

PRIVACY POLICY

This Privacy Policy is effective starting on May 25, 2018.

We take care of your privacy, that's why we developed this revised Privacy Policy (the "**Policy**"), which is intended to help you understand how AltEstate Limited, a company registered in the British Virgin Islands with company number 1953156, whose registered office is at Geneva Place, Waterfront Drive, PO Box 3469, Road Town, Tortola, British Virgin Islands (the "**Company**" or "**we**"), processes the information about you when you access or use the website <https://alt.estate/> (the "**Website**") and the online services at the Website (the "**Services**").

If you do not agree with this Policy, do not access the Website, do not use our Services or do not interact with any other aspect of our business.

WHAT INFORMATION ABOUT YOU DO WE COLLECT?

§1. Information You Provide to Us

We receive and store information that you provide to us when you create an account and use our Services.

When you create an account, we may collect your personal identification information, including your full name, date of birth, citizenship, e-mail address, phone number, registration or residential address, information about the cryptocurrency wallet addresses to be used for the operations with the Company, and where applicable your Google or Facebook username, and other information if you create an account using your third-party log-in credentials (please see the Article "§4. Information Received from Third Parties" below).

Also, we may collect documents that are used to verify your information specified in preceding Article, e.g. scanned copy of your official photo ID (passport), proof of address, and other documents submitted or transferred by you to the Company.

If you do not provide the information and/or documents set out in the preceding paragraphs or provide inaccurate, misleading, or incomplete information, we may, without any notice to you:

- a) impose limitations and restrictions on your use of the Website and/or the Services; and/or
- b) suspend or terminate your access to the Website, your user account, or the Services.

§2. Information We Collect Automatically

Whenever you access or interact with the Website or use the Services we may automatically receive the following information:

- a) your IP address and location;
- b) information collected by cookies and other similar technologies (please see the Article "§3. Cookies and Similar Technologies" below);
- c) your browser identification information;

- d) information on the device you use to access the Website and the Services, including the hardware model, operating system and version, your web browser, and device identifiers (including a network ID used to communicate with other nodes on the platform);
- e) information contained in, or relating to, any communication that you send to us or send through the Website and data associated with the communication (metadata);
- f) date and time of accessing the Website and the Services;
- g) information of third parties' websites referred the Website or the Services;
- h) information related to your activity in relation to the Services, including search queries history, search results provided to you in response to your query, web pages you visited by reference from the search results.

You may always refuse to supply information about you, though this may prevent you from engaging in certain Website-related activities.

The amount of information collected from you in relation to the operation of the Website and provision of the Services may differ depending on whether you access the Website and the Services logged in to your user account or without logging in.

Unless you are logged in to your user account information about you, such as e-mail address, full name, address, phone number, is not collected when you access the Website or the Services. In the event you access the Website or the Services logged in to your user account, the Company may associate the respective information with your user account.

§3. Cookies and Similar Technologies

We may also use technologies like cookies and other similar technologies. Cookies are small files that can be automatically downloaded to your devices and designated to help websites recognize a user that has visited the website previously such as simplifying the logging in for registered users. Most web browsers automatically accept cookies.

Cookies are sent to your browser from our servers and are stored on your device. Sending a cookie to your browser enables us to collect information about you and keep a record of your preferences when utilizing our services, both on an individual and aggregate basis. For example, we may use these technologies to collect information about how you use the Services, e.g. which pages you go to most often and if you get error messages from certain pages. We may use these technologies to allow us to remember choices you make (such as your user name, language or the region you're in) and tailor the Service to provide enhanced features and content for you. These cookies can also be used to remember changes you've made to text size, font and other parts of webpages that you can customize. The Company or our advertising partners may use these technologies to deliver advertising that is relevant to your interests. These technologies can remember that your device has visited a site or service and may also be able to track your device's browsing activity on websites or services other than ours. This information may be shared with organizations outside the Company, such as advertisers and/or advertising networks to deliver the advertising, and to help measure the effectiveness of an advertising campaign. We may use these technologies to understand, improve, and research our Services.

The period of time a cookie will stay on your device depends on whether it is a "persistent" or "session" cookie. Session cookies will be on your device until you stop browsing. Persistent cookies stay on your device until they expire or are deleted.

You can control cookies and opt-out of our use of cookies by changing your browser settings, though this may prevent you from engaging in certain Website-related activities.

You will not be able to opt-out of any cookies or other technologies that are "strictly necessary" for access to the Website or use of the Services.

