



**TontineTrust**  
Live Long & Prosper

# TontineTrust Privacy Policy

## Introduction

We are **Tontine Trustless Solutions Limited** ("**TontineTrust**", "the Company", "we" or "us"). Your privacy is important to us. We are committed to protecting the privacy, confidentiality and security of the personal data we hold by complying with the requirements under applicable laws and regulations including the laws and regulations of the BVI & European Economic Area (EEA). We are equally committed to ensuring that all our employees, service providers and agents uphold these obligations. This policy explains how we manage personal data within our organisation. Please view, read and save a copy of this Privacy Policy.

This Privacy Policy governs your use of products, services, content, features, technologies or functions offered by **TontineTrust** (including data you provide to **TontineTrust** in relation to the same) and all related sites, applications, and services (collectively "**TontineTrust Services**"). You accept and consent to this Privacy Policy when you sign up for, access, or use the **TontineTrust Services**. By accepting and consenting to this Privacy Policy, you expressly consent to our use and disclosure of your personal information in the manner described in this Privacy Policy.

## Personal Data

We collect personal data about you in a number of ways including:

- where you register for an account or to receive emails from us
- when you order products or services from us
- when you submit a query or request to us
- when you respond to a survey that we run or fill in forms on one of our websites
- by tracking your use of our websites and mobile applications
- from public sources
- from examination of public and private blockchains
- from third parties who are entitled to disclose that information to us

In some cases, we may also be required by law to collect certain types of personal data about you. Where we collect personal data from you, we will generally do so ourselves. However, in some cases we may collect personal data from a third party, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

The kinds of personal data that we collect and hold about you may include:

- identifying information, such as your name and date of birth
- contact information, such as your postal address, email address and telephone numbers
- social media handles and other social media profile information that you make available to us or to the public
- financial information, such as credit or debit card, bank account or other payment details
- online identifiers that may also constitute personal data, such as your MAC address, computer and mobile device unique device ID and IP information based on your internet connection settings ;
- blockchain identifiers, such as blockchain addresses and public keys

- usernames and passwords that you create when registering for an account with us
- details of any products or services that we provide to you
- information about how you use the products and services we provide
- records of our communications with you, including any messages you send us
- identity verification information, such as images of your government issued ID, passport, national ID card, utility bill or driving license.

Without this information, we may not be able to provide you with our products or services (or with all of the features and functionality offered by our products or services), to respond to queries or requests that you submit to us and to protect against the risks of cybercrime, fraud and money laundering & terrorist financing.

We use personal data that we collect about you for the following purposes:

- to verify your identity (including age) when you are dealing with us
- to determine your eligibility for any of our products or services
- to determine your compliance with the terms and conditions that apply to any of our products or services and applicable law
- to enable us to offer our products and services
- to provide you with the services, products and information you have requested
- to improve our website based on your information and feedback
- to answer your queries and requests
- to comply with our legal and regulatory obligations
- to carry out market analysis and research
- to monitor use of our products and services
- to assess, maintain, upgrade and improve our products and services
- to carry out education and training programs for our staff
- to manage and resolve any legal or commercial complaints or issues

- to carry out planning and forecasting activities and other internal business processes
- to keep you informed about our activities, including by sending out newsletters

We may from time to time use your personal data in order to send you marketing materials about products or services provided by **Tontine**Trust that we think you may be interested in but we shall always give you the opportunity to easily opt-out of any such communications.

You can opt-out of receiving marketing communications from us by contacting us at [prosper@tontinetrust.com](mailto:prosper@tontinetrust.com) or, in respect of emails, by clicking unsubscribe on the relevant email. We shall not use your personal data for marketing third party products and services unless we have received your consent.

We may share personal data about you with:

- your representatives, advisers and others you have authorised to interact with us on your behalf
- our staff who need the information to discharge their duties
- related entities within our corporate group
- our business partners, agents and service providers
- payment system operators and financial institutions
- identity verification agents
- fraud and crime prevention agencies and organisations
- prospective purchasers of all or part of our business or a related entity
- professional advisers who we engage to provide advice on our business
- government authorities and bodies, supra-national authorities and bodies, crime investigation agencies, courts and others who ask us to disclose that information as required by law

## Transfer of your personal data

**Tontine**Trust is a global firm, with offices, clients and suppliers located throughout the world. As a result, your personal information may be transferred to other **Tontine**Trust offices, data centers and servers in Europe, Asia, or the United States for the purposes identified above. Any such transfer shall take place only in accordance with and as permitted by the law of your jurisdiction, but please be aware that the laws and practices relating to the protection of personal information are likely to be different and in some cases may be weaker than those within your home jurisdiction. Regardless, in all events, we shall apply the provisions of this Policy to your personal information wherever it is located.

## Cookies

We use cookies and pixel tags to monitor and observe your use of our websites, compile aggregate data about that use, and provide you with a more effective service (which may include customising parts of our websites based on your preferences and past activities on those websites). "Cookies" are small text files created and stored on your hard drive by your internet browser software, in order to hold relevant information about the web page you are currently viewing. Most internet browsers have a facility that will allow you to disable cookies altogether – please refer to your browser's help menu to find out how to do this.

