

## MOTHERSHIP

### Privacy Policy

*Date of Last Revision: January 31st, 2019*

This Privacy Policy governs processing (e.g. obtaining, recording, storing or disclosing) by Mothership Exchange OÜ (hereinafter „**Mothership**“, „**we**“, „**us**“) of information collected from users („**you**“, „**User**“) of the mothership.cx website („**Site**“) or Mothership app („**App**“) or any of our customer's. This privacy policy applies to the Site, the App, and all products and services offered by us.

Mothership Exchange OÜ is a company registered in the Republic of Estonia with the registration number 14514292.

For further information on how your information is used, how we maintain the security of your information, and your rights to access the information we hold on you, please contact our Data Protection Officer at [gdpr@mothership.cx](mailto:gdpr@mothership.cx).

#### Information we may collect

1. Personal identification information:
  - 1.1. We may collect personal identification information from you in a variety of ways, including, but not limited to, when you register on, visit or use our Site or App, fill out a form, and in connection with other activities, services, features or resources we make available to you on our Site or App.
  - 1.2. We may collect and process your personal details (e.g. your and representative's first name, last name, country of residence, place and date of birth, personal identification code, a copy of identification document and whether you are politically exposed person), contact details (e.g. e-mail address and telegram handle), location details and financial details (e.g. public wallet addresses, ICO contribution ID and amount, transactions and orders, source of funds, and ultimate beneficiaries).
  - 1.3. We will collect personal identification information from you if you voluntarily submit such information to us. If you register at our Site or App, then we may verify and collect the information from public sources and third party service providers. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site or App related activities. Thus, in some cases, we will be unable to render services to you if you do not provide us personal identification information due to the requirements of anti-money laundering laws and other legal acts.
2. Non-personal identification information: we may collect non-personal identification information about you whenever you interact with our Site or App. Non-personal identification information may include browser name and technical information about the your means of connection to our Site or App, such as details of the device used, IP-address, location, date and time of connection, operating system and Internet service providers utilised, and other similar information.
3. Web browser cookies: our Site may use "cookies" to enhance User experience. User's web browser places cookies on their hard drive for record-keeping purposes, and sometimes to track information about them. You may choose to set their web browser to refuse cookies, or to be alerted when cookies are being sent. If you do so, note that some parts of the Site may not function properly. Learn more about the way our Site may use cookies in our Cookie Policy.

## How we use the collected information

Mothership may collect and use your personal information to:

1. Provide customer services (Art 6(1)(b) of the General Data Protection Regulation („GDPR“));
2. Analyse your account activity in order to provide you with an adequate and reliable service (Art 6(1)(b) of the GDPR);
3. Offer and inform you about the best possible options suitable for your needs (Art 6(1)(b) of the GDPR); and
4. Comply with anti-money laundering and other legal obligations (Art 6(1)(c) of the GDPR).

We will ask your separate consent before using the collected information for other purposes, unless other legal ground for processing applies.

We store the collected information for as long as it is necessary to provide products and services to you. The information associated with your account will be kept until your account is deleted, unless we no longer need the data to provide products and services. However, we generally store information on your transactions (and any data associated to it) for 5 years after the deletion of account.

## Marketing

We would like to send you information about products and services of ours if you have consented to receive marketing information. In such case, your consent will be the legal basis for processing your data.

You have a right at any time to stop us from contacting you for marketing purposes by opting out and notifying us at [hello@mothership.cx](mailto:hello@mothership.cx).

## Authorised processors and third party disclosure

Mothership may use other third party authorized processors such as technical service providers, identity verification services, mail carriers, IT companies, communication agencies, and hosting providers to process your data. For example your data may be stored in servers hosted by third party cloud service providers such as Google, which may be located anywhere around the world. The data stored in such servers is secured and cannot be accessed by any third parties. Please contact Mothership to receive and updated list of such authorized processors. Any such authorized processor shall be obliged to adhere to the restrictions set forth in this Privacy Policy.

We may additionally disclose your personal information to other third parties if it is necessary for the purposes of providing, maintaining, reviewing or improving the Services. We will oblige any third party processing your personal information, to carry out the processing in accordance with this Privacy Policy. We sometimes need to share personal information we process with third parties. Where necessary or required, we share information with:

1. Representatives of the person whose personal data we are processing;
2. Financial institutions;
3. Debt collection and tracing agencies;
4. Suppliers and services providers;
5. Government, law enforcement and prosecuting authorities; and
6. Courts and tribunals.

## How we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect from unauthorised access, alteration, disclosure or destruction of your personal information, user credentials, transaction information and data stored on our Site. As soon as we receive your private information, we implement strict security measures and procedures to avoid unauthorised access from any third party. However, transmission of such data over the Internet using personal computers or mobile devices is not completely safe and, therefore, we cannot guarantee absolute security of all information submitted to our platform. Any transmission of such information and documents is at your own risk.

