

## PRIVACY RULES

"PRINCIPLE", "We", "Us" or "Our", "Ours" refers to the company Navipro d.o.o., with its business address at Dunajska cesta 21, Ljubljana, Slovenia.

The Privacy Policy is part of the General Terms of Use ("**General Terms**") governing the use of all products with brand "PRINCIPLE", including web sites and / or software applications ("**Services**") that may operate on all types of computer devices (including mobile devices) and applies to your use of the Services. The website is at the address <https://blockchainvalet2018.blockblock.co/>, which can be replaced or which can be added to the list of websites and contain a link to this privacy policy.

By agreeing to the General Terms and / or using the Services, you agree in particular with the collection, use and disclosure of your information (including personal data) in accordance with this Privacy Policy. We collect and / or request that you provide us with your information (including personal information) each time you contact us or use the Services. This Privacy and Privacy Policy applies to anyone who, in accordance with the General Terms and Conditions of the <https://www.principle.network/> and <https://blockchainvalet2018.blockblock.co/> site, is considered to be a user, and for the entire site, for all of its components and subpages.

This policy applies to the user when it first visits the site and at any subsequent visits. By using the site, the user acknowledges that he accepts and agrees with all the provisions of this policy. Privacy policy may be modified or updated at any time without notice or notice. By using the site after changing this policy, the user confirms that he agrees with the changes.

We take the privacy of our users and the security of data very seriously, and we believe in the right of our users to know what information is collected and for what purpose. We strive to ensure that our activities are transparent and allow our users to control collected data and remove them if they so desire. We will take all reasonable precautions to prevent unauthorized access to this information.

By using any of our Services, you also agree to collect, transfer, edit, save, disclose, and otherwise use your information as described in this Privacy Policy. Regardless of the country in which you are located, you authorize the Principle to use (transfer, store) your data stored by the Principle in Slovenia or in other countries where third party services operate on behalf of Principle. Privacy and data protection legislation in some of these countries may be different from the laws in your country.

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provisions of this policy. Privacy policy may be modified or updated at any time without notice or notice. By using the site after changing this policy, the user confirms that he agrees with the changes.

#### **1. Collected data and what they are used for**

We may collect some or all of the information you have provided us with information about your use of the Services, but we will primarily use the information collected to enable you to use the Services satisfactorily and to improve your user experience.

##### **1.1. Collection of device data and technical information**

We may collect information necessary for your use of our Services, and data that enable us to maintain and analyze the performance and customize the content of our Services. We automatically get certain information about your computer device, including the IP address; State code; Time zone; start / stop time; IDFA, IDFV, language; Network status (WiFi, etc.), Plug-in types and browser version; platform, SDK version, timestamp; Device technical data (e.g., Model and device name, operating system name and version, processor data, memory size, screen size, software, mobile operator, Internet service provider, application ID key identifier, international identity of mobile equipment (IMEI ) in Android, Android ID, serial number Android); Although some of this information (for example IDFA, IDFV, Android ID, IP address) can uniquely identify your device, this information does not personally identify you. Some legislation may deal with information that uniquely identifies your device as personal data. Unlike cookies, data that uniquely identifies your device can not be deleted, but you can set up advertising identifiers in the settings on your mobile devices. Advertisers also use device identifiers or advertising identifiers to track your use of the Services, track the number of ads displayed, measure ad performance, and show ads that are more relevant to you. Analytics companies use identifiers for tracking information about the use of the Services. IP address) can uniquely identify your device, this information does not personally identify you. Some legislation may deal with information that uniquely identifies your device as personal data. Unlike cookies, data that uniquely identifies your device can not be deleted, but you can set up advertising identifiers in the settings on your mobile devices. Advertisers also use device identifiers or advertising identifiers to track your use of the Services, track the number of ads displayed, measure ad performance, and show ads that are more relevant to you. Analytics companies use identifiers for tracking information about the use of the Services. IP address) can uniquely identify your device, this information does not personally identify you. Some legislation may deal with information that uniquely identifies your device as personal data. Unlike cookies, data that uniquely identifies your device can not be deleted, but

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- **Collection of personal data**

We collect your personal information such as e-mail address, telephone number, ethereum address and we can also collect personal information such as your name and surname, place of residence, any other information that the user himself voluntarily sends to the company.

