

Svandis Privacy Policy

Updated on: 11.06.2018

1. Who We Are?

1.1. SVANDIS OÜ is a private limited company incorporated in Estonia with company ID "14496016" and having its registered office situated at Harju maakond, Tallinn, Kesklinna linnaosa, Ahtri tn 12, 10151 (hereinafter referred to as "Svandis", "we", "us" or "our" in this Privacy Policy).

2. Welcome to the Privacy and Cookie Policy ("Privacy Policy")

2.1. Svandis respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you how your personal data is being used when you visit our website (regardless of where you visit it from) and give information on your privacy rights and how the law protects you.

3. Purpose of this Privacy Policy

3.1. This Privacy Policy aims to give you information on how Svandis collects and processes your personal data through your use of our website, including any data you may provide through this website when you sign up to our newsletter or alerts, participate in our Token Generation Event or purchase any product or service that we offer through the website. All other terms not defined herein will have the meanings set forth in the Token Generation Event Terms and Conditions.

3.2. This website is not intended for children, and we do not knowingly collect data relating to children under the age of 13. If you learn that your child has provided us with personal data without your consent, you may contact us at dpo@svandis.io. If we learn that we have collected any personal data from children, we will promptly take steps to delete such data.

3.3. It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements any other notices and is not intended to override them.

4. Controller

4.1. Svandis is the controller and responsible for your personal data.

4.2. We have appointed a Data Privacy Officer who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the Data Privacy Officer using the details set out below.

4.3. Our contact details are:

Svandis OÜ

Data Privacy Officer

Email address: dpo@svandis.io

4.4. If you are dissatisfied, you have the right to lodge a complaint with the Data Protection Supervisor the supervisory authority for data protection issues. You can find out how to do this at the Estonian Data Protection Inspectorate (AKI) <http://www.aki.ee/en/inspectorate> or European Data Protection Supervisor <https://edps.europa.eu/>. We would, however, appreciate the chance to deal with your concerns before you approach the (AKI) so please contact us in the first instance.

5. What Personal Data Do We Collect, Why and When?

5.1. We collect personally identifiable data from you when you subscribe to our newsletter, register as a Client, respond to a survey or marketing communication, or fill out a form on our Website.

5.2. The data encompasses anything you fill on the forms on the Website (svandis.io) and consists of the following:

6. Purposes for Which We Will Use Your Personal Data

Purpose/Activity	Type of Data	Lawful Basis for Processing
a) Newsletter b) Marketing Communications c) Quality of Service	<ul style="list-style-type: none">NameEmail Address	Consent and/or performance of a contract with you
Early Contributor Agreement	<ul style="list-style-type: none">NameAddressDate of BirthEthereum Address	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Comply with a legal or regulatory obligation
Whitelist	<ul style="list-style-type: none">NameEmail addressEthereum addressCountry of CitizenshipCountry of ResidenceTelegram UsernameSocial Reputation (e.g., LinkedIn, Twitter)	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
("KYC") "Know your Customer" ("AML") "Anti-money laundering" checks	<ul style="list-style-type: none">Proof of Identity (passport or driver's license)Proof of Address (utility bill or copy of bank statement)	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Comply with a legal or regulatory obligation

6.2. Non-personally identifiable data might be collected when you visit our Website.

7. How Do We Use Your Data?

7.1. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation.

7.2. We may use the data we collect as described in the previous section in the following ways:

- To administer any program including but not limited to funding, contest, promotion, or survey;
- To enhance the security of our Website and related programs, and spot potential breaches;
- To quickly process your requests or transactions;
- To improve our Website in order to serve you better;
- To allow us to better service you in responding to your customer service requests;
- To send periodic emails regarding your order or other products and services;
- To follow up with them after correspondence (email, live chat, or phone inquiries);
- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.

8. Cookies and Analytics

8.1. The Website might use cookies and other behavior tracking technologies. They might be used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services and supply additional security measures. We compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

8.2. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information.

8.3. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since every browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookie settings.