### **Storage and transfers**

The information that we collect from you may be transferred to and stored at a destination outside the European Economic Area, in particular where counterparties to any of the service offered through our Site or App are based outside the European Economic Area. Your information may also be processed by staff and contractors operating outside the European Economic Area who works for us or for one of our suppliers. These countries may be deemed by the Commission to provide adequate level of protection (e.g. United States under Pricavy Shield). We also apply additional safeguards to ensure the protection of your data (e.g. conclude standard data protection clauses as adopted by the Commission, Art 46 (2) (c). In any case, all transfers to countries outside the European Economic Area will be in full compliance with all aspects of the GDPR.

### **Third party links and services**

Please remember that when you use a hyperlink to go from our Site or App to another website or you request a service from a third party, our Privacy Policy no longer applies. Your browsing and interaction on any other website or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies. We do not monitor, control, or endorse the information collection or privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices. This Privact Policy applies solely to information collected by us through our Site, App or services and does not apply to these third party websites and third party service providers.

### **Your rights**

We provide you with access to their personal identification information. You may update or delete such information at any time on their own discretion. We will not keep outdated or deleted information, unless we have to do so for legitimate business purposes or in accordance with legislative or regulatory requirements.

You also have the right to request a copy of information that we hold about you, request to restrict the processing, object to processing as well to receive your personal information in a structured, commonly used and machine-readable format, and to have us transfer your personal information directly to another "controller", where technically feasible, unless exercise of this right adversely affects the rights and freedoms of others. Please submit a written application at [hello@mothership.cx](mailto:hello@mothership.cx). If any of the information that we hold about you is incorrect, you can change it by contacting as at [hello@mothership.cx](mailto:hello@mothership.cx).

If we process your data based on your consent, then you have a right at any time to withdraw your consent using the Site or notifying us at [hello@mothership.cx](mailto:hello@mothership.cx).

If you have a concern about the way we handle your personal information you have a right to lodge a complaint to our data protection officer at [gpd@mothership.cx](mailto:gpd@mothership.cx) or the supervisory authority or turn to the court. For more information on the process please visit the website of the Estonian Data Protection Inspectorate at <http://www.aki.ee/en/what-can-people-demand-regarding-their-data>.

### **Notifications**

Mothership has the discretion to update this Privacy Policy at any time. When we do so, we will post a notification on the main page of our Site and revise the updated date at the top of this page. We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.

### **Changes to this privacy policy**

By using this Site or App, you signal your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use our Site, App or other services. Your continued use of the Site, App or services following the posting of changes to this policy will be deemed as your acceptance of those changes.

### **Cookie Policy**

A cookie is a very small text document or piece of code, which often includes an anonymous unique identifier. When you visit a website or use a mobile application, a computer asks your computer or mobile device for permission to store this file (or similar technologies such as web beacons) on your computer or mobile device and access information from it. Information gathered through cookies or similar technologies may include the date and time of visits and how you are using the Website.

Cookies are used by us as part of this Site. Our Site also uses third party cookies for analytics.

By continuing to use our Site you are deemed to consent to our use of the cookies described in this Cookie Policy. If you do not consent to us using cookies then please read the next section.

### **Blocking our use of cookies**

You can block the use of cookies by activating the relevant settings in your browser.

### **What happens when you block cookies**

In order to use some parts of our Site your web browser will need to accept cookies. If you choose to withhold consent, or subsequently block cookies, some aspects of the Site may not work properly and you may not be able to access all or part of the Site.

### **What we do with cookies**

We use session cookies to allow the Site to uniquely identify your browsing session on the Site, which allows us to coordinate this information with data from the Site server. Such cookies are stored temporarily during a browsing session and are deleted from the user's device when the browser is closed.

We also use persistent cookies that may be saved on your computer for a fixed period and are not deleted when the browser is closed where we need to know who you are for more than one browsing session. For example, we use this type of cookie to store your preferences, so that they are remembered for the next visit, or to keep you logged in if you navigate away.

We may also use cookies where they are essential for the operation of the Site, for example to remember that you are signed in to the Site during your session.

We use “analytics” cookies. These, along with other information, allow us to calculate the aggregate number of people using the Site and which features of the Site are most popular.

We use this information to improve the Site. We do not generally store any personal data that may be provided to us in a cookie.

We use the following types of cookies or similar technologies:

1. Google Analytics (Third Party Cookie) - These cookies enable us to store information such as the time you visit our Site, whether you have visited before and the Site that you visited prior to visiting our Site. For more information about Google Analytics please see: <http://www.google.com/intl/en/analytics/privacyoverview.html>.
2. Twitter, Slack, Telegram and LinkedIn buttons - These cookies enable Users to like or share items in social pages. For more information see respective page privacy policy.
3. Track URL - This cookie informs us which webpage you visited immediately before coming to our Website. It does not collect any personal data or send personal data any third party.
4. Local storage - Local storage is an industry-standard technology that allows a website or mobile app to store and retrieve data on an individual’s computer, mobile phone or other device.