



PRIVACY AND COOKIES POLICY

1. INTRODUCTION AND GENERAL TERMS

PLEASE READ THIS PRIVACY AND COOKIES POLICY CAREFULLY BEFORE USING THIS WEBSITE, OUR PRODUCTS, SERVICES OR PLATFORM.

This document outlines the privacy and cookies policy ("**Privacy and Cookies Policy**" or "**Policy**") of Eligma Ltd. ("**Eligma**", "**Company**", "**we**", "**our**" or "**us**"), which is committed to protecting your and your family's personal information when you are using our services. Your privacy is important to us. We've created this Policy which together with our Terms of Use ("**Terms of Use**") cover how we collect, use, disclose, transfer and store your data. We want our services to be safe and enjoyable environments for our customers and we want to provide you with the most user- friendly online navigation experience. In order to make this happen we sometimes need to collect information about you. The term "**you**" is defined by the user or a client of Elipay website (available at: <https://www.elipay.com>) ("**the Website**") and Eligma respectively.

This Privacy and Cookies Policy relates to our use of any personal information **we collect from you** via our Website or any personal information **you provide to us** according to our or legal requirements.

We are committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including Slovenian Personal Data Protection Act (Zakon o varstvu osebnih podatkov) and the The EU General Data Protection Regulation – GDPR (Regulation EU 2016/679), which replaces the Data Protection Directive 95/46/EC.

Please also review our Terms of Use, which constitute the agreement between you and Eligma when you are only using the Website and read them collectively.

BY USING THE WEBSITE, YOU AGREE TO THE COLLECTION AND USE OF YOUR INFORMATION IN ACCORDANCE WITH THIS PRIVACY AND COOKIES POLICY. WITH FURTHER USAGE OF THE WEBSITE YOU INDICATE YOUR CONSENT TO OUR PRIVACY POLICY. IF YOU DO NOT AGREE WITH THIS PRIVACY AND COOKIES POLICY, YOU ARE NOT AUTHORIZED TO ACCESS AND USE THE WEBSITE AND YOUR SOLE RECOURSE IS TO NOT USE THE WEBSITE.

2. WHO ARE WE?

Eligma Ltd. is a company incorporated and registered in Slovenia with registration number 8106452000 and registered address at Letalska cesta 33F, SI- 1000 Ljubljana, Slovenia, EU and will be the creator of the Elipay system. If you need to contact us in relation to this Privacy and Cookies Policy, please email us at: support@elipay.com.

We are developing Elipay ("**Elipay**"), a transaction system that enables customers to purchase goods and services with selected cryptocurrencies at any store that accepts Elipay as a payment option. As its "testing lab", Eligma has selected BTC City, the largest Slovenian shopping, business and entertainment center, which consists of more than 450 different shops, bars, restaurants, etc. and attracts more than 21 million visitors a year..

Eligma also has its own Platform ("**Eligma Platform**") which includes any other services Eligma may provide in the future and which may be at a later stage available to its users. For a more detailed description of the Eligma Platform, please refer to our Website (available at: <https://www.eligma.io>) and/or the Eligma whitepaper (available at: https://www.eligma.io/pdf/eligma-white-paper_v1.1.pdf) ("**Whitepaper**").

3. WHAT INFORMATION DO WE COLLECT ABOUT YOU AND HOW DO WE USE THEM?

In order to provide you with the full range of Website services and Eligma related services, we sometimes need to collect information about you.

3.1. INFORMATION YOU GIVE US

When you subscribe to our newsletter, participate in discussion boards, live chats or other social media functions on our site, filling in forms on the Elipay website or by corresponding with us by phone, e -mail or otherwise, and when you report a problem with the Website, we collect and store your contact information on the basis of your consent, which may include your name, email address, phone number, address and other information provided.

In case you want to participate in our Elipay system testing and undergo our KYC Procedure (as defined in the General terms of Use of the Elipay Test System) we will also require you to provide additional personal information ("**Personal Information**"), such as date and place of birth, nationality, personal identification number, copy of your identification documents, permanent and temporary residence address,

information about your occupation and source of your funds, payment details, Elipay app usage information and other similar data, which is used for identification purposes and which we may be required to collect to comply with applicable laws. We may also obtain information about you from third parties (“**Third parties**” or “**Third party websites**”), such as identity verification services. We may also ask you for additional government- issued identification or other information to validate your identity as required by our policies and procedures. We collect and store your Personal Information on the contractual basis or on the basis of legitimate interests. It is a reasonable and proportionate procedure and the collected personal data involves only limited and necessary information.

