

# Privacy Policy for Selling BRICKs Tokens

Confidentiality of your personal data and protecting it while processing is Brixby's priority. Personal Data provided by you will be handled only according to the relevant legislation according to this Privacy Policy while selling BRICKs tokens (hereinafter "Policy").

Interacting with Brixby you freely and at your own discretion confirm your Consent to Brixby processing your personal data (hereinafter also "Consent") according to this Policy.

Your Consent is perpetual. You may withdraw your Consent by filling up a form "Send a note to Brixby" on [www.brixby.io](http://www.brixby.io). If You revoke Your Consent, BRIBY has the right to continue processing your personal data without Your Consent as based on this Policy.

Terms and definitions used in this Policy are consistent with terms and definitions used in general Terms and Condition, which can be found at [www.brixby.io](http://www.brixby.io). If any new terms and definitions are used, there meaning is based on the context.

## 1. STATUS AND ACCEPTANCE OF PRIVACY POLICY

- 1.1. This Policy establishes general rules for the collection, processing, distribution, use and storage of the Personal Data of [www.brixby.io](http://www.brixby.io) users.
- 1.2. Within the framework of this Policy, BRIXBY uses the term "Personal Data" to describe information that may be associated with a particular person (Participant) and can be used to identify that person (including information about the Participant's activities, such as information about Participant's use of the Website, directly related to the information that allows identifying the person, including information obtained automatically).
- 1.3. This Policy is an integral part of the Terms and Conditions, available on the [www.brixby.io](http://www.brixby.io). The Terms and Conditions available at [www.brixby.io](http://www.brixby.io) apply to any conditions that are not regulated by this Policy.
- 1.4. It is established and assumed that upon the use of the Website and the acquisition of BRICKs tokens or by providing BRIXBY Personal Data directly based on Brixby's request, the Participant has fully read, understood and accepted this Policy. If any of the Participants disagrees with this Policy as a whole or any of its parts, this Participant shall discontinue using the Website and/ or withhold from purchasing BRICKs tokens.

## 2. COLLECTING, PROCESSING AND USING PERSONAL DATA

- 2.1. The purpose of collecting, storing and processing of Personal Data within the BRIXBY project should only be the identification of the buyer of the BRICKs token.
- 2.2. BRIXBY collects Personal Data using the Website and uses the Personal Data provided by You to BRIXBY. When a Participant visits the Website or uses the Services, BRIXBY collects Personal Data sent to BRIXBY from your computer, mobile phone, or other device You use to access the Website. This Personal Data includes:
  - Your IP-address;
  - Device information, including but not limited to: the identifier, the name and the type of the operating system;
  - Mobile network information;
  - Standard information about from the weblog, such as the type of Your browser, and the pages you accessed on [www.brixby.io](http://www.brixby.io).
- 2.3. When a Participant uses a location-enabled device to log onto the Website and use BRIXBY products, BRIXBY can collect geolocation data or use various means for determining Your location, such as data from the Participant's device, which may, for example, provide information about nearby mobile towers and access points to Wi-Fi. Nevertheless, BRIXBY does not disclose

any information that may identify you to third parties without your Consent, except as provided in this document.

2.4. If the Participant wants to purchase BRICKs tokens, BRIXBY collects and stores the following Personal Data:

- Your name;
- Your email address and phone number.

2.5. In some cases (when additional verification is required by a bank or a compliance authority in accordance with such government requirements as "anti-money laundering" procedures (AML) or "Know Your Customer" (KYC) policy), BRIXBY may require You to provide some additional information, including:

- Your address;
- Date of birth;
- Passport, ID or driver's license;
- Your tax identification number or similar number which is registered in at your tax department;
- Utility bill;
- Your picture;
- Confirmation of source of income;
- Affidavit or notarised documents.

The above listed information and details are provided only upon a special personal request to the Participant and are indicated in the relevant e-mail.