Every user of <https://blockchainvalet2018.blockblock.co/> and <https://www.principle.network/>, who carries out the personal data entry on our website, also gives active personal consent to process personal data on the basis of a special

form, which he submits together with the sent request / order / registration to e-news / registration / use of the Services.

By submitting sensitive information, you consent to our collection, use and disclosure of sensitive information, as permitted by applicable law on the protection of personal data. We can collect your geolocation data with your consent. We can collect this information through a website, an application, or other Services. By using the Services, you allow us to collect, break down and store information related to the provision of the Services.

When you provide personal information through our Service, information can be transmitted to servers across countries around the world.

Customer or user of the site or by clicking the button "I agree to the general terms of use and privacy policy", the user of the website confirms that before the registration, he was duly informed in writing about the scope and purpose of processing personal data from the previous paragraph.

We will only use the contact information you provide to us (for example, your name and e-mail address and phone number) for the purpose that you have provided us. We will not provide this information to third parties.

To delete your contact information that we received from your special inquiry via email, please send an email to [contact@principle.network](mailto:contact@principle.network) or [blockchainvalet2018@blockblock.co](mailto:blockchainvalet2018@blockblock.co) and your e-mail address will be deleted from our database.

#### **1.2.1. Pixel marks**

We reserve the right to insert image beacons (web beacons) or clear GIF images) to web pages, ads and emails. These tiny, invisible graphics files are used to access cookies and monitor user's online activities (for example, the number of times a page is visible). We use pixel tags to measure the popularity of our features and services. Advertising companies also use pixel markers to measure the number of ads displayed and their performance.

#### **1.2.2. How to access data and correct them**

If you have a Principle user account, you have the option to view and update your personal information within the Services application by entering your user account. Under some of the applicable personal data protection laws, you may be granted the right of access and / or an application to correct an error or omission in your personal information that is in our possession or under our control. We will help you with the request for access.

We will reply to the requests within the time allowed by the applicable laws in the field of personal data protection and try to make the answer as accurate and complete as

possible. All personal data corrections will be sent to any organization that has been disclosed.

In some exceptional circumstances, we may not be able to provide access to certain personal information that we have. If access or corrections can not be provided, we will inform the individual in writing within 30 days of the reasons for the refusal.

### **1.2.3. The purpose of data processing**

The provider will use the collected user data exclusively for the following purposes:

- for the service provided in accordance with the General Terms and Conditions;
- Keeping records of users;
- informing about novelties or offers by Principle;
- occasional sending of e-mails (if an individual registers to receive our e-mails) with content related to the website and campaign offers, notices, articles, current events and benefits offered by Principle;
- to deliver the required ordered products / information;
- statistical, marketing and other analysis and research related to website users, in order to improve the offer and services of the provider;

### **1.3. Personal data**

We share your personal information with others only in the manner described in this Privacy Policy, or in the event that we inform you and give you the option of refusing to share your personal information. We can share personal information with:

- **Service providers** . Data, including personal and financial information, can be shared with third parties who perform certain services on our behalf. These services may include meeting orders, providing customer service and marketing assistance, conducting business and sales analysis, ad monitoring and analytics, reviewing members, supporting our service functionality, and supporting contests, prize-winning games, surveys and other features offered by our Service. These service providers may have access to the personal data necessary for the performance of their tasks but are not permitted to share or use such personal data for other purposes.
- **Other situations**. We may disclose your information, including personal information, in the following cases:
  - On the basis of a summons or similar investigation, court orders or requests for cooperation by a law enforcement agency or other government agency; for the purpose of establishing or enforcing our statutory rights; to defend against legal claims; or if the law requires otherwise. In such cases, we can request or waive any legal remedies available to us;

- When we consider that disclosure is appropriate in connection with the efforts to investigate, prevent or take other measures in relation to illegal activity, alleged fraud or other violations; to protect and defend the rights, property or safety of our company, our users, our employees or others; to comply with applicable law or law enforcement cooperation; or to enforce our General Terms or other agreements or policies;
- In connection with a larger corporate transaction, such as the sale of our company, the divestiture, merger, consolidation or sale of assets.

