with information Eternal Trusts collect from other companies and use it to improve and personalize the Website and our products, as well as our content and advertising.
23. Eternal Trusts may use Your name and email address to provide You with information about products or services that may be of interest to You, but Eternal Trusts will not use Your Personal Data without complying with applicable laws and, where appropriate, obtaining your consent.
24. Eternal Trusts 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 Eternal Trusts 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.

RETAIN INFORMATION

25. In accordance with Applicable Law and as needed to provide services to Eternal Trusts Users, Eternal Trusts may hold Your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. Eternal Trusts may retain Your Personal Data for as long as You possess ETT Tokens and/or use the Website. Moreover, Your Personal Data may be hold beyond the abovementioned period till it is indispensable for Eternal Trusts to have relevant information to respond to any issues that may arise later.



SECURITY

26. Eternal Trusts use relevant electronic and procedural safeguards to protect the privacy of the information the User provide to Eternal Trusts 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 Eternal Trusts are not liable for the security of any data Users are transmitting over the Internet, or third party content.

CHANGE/UPDATE/DELETE PERSONAL DATA

27. You have a right to demand Eternal Trusts to provide You access to Your Personal Data and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting Eternal Trusts. Nevertheless, this request must comply with Eternal Trusts ETT Tokens Sale Agreement and Eternal Trusts legal obligations.

AMENDMENTS

28. Eternal Trusts 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 shall mean Your acceptance of those amendments.