2.6. BRIXBY reserves the right to request the basic Personal Data described in section 2.5, before purchasing the BRICKs tokens and / or using any services available through the Website. BRIXBY may deny the Participant access to the Website in case BRIXBY has reasonable doubts as to the validity, reliability and authenticity of the Personal Data provided by the Participant.

2.7. If the Participant does not provide BRIXBY with the Personal Data specified in sections 2.4 and 2.5 of this Policy, the Participant may be denied the use of all the functionality of the Website, the acquisition of BRICKs and / or the use of the BRIXBY Platform. Wherein, BRIXBY does not bear any responsibility for such possible partial use of Services.

2.8. When a Participant accesses the Website or uses BRIXBY products or services, BRIXBY may place small data files called cookies on the Participant's computer or other devices. BRIXBY uses these technologies to recognize You as a Participant, evaluates the efficiency of advertising and collects information about Your computer (as described in section 2.2 of this document) or other access device to reduce risk, prevent fraud, and build confidence and security. You may control the use of cookies in the settings of Your Internet browser. Please keep in mind that if You decline or delete certain cookies, the performance of the associated features and functions of our Website and services may be compromised.

2.9. BRIXBY only collects Personal Data required for the proper use of the Website or for purchasing of BRICKs tokens. In particular, BRIXBY uses the Participant's Personal Data for:

- Administration of the Website and providing the Services;
- Development of new products and services;
- Personalisation of the Website for you;
- Sending technical notifications and messages about support and administration;
- Communicating with You about products, services, promotions, events and other news and information that BRIXBY considers interesting for You;
- Monitoring and analysis of trends, use and activities related to the Website;
- Providing statistical information to third parties about Users of [www.brixby.io](http://www.brixby.io) (but these third parties will not be able to identify any individual Participant using this information);
- Detection, investigation and prevention of fraudulent transactions and other illegal activities and protection of rights and property of BRIXBY and others;
- Combining BRIXBY's Personal Data, provided by You or about You;
- Compliance checks with the Terms and Conditions governing the use of [www.brixby.io](http://www.brixby.io) (including monitoring personal messages sent through the personal message service of the Website).

2.10. BRIXBY is the only controlling person, as well as the person performing the data processing. However, in the event that there is an objective need for BRIXBY to manage / process or store Personal Data using counterparties or agents of BRIXBY, You agree that such counterparty or agent may be involved by BRIXBY for processing data without any additional or prior notice.

2.11. You can access, review and edit your Personal Data at any time by contacting BRIXBY in writing through the form on the Website.

2.12. The Participant may request BRIXBY to remove his/ hers Personal Data provided to BRIXBY anytime or to cancel his/her Consent for collecting, processing and storing of his (or her) Personal Data by BRIXBY. If you decided to do this, you must send a relevant notice to BRIXBY in writing. BRIXBY is required to remove Your Personal Data from any resources within 24 hours of receipt of such request from You, unless the applicable law requires Brixby continue storing or processing such data. BRIXBY reserves the right to suspend the provision of any services to You in relation to BRIXBY project and / or to delete Your Personal Data without a prior notice, without any compensation to You.

2.13. BRIXBY will not publish any Personal Data related to the acquisition of BRICKs tokens without Your prior written Consent.