While you will still be able to browse our websites with cookies disabled on your internet browser, some website functionality may not be available or may not function correctly. "Pixel tags" (also called clear GIFs, web beacons, or pixels) are small blocks of code on a webpage that allow websites to do things like read and place cookies. The resulting connection can include information such as the person's IP address, the time

the person viewed the pixel and the type of browser being used. Please refer to our Cookie Policy for more information.

### **Storage and security of personal data**

We generally store the personal data that we collect in electronic databases, some of which may be held on our behalf by third party data storage providers. Sometimes we also keep hard copy records of this personal data in physical storage facilities. We use a range of physical and technical security processes and procedures to protect the confidentiality and security of the information that we hold, and we update these from time to time to address new and emerging security threats that you become aware of.

We also take steps to monitor access to and modification of your information by our staff, and ensure that our staff are aware of and properly trained in their obligations for managing your privacy. If you are a registered user of our services the security of your personal data also relies on your protection of your personal data and particularly any identity information and your secure access credentials (e.g. password and mobile authentication device or service) used to access **Tontine** Trust Services. You must not share your secure access credentials with anyone. If you lose your secure access credentials or share them with a third party for any reason, the third party may have access to your account and your personal information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your secure access credentials, please change them immediately and also contact us at [prosper@tontinetrust.com](mailto:prosper@tontinetrust.com) immediately.

### **Retention of personal data**

Your personal data will only be kept as long as required to meet our legal obligations and no longer than is necessary. In most cases we will retain your personal data for a period of between 1-6 years. In some cases we may be obliged to retain some of your

personal data for longer periods as are required by law. At our discretion, we shall retain personal data for any period we consider is reasonably necessary to meet our legal or regulatory obligations.

### **Access and correction**

If you want to access any of the personal data that we hold about you or to correct some aspect of it (for example, because you think it is incomplete or incorrect), please contact us at [prosper@tontinetrust.com](mailto:prosper@tontinetrust.com). To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases we will let you know why we cannot comply with your request. Even if you do not request access to and/or correct your personal data held by us, if we are satisfied that, having regard to the reasons for which we hold your personal data, that personal data is inaccurate, incomplete, out-of-date, irrelevant or misleading, we may take reasonable steps to correct that information.

### **Your consent**

By using **Tontine** Trust Services, you agree that:

- you consent to this privacy policy, as updated from time to time; and
- if you have provided personal data to us relating to any other person, you:
  - have a right to provide that information;
  - have provided a copy of this privacy policy, as updated from time to time, to that person; and
  - each such person has agreed to those terms.

### **Complaints**

We try to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your personal data and think we may have breached any applicable privacy laws, or any other relevant obligation, please contact us using the contact details set out below. We will make a record of your complaint and refer it to our internal complaint resolution department for further investigation. We will deal with the matter as soon as we can, and keep you informed of the progress of our investigation.

### **Changes to this policy**

We may make changes to this policy from time to time, to take into account changes to our standard practices and procedures or where necessary to comply with new laws and regulations. The latest version of this policy will always be available on our website and may also be notified to customers by other means (such as email). Unless we have grounds to do otherwise, we aim to provide you with at least 30 days' prior notice of the effective date of the revised privacy policy. As of the effective date of the revised privacy policy, you will be considered as having consented to all changes to the Privacy Policy. If you disagree with the terms of this Privacy Policy, you may close your account and/or stop using **Tontine**Trust services at any time.

### **Third Party Sites**

Some pages made available through **Tontine**Trust Services include links to third-party websites. These sites are governed by their own privacy requirements and policies, and **Tontine**Trust is not responsible for their operations, including but not limited to their data protection practices. Users submitting information to or through these third-party websites should review the privacy statements of these sites before providing them with personally identifiable information.

## Warranty

**Tontine**Trust provides the **Tontine**Trust Services to you as is. You use them at your own risk and discretion. That means they don't come with any warranty. None express, none implied. No implied warranty of merchantability, fitness for a particular purpose, availability, security, title or non-infringement.

## Limitation of Liability

**Tontine**Trust won't be liable to you for any damages that arise from your using **Tontine**Trust Services. This includes if **Tontine**Trust Services are hacked or unavailable as well as all types of damages (indirect, incidental, consequential, special or exemplary). And it includes all kinds of legal claims, such as breach of contract, breach of warranty, tort, or any other loss.

## No waiver

If **Tontine**Trust doesn't exercise a particular right under these Privacy Policy, that doesn't waive it.

## Severability

If any provision of these Privacy Policy is found invalid by a court of competent jurisdiction, you agree that the court should try to give effect to the parties' intentions as reflected in the provision and that other provisions of the Privacy Policy will remain in full effect.

## Entire agreement

This Privacy Policy is the whole agreement between **Tontine**Trust and you concerning the **Tontine**Trust Services as outlined herein.

### **Choice of law and jurisdiction**

This Privacy Policy is governed by the laws and regulations in the British Virgin Islands, without reference to its conflict of law provisions. You agree that any suit arising from the **Tontine** Trust Services must take place in a court located in the British Virgin Islands.

### **Contact details**

If you want any further information about our privacy and data protection policies or in respect of our management of your personal data, please contact our privacy compliance team at [prosper@tontinetrust.com](mailto:prosper@tontinetrust.com)