#### **1.4. Do not follow ("Do Not Track")**

Not followed ("DNT") is a privacy setting that users can set in their web browsers. DNT is a way by which users can notify websites and services that they do not want specific information about their visits to websites collected over time and through websites or online services. We are committed to providing you with meaningful decisions about the information we collect, and therefore we offer the above links for which a rejection is possible. However, we do not recognize any DNT signals and do not respond to it, as the internet industry works by precisely determining what DNT means, what it means to comply with DNT, and a common approach to responding to DNT.

#### **1.5. Our use of collected information**

The information we collect from you is used to provide and promote our Services, internal analysis and research to improve the Services. You agree to the collection, processing and storage of data as provided in this Privacy Policy. We use information we collect about you or your device to provide services and to operate our business. Such use by us and our partners can include:

- providing our services: developing, implementing and improving our products, services and content, adapting our products and services, providing software updates and user support, understanding and analyzing trends in the use of services and websites, managing services and websites, and communication with customers. For information that can be treated in some jurisdictions as personal data, only device identifiers are used;
- managing your user account and providing customer support;
- analysis and research: Understanding and analyzing trends related to the use of services and websites, audits, learning about user behavior within the Service (how often you use the Service / Website, events that occur within the Service, combined use, performance data etc.), collecting demographic information about our users, collecting information about where the service was transferred. For information that can be treated in some jurisdictions as personal data, only

device identifiers are used. The data we receive from social networks of third parties is used for internal analysis;

- communicate with you by e-mail, post, telephone and / or mobile devices about products or services that are of interest to you, either by us or by third parties;
- developing, displaying, and tracking content and advertising tailored to your interests in using our Services and other sites, including the provision of our ads when you visit other sites;
- enforcing or exercising any right in our General Terms and Conditions; and
- perform a function or service, as otherwise provided to you before collection.

For a detailed explanation of what information is being used for some purpose and with which partners see "Cookies", part of this privacy policy.

### **1.6. Push notifications**

We can use only push notifications to let you know about your activities within the Services. You will receive push notification only if you have subscribed to them, or if you have enabled them within the Services. You can unsubscribe from the receipt in accordance with the instructions for using the device. We collect the push notifier tokens to determine whether you are subscribed to push notifications. When you choose to unsubscribe from push notifications, such notification tokens will be deleted from our database.

### **1.7. Saving information**

We store the data for as long as it is necessary for legal business purposes, and as per the applicable legal requirements, we are allowed to use our Services.

The user is aware and agrees that the provider keeps the information that he has provided to him at the time of registration, at the time when the user has the status of a registered user in the provider's applications, or is an e-news subscriber, and another year after the termination of this status, cancellation of the application to e-news. Other information may be kept as long as this is strictly necessary to achieve the purpose for which the data were collected, and then permanently deleted or effectively anonymised, so that the specified data can no longer be associated with a particular user, except in the case of a user's request in accordance with point 1.14.

Personal data we collect on the basis of the explicit consent of an individual is processed for purposes defined by consent and kept until cancellation of consent.

If you close your account, we will retain some information for the analytical purposes and integrity of documents and for the prevention of fraud, the enforcement of our General Terms, for the use of measures we consider necessary to protect the integrity of our services or users, or for other measures allowed by law. In addition, if certain

information has already been transmitted to third parties, pursuant to this Privacy Policy, the rules for these third parties apply for the storage of this information.

In order to protect personal data, the user is also responsible for ensuring the security of his username and password and the appropriate software (antivirus) protection of his or her computer.

#### **1.7.1. For EU countries**

We store personal data as long as it is necessary to provide our Services, unless a longer period is required or allowed by law. Traffic information is deleted or becomes anonymous, if it is no longer necessary for the transfer, or in the case of paid services until the end of the period in which it is legally possible to challenge the bill or make a payment. Location data is stored in the extent and duration required to provide Value Added Services. Cookies, direct marketing and provision of information on value added services (including traffic data used for these purposes) shall be kept as long as necessary to ensure these activities or until such time as the user avoids such use in accordance with this Privacy Policy. Information is kept for as long as we believe, that this is necessary for the provision of our Services. The content of this paragraph shall not prevent the technical storage or access to information solely for the purpose of carrying out the transmission of a message or, if this is strictly necessary, so that we can provide the required service.

Storage may vary, depending on the area of data collection and applicable legislation, but we always strive to store data only as long as it takes for the provision, improvement, or customization of our services.

#### **1.8. Deleting information**

When data is no longer needed, they are deleted by using appropriate measures to protect information from unauthorized access or use.