### **3. PROTECTION AND EXCHANGE OF PERSONAL DATA**

- 3.1. BRIXBY will use its best efforts and the measures provided by the applicable law to store any of your Personal Data in secret.
- 3.2. BRIXBY stores and processes your Personal Data on BRIXBY servers in different jurisdictions where our premises and / or BRIXBY service providers are located. By providing Your Personal Data, You agree to its transfer, storage or processing. BRIXBY will take all necessary measures to ensure the safe handling of your Personal Data in accordance with this Policy. BRIXBY protects your Personal Data in accordance with internationally recognized standards, using physical, technical and administrative security measures aimed at preventing and reducing the risks of loss, misuse, unauthorized access, disclosure and modification of data. Some of the protective measures BRIXBY uses are the systems of network protection and data encryption, the means of controlling physical access to our data centres and the means that control the authorization of access to information. BRIXBY also allows access to Personal Data only to those employees or contractors who are required to have this access to perform their job duties or maintenance. All of Our physical, electronic and procedural safeguards are designed in accordance with applicable laws and regulations. Third parties may be located in countries where Personal Data processing legislation may be less stringent than in Your country. From time to time Your Personal Data may also be stored elsewhere, in such cases BRIXBY will ensures that Personal Data is stored and processed with an appropriate level of care and security.
- 3.3. From time to time BRIXBY may need to compare the Personal Data You provided for third party databases in order to verify its accuracy and verify your identity. This allows BRIXBY comply with the relevant anti-money laundering (AML) rules and the Know Your Customer (KYC) procedures.
- 3.4. BRIXBY will not transfer Your Personal Data to third parties, other than the relevant partners of BRIXBY for identity verification. BRIXBY reserves the right to transfer Your Personal Data to:
  - Banking and brokerage partners of BRIXBY;
  - A company that plans to merge with or acquire BRIXBY (in case there is an event of merger or acquisition);
  - Third party identification service providers for the purposes of fraud prevention;
  - Law enforcement authorities, government officials or other third parties in case BRIXBY is required to do so under a court order, judgment or similar legal procedure; or BRIXBY considers in good faith that the disclosure of Personal Data is necessary to prevent physical harm or financial loss, to notify about suspected illegal activities or to investigate violations of any of BRIXBY's policies or regulations;
  - Employees or relevant counterparties or personal data processing agents of BRIXBY, whose services are required from a practical point of view;
  - Other third parties only with Your prior Consent or reference.
- 3.5. BRIXBY will not disclose Your Personal Data to other users or to third parties other than those described in section 3.3 of this Document, without Your Consent or appropriate indication.

- 3.6. BRIXBY may combine Your Personal Data with information that is provided by other companies and use it to improve and personalize the Website and our products, as well as our content and advertising.
- 3.7. BRIXBY may use Your name and e-mail address to provide You with information about products or services that may be of interest to You, but BRIXBY will not use Your Personal Data without complying with applicable laws and, if necessary, obtaining Your Consent.
- 3.8. BRIXBY Website may contain links to or from the partners' websites, advertisers and affiliates (including, but not limited to, websites where the Website is advertised). If you follow a link to any of these websites, please note that these websites and any services that can be accessed through these websites have their own privacy policies and that BRIXBY assumes no responsibility or liability for these policies or for any Personal Data that can be requested and provided using these websites or services, such as contact information and location data. Prior to submitting Your Personal Data to any of these websites or using any services, please make sure to review and agree to terms and the privacy policy of those websites.

#### **4. STORAGE OF DATA**

In accordance with applicable law and for the purpose of providing Services to BRIXBY Participants, BRIXBY may store Your Personal Data. This is required to comply with legal obligations and to resolve possible disputes. BRIXBY may store your Personal Data as long as You own BRICKs tokens and / or use the Website. In addition, Your Personal Data may be stored after the expiration of the period mentioned above until BRIXBY needs to have the appropriate information to handle and respond to any questions that may arise later.

#### **5. SECURITY**

BRIXBY uses appropriate electronic and procedural safeguards to protect the confidentiality of information granted by the Participant to BRIXBY from loss, misuse, disclosure, modification and destruction. Please note that the transfer of data or information (including e-mail messages) via the Internet or other public networks is not completely secure. Please note that BRIXBY shall not be responsible for the security of any data transmitted by Participants through the Internet or third-party content.

#### **6. MODIFYING/ UPDATING/ DELETING OF PERSONAL DATA**

You may request BRIXBY to grant You access to Your Personal Data and require correction, updating or removal of incorrect and / or inaccurate data by contacting BRIXBY. However, this request must comply with the Terms and Conditions and legal obligations of BRIXBY.

## **7. AMENDMENTS**

BRIXBY reserves the right to modify this Policy at its sole discretion indicating the date of the last modification. By continuing using the Website You agree with and accept any and all amendments.