

Last updated: 8/10/2018

Privacy Policy

Helvetic Blockchain Management Sàrl ("us", "we", or "our") operates <http://www.truegold.org> (the "**Website**"). This Privacy Policy outlines practices with respect to the collection, use and disclosure of information we receive from users who access our Website, register or use our services (collectively the "**Users**", "you" or "your").

By using the Website, you agree to the collection and use of information in accordance with this policy. We encourage Users to carefully read the Privacy Policy and use it to make informed decisions.

What information we collect

While using our Website, we may collect two types of information from Users:

We may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to, the following information ("**Personal Information**"):

- Registration information: When you open an account in our Website, you will be asked to provide us with certain details such as your name and contact information.
- Purchase of our products and/ or services: When you buy our products and/ or services, we will ask you to provide us with detailed information on your identity, contact details and any other information which may be pertinent with the respect to the services and/or products we provide.
- Device Information: We may also collect Personal Information from your device, such as geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Website.

The second type of information consists of un-identified and non-identifiable information pertaining to Users, which may be made available or gathered whenever you visit the Website ("**Non-personal Information**" or "**Log Data**"). Non-personal Information may include technical information transmitted by your device (e.g. Computer's Internet Protocol address, browser type, browser version) and information on your activity on the Website (e.g. pages viewed, online browsing, clicks, actions and other statistics).

How the information is used

We may use the information for the following purposes:

- Setting up accounts/ providing services;
- Verifying your identity and determining your eligibility to purchase our products and/ or services;

- Support: communicating with you, sending you notices pursuant to our General Terms and Conditions, providing you with technical information and responding to any customer service issue you may have;
- Informing you of our latest updates;
- Advertising/ marketing and direct marketing;
- Conducting statistical and analytical purposes, intended to improve the Website.

Cookies

When you use our Website, we may store cookies on your device (as well as other tracking technologies like web beacons and pixels) in order to facilitate and customize your use of our Website. A cookie is a small data text file, which a website stores on your computer's hard drive (if your web browser permits) that can later be retrieved to identify you to us. Our cookies may store information regarding your Account information. You are always free to decline our cookies if your browser permits, but such disabling may cause some of the features of our Website not to operate properly and your online experience may be limited.

We also use a tool called "Google Analytics" to collect information about your use of the Website. Google Analytics collects information such as how often users access the Website, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Website and services. Google Analytics collects the IP address assigned to you on the date you visit websites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this

With whom we share the information

We may transfer or disclose Personal Information to our subsidiaries, affiliated companies and subcontractors.

We may also share Personal Information with our trusted third party providers, who may be located in different jurisdictions across the world, for any of the following purposes:

- KYC approvals;
- Data storage and process;
- Advertising;
- Direct marketing;
- Performing research, technical diagnostics or analytics;

We may also disclose information if we believe that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or

governmental request; (ii) enforce our policies (including our General Terms and Conditions), including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of our users, yourself, us or any third party; or (vi) for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights.

Third party collection of information

This Privacy Policy does not apply to the practices of companies that we do not own or control, or to individuals whom we do not employ or manage, including any of the third parties to which we may disclose information as set forth in this Privacy Policy.

User Rights

You may request to:

1. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information.
2. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
3. Request rectification of your personal information that is in our control.
4. Request erasure of your personal information.
5. Object to the processing of personal information by us.
6. Request to restrict processing of your personal information by us.
7. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements. If you wish to exercise any of the aforementioned rights, or receive more information, please contact us at contact@truegold.org.

Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Under applicable regulations, we will keep records containing client personal data, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

How we safeguard your information

We take great care in implementing and maintaining the security of the Website and your information. Although we take reasonable steps to safeguard information, no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security and cannot be responsible for the acts of those who gain unauthorized access or abuse our Website, and we make no warranty, express, implied or otherwise, that we will prevent such access.

Corporate transaction

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In this event, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

Minors

We forbid users under the age of 18 to register or purchase our services and/or products. In the event that we become aware that a user under the age of 18 has shared any information, we will discard such information. If you have any reason to believe that a user under 18 has shared any information with us, please contact us at contact@truegold.org.

Changes to this Privacy Policy

We reserve the right to periodically amend or revise the Privacy Policy; material changes will be effective immediately upon the display of the revised Privacy policy. The last revision will be reflected in the "Last updated" section. Your continued use of the Website, following the notification of such amendments on our Website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us with, or by placing a prominent notice on our website.

How to contact us

If you have any general questions about the Website or the information we collect about you and how we use it, you can contact us at contact@truegold.org.