

## PRIVACY POLICY

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*Last updated: June 2018*

Data Protection Declaration of Qravity QCO GmbH, Kärntner Ring 17/22, 1010 Vienna ("**Qravity**", "**we**"), concerning the website [www.qravity.com](http://www.qravity.com) ("**Website**").

Thank you for your interest in the services of Qravity. The protection of your privacy and thus the protection of your (personal) data is our highest priority. The following declaration is intended to provide you with comprehensive information on (i) what data we collect, (ii) how we deal with it, and (iii) what rights you have. At the same time, we therewith fulfil our duties imposed by the General Data Protection Regulation of the European Union ("**GDPR**"), enforceable from 25 May 2018.

Data protection laws are generally relevant in case any processing of personal data is concerned. The terms used within the scope of this data protection declaration are defined in and by the GDPR. As such, the wide definition of "processing" of personal data means any operation or set of operations performed on personal data, such as, but not limited to, recording, organization, storage, alteration, and transmission of personal data. Any information allowing us or third parties to potentially identify you in person can be considered personal data. This terminology may also apply to IP addresses as long as they allow e.g. Internet Service Providers such identification.

This Data Protection Declaration refers exclusively to the above-mentioned website. If you are forwarded to other websites via links on our Website, please inform yourself directly on the target page about the respective handling of your personal data. We cannot assume any responsibility or liability for the content of third party websites that are linked via our Website.

### **1. Processing of Data related to the use of the Website**

By accessing our Website, the external IP address of your computer as well as specific data regarding the access (surfing behavior, additional meta data such as date and time of retrieval, requesting browser,) will be stored and logged for statistical, verification and organizational purposes as well as for technical safety and to improve the quality of our offer (Art 6 para 1 lit f GDPR, legitimate interests of Qravity).

Our services offered via our Website are designed to be used without indication of any additional personal data by the visitor. IP addresses are stored for a period of 1 year, after which the data shall be deleted unless a longer time period is necessary for compliance with legal obligations.

### **2. Data Processing following the Participation in the Initial Token Offering**

If you decide to participate in Our Initial Token Offering ("**ITO**"), which will consist of a token pre-sales phase from 18 August 2018 and the ITO launching on 1 September, we will collect certain additional data (see below) in order to provide our services. For more detailed information on the ITO please review our Website, the White Paper as well as our specific Token Offer Document, available under [ADD URL], and the Token Purchase Agreement, available under [ADD URL].

To participate, you are required to indicate your email address as well as the address of your wallet, your date of birth, telephone number, nationality, full name and full address. Wallet addresses are not considered personal data. These data serve the purpose of processing and executing the Token

Purchase Agreement (Art 6 para 1 lit b GDPR, "*necessary for the performance of a contract*") and are further required by Qravity to fulfil all relevant legal requirements, in particular KYC measures (Art 6 para 1 lit c GDPR, "*necessary for compliance with legal obligations to which the controller is subject*").

Personal data will be kept for as long as we reasonably consider necessary for achieving the purpose of performing the ITO and is permissible under applicable law. We will, in any case, retain your personal data for as long as there are statutory retention obligations or potential legal claims are not yet time-barred.

### 3. Rights of the Data Subject

A central aspect of data protection regulations is the implementation of adequate opportunities to allow for the disposition of personal data, even after the processing of said personal data has occurred. For this purpose, a series of rights of the data subject are set in place. Qravity shall comply with your corresponding requests to exercise your rights without undue delay and in any event within one month of receipt of the request. Please address your request to the following address: [office@qravity.com](mailto:office@qravity.com).

Specifically, the following rights are entailed:

- a) **Right to information and access to personal data:** should you exercise your right to information, we shall provide you with all relevant information regarding the processing of your personal data by Qravity, permitted to the extent of the law. As we are processing very little personal data in order to provide our services, we may not be able to identify your person by any means. Thus, we may only be able to provide information by requesting additional data to verify your status. This may apply to the other rights of the data subject as well.
- b) **Right to rectification:** with this right you may request the rectification of inaccurate or incomplete personal data (e.g. email addresses).
- c) **Right to erasure:** We are obliged to delete personal data (name, email address) upon your request as you may withdraw your consent at any time.
- d) **Right to data portability:** you may request to receive the data in a structured, commonly used and machine-readable format and transmit those data to another controller.
- e) **Right to restriction of processing:** restriction may be requested (i) for a verification period if the accuracy of the data is contested, (ii) if the processing is unlawful.
- f) **Right to lodge a complaint** with a relevant national supervisory authority.

### 4. Data transmission

For the purposes explained in this Data Protection Declaration, we will transfer your (personal) data to recipients of the following categories:

Within our organisation, those departments or employees who need your data to fulfil their contractual or legal obligations and as a result of data processing based on our legitimate interests, will receive it.