#### **1.9. Protection of personal data**

We have included reasonable security measures to protect the confidentiality, security and integrity of the data collected, and to prevent unauthorized access and use of data that conflicts with this Privacy Policy. The protection of personal data is ensured in accordance with this policy and with the requirements for personal data protection provided by the legislation of the Republic of Slovenia (the current Personal Data Protection Act, Official Gazette of the Republic of Slovenia, No. 94/07 with amendments) and the General Regulation of the GDPR. While we strive to ensure that your data remains safe while we are in possession, be aware that no security measure is complete or safe against intrusions. So, although we endeavor to ensure the security

of your information, we do not promise and you should not expect your personal data, chats or other messages to remain safe anyway.

You agree that we can communicate with you electronically on security, private and administrative issues, such as security invasions. We can publish an invasion notice. We can also send you an email to the email address you sent to us. You may have a legal right to receive this notice in writing. If you would like to receive a free security notification in writing (or if you want to withdraw your consent from receiving an email), please contact us at [blockchainvalet2018@blockblock.co](mailto:blockchainvalet2018@blockblock.co) or [contact@principle.network](mailto:contact@principle.network).

#### **1.10. Integrity of personal data**

We strive to keep your information accurate, complete and up to date. You can access, verify, and ensure the integrity of your information as described in this privacy policy.

#### **1.11. Check out**

You can always opt out of the future collection of personal information by Principle in accordance with this Privacy Policy by deleting your account and terminating with the use of the Services.

#### **1.12. Cookies**

A cookie is part of the data stored on the user's computer and is associated with user information. Most browsers allow you to disable cookies or set the browser to alert you when they are sent to your computer. Keep in mind that the removal or blocking of cookies can affect the user experience and you may need to manually customize some settings each time you visit our site and some features may not work.

When you visit our website, you agree that you can place cookies on your computer that uniquely identifies your browser. We use cookies to improve the quality of our services by storing usernames and tracking usage data. We use cookies for very limited purposes.

##### **1.12.1. Google Analytics cookies**

As a large number of websites, we use Google Analytics to measure the use of our website. Google Analytics uses cookies for more effective tracking to individual users of the site.

Cookie name The duration of Google Analytics

\_\_utma 2 years Used to distinguish users; Google Inc.

\_\_utmb 30 min Used to determine the session; Google Inc.

\_\_utmc When the browser is closed It is used to determine the session; Google Inc.

\_\_utmz 6 months It is used to identify the source of Visitors; Google Inc.

\_mauid 10 years Used to differentiate users; Net-Results

\_\_atuvc 3 years Used to distinguish users; AddThis

We collect all collected information on the website in accordance with the Personal Data Protection Act and the Law on Electronic Communications (ZEKom-1), and we will not sell or lease your personal data to third parties.

#### **1.14. User / customer rights under the general GDPR regulation**

As a user of our website, you are informed that you can request at any time to:

- verify that the data is processed or not, and allow you to view your personal data contained in the personal data collection and copy or copy them;
- We provide access to the catalog of the personal data collection. a record of the processing of personal data;
- We provide the display of personal data contained in the collection of personal data relating to you;
- we provide a list of users to whom personal data have been transmitted, when, on what basis and for what purpose;
- provide information on the sources on which the records contained in your personal data collection and the processing method are based;
- provide information on the purpose of the processing and the type of personal data being processed, as well as any necessary explanations in this regard;
- explain technical or logical-technical decision-making procedures in the case of automated decision-making by processing personal data of an individual.

As a user of our website, you are aware of the fact that, in accordance with the applicable Personal Data Protection Act and the General Regulation GDPR, you have the following rights:

- that processing of your personal information is restricted when one of the following cases applies:
  - if you dispute the accuracy of the data (processing is limited for a period allowing us to verify the accuracy of personal data);
  - if the processing is illegal and you are opposed to the deletion of your personal information and, instead, request a restriction on their use;
  - We do not need more information as a data controller for the agreed processing purposes, but you need them to enforce, enforce or defend legal claims;
  - in the event of an objection concerning the processing, until it is verified that the legal reasons for the controller prevail over your reasons;
- (The Principle is obliged to correct your inaccurate personal information, and also (having regard to the purposes of the processing), the right to complete incomplete personal information, including the submission of a supplementary declaration;