8.4. We do not include or offer third-party products or services on our Website, other than listing systems compatible with the Company's products.

8.5. Our Website uses Google Analytics. 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 optimize website experience.

9. Opting Out

9.1. Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt-Out page or by using the Google Analytics Opt-Out Browser Add-on.

10. How Do We Protect Your Data?

10.1. Our Website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visits as safe as possible.

10.2. Your personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive data you supply is encrypted via Secure Socket Layer (SSL) technology.

11. Third Parties

11.1. We do not sell or trade or offer any of your personally identifiable data to any third parties. This does not include trusted third parties who assist us in operating our Website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your data when we believe release to be appropriate to comply with the law, enforce our site policies, protect our other rights, property, or safety, or to comply with KYC and AML requirements.

11.2. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

11.3. We do not include or offer third-party products or services on our Website, although there might be links to third-party websites on our Website. These third-party sites have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

12. Your Rights

12.1. Right of Access

12.1.1. The General Data Protection Regulation gives you the right to access information that we hold about you. If you want to access that information, please send us a request at dpo@svandis.io.

12.1.2. Any request for access of your information shall be a subject to providing the acceptable proof of identification. If all comply, you will be provided with the copy of your personal data. If a person's request for information or measures is clearly unjustified or excessive, a reasonable fee may be asked or the action taken may be refused.

12.2. Right of Rectification

12.2.1. You can have your personal data rectified at any time, in case it is inaccurate or incomplete. You should notify us to correct or update your personal data. You can notify us at any time at dpo@svandis.io.

12.3. Right of Erasure

12.3.1. Personal data processed by Svandis shall not be kept for longer than is necessary for the intended processing or legal purposes. You can request the deletion of your personal data at any time by contacting us at dpo@svandis.io. Once your request has been verified, and unless keeping your personal data is required to satisfy a legal obligation, Svandis shall delete your data within 30 days.

12.4. Right to Restrict Processing

12.4.1. In certain circumstances, you have a right to restrict or block us from processing your personal data.

12.5. Right to Withdraw your Consent

12.5.1. In certain circumstances, you have the right to withdraw your consent to the processing of your personal data at any time by contacting us at dpo@svandis.io.

12.6. Right to Data Portability

12.6.1. Starting May 25, 2018, you have a right to request the personal data from us and reuse this data for other services. If Svandis intends to process your personal data for purposes other than those for which they were originally collected, you will be informed in advance of the purpose of further processing the data in question.

12.7. Right to Object

12.7.1. At any given time, you have a right to object to the processing of your personal data.

12.8. Right Related to Automation

12.8.1. You are protected from automated decision-making processes.

13. Governing Law, Jurisdiction and Submitting Complaints

13.1. This Privacy Policy and obligations arising from or related to it are governed by the legislation of the Republic of Estonia.

13.2. Any and all disputes arising from or related to the personal data protection will be settled by the parties by way of negotiations. Failing agreement, you shall have the right to lodge a complaint with the supervisory authority Estonian Data Protection Inspectorate, Väike-Ameerika 19, 10129 Tallinn, Estonia, or a claim to court.

13.3. In case the dispute between the parties is to be resolved in judicial proceedings, the parties agree to refer the dispute to Harju County Court in accordance with the legislation in force in the Republic of Estonia.

13.4. The above mentioned does not exclude consumers from their rights regarding jurisdiction.

14. Updates to this Privacy Policy

14.1. We will post any adjustments to the Privacy Policy on our website, and update the date above. If you are concerned about how your personal data is used, you are encouraged to keep a copy of this Privacy Policy as it may change periodically. Your continued use of the Service after changes to the Privacy Policy constitutes your acceptance of the new terms of the Privacy Policy.

14.2. From time-to-time, we may opt to use personal data for uses not previously disclosed in our Privacy Policy. If our practices change regarding previously collected personal data in a way that would be materially less restrictive than stated in the version of this Privacy Policy in effect at the time we collected the personal data, then we will make reasonable efforts to provide notice and obtain consent to any such uses as may be required by law.