Furthermore, **(external) contractors** commissioned by us receive your data if they require the data to provide their respective service (whereby access to personal data is sufficient). All contractors are contractually obliged to treat your data confidentiality and to process it only within the scope of the provision of services. This includes the following categories of recipients:

- IT Support
- Hosting Provider

If we use contract processors, they are bound to our data protection practice as previously mentioned and will treat your personal data strictly confidential. Under no circumstances will they transmit your data to third parties or use it for purposes other than those intended to fulfil their obligations towards Qravity or in accordance with our express instructions without our express consent.

## 5. Data Security

Qravity will protect processed data adequately against unauthorized access (of third parties) in accordance with the provisions of the legal framework of Austria as well as the European Union. We will only process data which are essential to provide our services. Measures are taken with regard to (i) the quantity of data collected, (ii) the extent of data processing, (iii) the storage time as well as (iv) the accessibility of data. Data will not be used or stored by other means than set out in this Data Protection Declaration and are made accessible only to a restricted and necessary number of persons, whereby any processing of personal data is strictly limited to the specified and legitimate purpose. All employees of Qravity have been informed about applicable data protection provisions as well as data security measures and are bound to our privacy practices. Our web presence and other systems are adequately protected by a variety of security mechanisms.

Qravity will not transfer any of your personal data to third parties without explicit prior consent. However, if processing of personal data in the future should be carried out on behalf of Qravity by a so-called processor (a third party), this processing will be governed by specific contracts obliging the processor to comply with our Data Protection Declaration, to effectively ensure the protection of your rights as described above. Social Media

## 6. Cookies

Our Website uses "cookies". Cookies are small text files, which are stored on your computer in order to enable certain functions and thus make the Website more userfriendly. Please note that certain cookies are set as soon as you visit the Website. Depending on your browser software, you may have the option to configure how cookies are to be treated (e.g. deletion of cookies upon closing the browser, forbidding third-party cookies or cookies in general). Please be advised that restricting cookies may limit the functionality of our Website.

To learn about your cookie management options with the most common browsers, please use the following links:

- a) Internet Explorer™: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- b) Edge™: <http://www.thewindowsclub.com/allow-or-block-cookies-in-microsoft-edge>
- c) Safari™: [https://support.apple.com/kb/PH21411?locale=de\\_DE&viewlocale=en\\_US](https://support.apple.com/kb/PH21411?locale=de_DE&viewlocale=en_US)
- d) Chrome™: <https://support.google.com/chrome/answer/95647?hl=en&hlrm=en>
- e) Firefox™: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- f) Opera™: <http://www.opera.com/help/tutorials/security/privacy/>

## 7. Google Analytics

Our website uses tools, in particular Google Analytics, of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("**Google**"), which enable us to analyse how you use this Website, web application and/or App. Since a login to our Website is not intended or possible, you will only be assigned a client ID, which will be regenerated for different devices. The tracking code analytics.js (Java Script) is used for tracking. In this context, we process your data on the basis of our legitimate interest

in producing easy-to-use website access statistics in a cost-efficient manner (Art 6 Paragraph 1 lit f GDPR).

By using the software, a cookie is set (for the client ID), which is stored on your computer. The information generated by the cookie about your use of this Website is usually transferred to a Google server in the USA and stored there. However, due to the activation of IP anonymization on this Website, your IP address will be reduced by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area prior to its transmission to a Google server in the USA. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. Google will use this information for the purpose of evaluating your use of the Website, compiling reports on Website activity and providing other services relating to Website and internet usage. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data. Google cannot find out who you are.

Google is a participant in the EU-US Privacy Shield, which obliges the company to comply with the agreement and to maintain a level of data protection in line with European data protection standards. The Privacy Shield certification can be viewed at <https://www.privacyshield.gov/list>

With the procedure described under point 9 you can prevent the storage of cookies by a corresponding setting of your browser software (possibly limited to third party cookies). You can also prevent Google from collecting data generated by cookies and relating to your use of the Website (including your IP address) and from processing this data by downloading and installing an appropriate browser plug-in (<http://tools.google.com/dlpage/gaoptout?hl=en>). However, we would like to point out that you may then not be able to use all functions of the website to their full extent.

Further information on data protection in connection with Google Analytics and your options in this regard can be found at <https://www.google.com/analytics/learn/privacy.html?hl=en-GB>.

## **8. Links to websites of third parties**

As far as the Website contains external links, we hereby indicate that these third-party websites are not subject to the influence and control of Qravity. We disclaim all liability for losses or obligations related to the use of these third-party websites. We are not responsible for the contents, availability, correctness, or accuracy of these websites, nor for their offerings, links, or advertisements.

## **9. Contact Details Regarding Data Protection Issues**

In case you have any questions concerning Qravity's Data Protection Declaration or if you would like to exercise your right of information, rectification or deletion, please send us a written request outlining your desire to:

Qravity QCO GmbH

Kärntner Ring 17/22

1010 Vienna

Austria

Phone: +43 1 512 20 53

E-Mail: [office@qravity.com](mailto:office@qravity.com)

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**STADLER VÖLKEL**  
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