- (and "Forget") - if you no longer want your personal data to be processed and provided that there are no legitimate reasons for their further storage, You may request that your information be erased without undue delay, when one of the following reasons (except for legal exceptions) applies:

- o Your personal information is no longer needed for the purposes for which it was collected or otherwise processed;
- o revoke the consent on the basis of which the processing takes place and when there is no other legal basis for processing;
- o You are objecting to the processing provided that there are no overriding legitimate reasons for processing; or (at any time) you object to processing where personal data is processed for the purposes of direct marketing;
- o Your personal information has been processed unlawfully;
- o Your personal information needs to be deleted in order to fulfill a legal obligation in accordance with the law of the Republic of Slovenia;

Your personal information has been collected in relation to a specific offer.

- that you are acquainted with the deadline for storing your personal information;
- You are aware that you have the right to a legal remedy - filing an appeal;
- that you have the right to transfer personal data (applies only to personal data processed automated).

The User may at any time exercise his rights under this item (request, review, supplement, repair or delete his personal data or terminate the processing of personal data, etc.), by e-mail to [contact@principle.network](mailto:contact@principle.network) or [blockchainvalet2018@blockblock.co](mailto:blockchainvalet2018@blockblock.co).

These rights do not relieve you of obligations that you have under the General Terms of Use or have a Principal contract concluded with you.

## **2. Analytics**

- **Google Analytics**

Principle uses Google Analytics, an online analytics tool that helps Principle understand how users use our site so that we can review and improve our Services. Google Analytics collects information anonymously and provides a Principle report with website trends without identifying individual visitors. The site is tracking using Google Analytics in accordance with its privacy policy. If you do not want data that Google Analytics uses, you can choose to stop using it by installing the Google Analytics opt-out browser.

## **3. Third parties**

We may provide links to third party websites or services on our website or in our application. We are not responsible for the practices used by websites or services related to or on the Website / Principle application, including the information or content contained therein.

Remember that if you use a link on the Principle website or within Services that link you to another site or service, our Privacy Policy does not apply to third party websites or services. Your browsing and interaction on any website or the use of third-party services, including those related to our Services, is in accordance with their own policies and policies of those third parties. We are not responsible for the practice of protecting personal information or the content of third party websites.

This Privacy Policy does not create any rights that third parties may claim. It also does not create any rights that third parties may require the disclosure of any personal data relating to users of the Services.

#### **4. Children**

Our services are not for use for minors under 18 years of age. We do not consciously collect personal information from people under the age of 18. In case you find out that we have collected personal information from a person under the age of 18, we will delete such information.

#### **5. Support**

If you have any additional questions or concerns about privacy and have already signed up for the Principle, the best way to get answers is to contact us via email at [contact@principle.network](mailto:contact@principle.network) or [blockchainvalet2018@blockblock.co](mailto:blockchainvalet2018@blockblock.co).

If you submit a support request, we may receive your email address and other information that you provide related to your support request ("Support data"). Support data is used only for support. We will not rent, sell or share your email address unless we have your explicit consent and in the following circumstances:

- (i) Your support information can be shared with our support providers, but only with the purpose of providing support.
- (ii) Your e-mail address and support information may be shared with the intention of enforcing compliance with our licensing agreements, user agreements, in case of responding to legal requirements and at the request of government authorities.
- (iii) Your email address and support information may be shared with a legal successor or in connection with the merger, consolidation, and sale of corporate assets or other

corporate reorganization if the use of your email address is otherwise in accordance with this Privacy Policy.

## **6. Changes to this Privacy Policy**

We may change this privacy policy from time to time. All changes will be listed here and the modified version will replace this version of our privacy policy. The use of the information we collect is subject to the Privacy Policy applicable at the time this information is collected. We will take reasonable steps to draw attention to any changes in our Privacy Policy. Even though it is on a secure site, we recommend that you read this document every time you use the web site to ensure that it still encounters your approval.

If we change how we use the email address, we will notify you in advance by e-mail. Such changes will take effect on the date indicated in the e-mail.

For general or privacy information, please contact us by [contact@principle.network](mailto:contact@principle.network) or [blockchainvalet2018@blockblock.co](mailto:blockchainvalet2018@blockblock.co).

Navipro d.o.o

25.5.2018