§4. Information Received from Third Parties

We may receive information about you from third parties with services that interact with the Services or that provide services to us, such as unaffiliated apps and websites, websites and applications offered by third-party developers that integrate with our API, advertising exchanges, ad platforms, ad networks or from our partners. This information may include information about your activity when using the Services or on unaffiliated websites and apps, or information about you received from web browsers or operating systems such as browser types and settings, the operating systems, device models, carriers, location information, IP address, mobile device and advertising identifiers (e.g. Apple IDFA or Google Advertising ID), as well as cookie information, pixel or other similar technology. If you created your account using your Google or Facebook account profile, we may receive certain information from it, such as your full name, gender, date of birth, email address and your Google or Facebook ID.

HOW IS MY INFORMATION USED?

We collect the information about you as part of the operation of the Website and the Services, and may use it for the following purposes:

- a) administration and development of the Website and the Services;
- b) enhancement of user experience, including the provision of personalized Services and improvement of the Website and the Services;
- c) development of new products, utilities, and offerings;
- d) detection, investigation, and prevention of fraudulent transactions and other illegal activities and protection of your rights and rights of Company Parties;
- e) collection, processing and performing statistical and other research and analysis of information for enhancement of the Website and the Services;
- f) communication with you about products, services, promotions, events and other news and information we think will be of interest to you; and
- g) verifying compliance with the terms of use of the Website available on the Website.

WHEN IS MY INFORMATION SHARED?

We may share your information, including personal identification information in the following cases:

- a) you've consented or otherwise given us permission to share;
- b) with service providers that perform work for us (such as hosting providers, identity verification, support, payment, and email service providers);
- c) with counterparties with which we cooperate (e.g. banks and cryptocurrency exchanges) and that are AML/CTF obliged entities or comply with AML/CTF rules;
- d) when you use interactive areas of the Services, like our blog or other online forums, certain information you choose to share may be displayed publicly, such as your username, actions you take and any content you post;
- e) in response to a request for information if we believe disclosure is in accordance with any applicable law, regulation or legal process;
- f) if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of Company or others;
- g) in connection with, or during negotiations of, any merger, sale of the Company's assets, financing or acquisition of all or a portion of our business by another company; and
- h) between and among affiliated companies and, in some cases, with prospective affiliates.

We may share aggregated or de-identified information, which cannot reasonably be used to identify you.

You should bear in mind that the transactions on the blockchain network are public, so anyone can see them.

HOW IS MY INFORMATION PROTECTED?

We take appropriate security, administrative, and technical measures to protect any information you provide regarding the collection, storage, and processing, as well as security measures to protect your user account against unauthorized access, modification, disclosure or destruction of your personal identification information.

Any transactions on the blockchain network are public and we cannot exclude transaction data from the blockchain.

HOW LONG IS MY INFORMATION KEPT?

§1. User Account Information

We retain your information so long as your user account is active. We also retain your information beyond this period as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations and to continue to develop and improve our Services. Where we retain your information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we

only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.

The information on the period of time cookies stay on your device is specified above.

§2. Marketing Information

If you have decided to receive marketing information from us, we retain information about your marketing preferences unless you specifically ask us to delete such information.

HOW DO I ACCESS OR DELETE MY INFORMATION?

§1. Access and Update Your Information

Our Services allow you to access and update certain information about you within your user account. You can update your profile information within your profile settings and modify content that contains information about you, for example, your name, email address, phone number, cryptocurrency wallet addresses, or you may replace scanned copy of your official photo ID (passport), proof of address, or any additional documents submitted by you to the Company with a new one.

§2. Delete Your Information

You may ask to delete your user account by contacting us at ask@alt.estate.

§3. Opt-Out of Communications

You may opt out of receiving promotional materials from us by using the unsubscribe link within each email or by contacting us as provided below to have your contact information removed from our promotional email list or registration database.

WHAT LEGAL RIGHTS DO I HAVE?

Subject to applicable law, you may have a number of rights regarding the processing of your information, including:

- a) the right to request access to, or rectification or erasure of your information that we process;
- b) the right to request restriction of processing of your information by us, or to object to processing;
- c) where we process your information on the basis of your consent, the right to withdraw that consent; and
- d) the right to file a complaint with a data protection authority regarding the processing of your information by us.

CHILDREN UNDER 13

Neither the Website nor the Services are intended to be used by individuals under 13 years of age. We do not knowingly collect any information from children under 13. If you notice or suspect that any Website or Services user is under 13, please contact us immediately at ask@alt.estate.

HOW WILL WE NOTIFY YOU ABOUT CHANGES TO THIS POLICY?

We may update this Policy from time to time. We recommend that you frequently check this Policy to find any changes and stay informed about how we help protect your information.

We will notify you before we make changes to this Policy for you to have the opportunity to review the revised Policy before you choose to continue using our Services.

CONTACT US

We welcome your questions and suggestions with respect to the processing of your information. Please use this e-mail for communicating with us: ask@alt.estate.