3.1.1. HOW WILL WE USE THIS INFORMATION?

- to carry out our obligations, arising from any agreements entered into between you and us and to provide you with the information and services that you request from us;
- to promote safety and security (we use personal information for loss prevention, antifraud, anti-money laundering, and/or prevent unauthorized activity and to enforce this Privacy and Cookies Policy to mitigate the risk of fraud, criminal activities or identity theft
- to create anonymous, aggregated and/or other de-identified data records (“**Anonymous Information**”) from information that you provide to us by excluding information (such as your name) that makes the information personally identifiable to you. We use this Anonymous Information to analyse request and usage patterns, so that we may improve Website navigation. We reserve the right to use Anonymous Information for any purpose at our discretion;
- to provide you with information about other goods and services we offer (if you gave us your consent);
- to notify you about changes to our service (if you gave us your consent);
- to ensure that content from our site is presented in the most effective manner for you and for your computer;.

3.2. INFORMATION WE COLLECT ABOUT YOU

With regard to each of your visits to the Website, a contractual relationship is created between you and us. Based on that contractual relationship or based on your consent we collect the following information:

- **Server Log Information:** We collect server log information when you use the Website, which may include but is not limited to the date and time of visits,

the pages viewed, your IP address, time zone setting, time spent at our Website and the websites you visit just before and just after you visit our Website, clickstream to, through and from our site (including date and time), information you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs).

- **Device Information:** We collect information about the computer or mobile device you use to access the Website, including the hardware model, operating system and version, the web browser you use, and other device identifiers.
- **Telemetry Information:** If you use any of our open source software, we may collect bandwidth upload and download speeds, the amount of free and used storage space on your device and other statistics about your device.
- **Usage Information:** If you use the Website, we will collect metadata about the files you upload.

3.2.1. HOW WILL WE USE THIS INFORMATION?

- to administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve the Website to ensure that content is presented in the most effective manner for you and for your device;
- as part of our efforts to keep the Website safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of the Website about services that may interest you or them;
- to carry out our obligations, arising from any agreements entered into between you and us and to provide you with the information and services that you request from us;
- to promote safety and security (we use personal information for loss prevention, antifraud, anti-money laundering, and/or prevent unauthorized activity and to enforce this Privacy and Cookies Policy to mitigate the risk of fraud, criminal activities or identity theft).

3.3. INFORMATION WE RECEIVE FROM OTHER SOURCES

The Website uses cookies, as defined in Section 10 (“**Cookies**”) and Web beacons (“**Web beacons**”) to improve your experience while visiting the Website. Where applicable the Website uses a cookie control system, allowing you to give explicit permission or to deny the use of / saving of Cookies on your computer / device. (see in Section 10). We collect and process this information based on your consent.

3.3.1. HOW WILL WE USE THIS INFORMATION?

We will combine this information with information you give to us and information we collect about you and (depending on the types of information we receive) use it as described in Sections 3.1.1 and 3.2.1.

3.4. INFORMATION COLLECTED BY OTHERS

Our Website contains hyperlinks to websites owned and operated by Third parties to process your information on our behalf, for example to provide services or analysis (such as Google Analytics) and identity verification services. These Third party websites have their own privacy policies, and are also likely to use Cookies, and we therefore urge you to review them.

WE DO NOT ACCEPT ANY RESPONSIBILITY OR LIABILITY FOR THE PRIVACY PRACTICES OF SUCH THIRD PARTY WEBSITES AND YOUR USE OF SUCH WEBSITES IS AT YOUR OWN RISK.

3.4.1. HOW WILL WE USE THIS INFORMATION?

The information collected by these Third parties may be used for purposes disclosed in their privacy policies. The information collected by these Third parties can be used by us to offer our services only by your consent or to comply with legal and regulatory requirements.

4. WHAT ARE THE CONSEQUENCES WHEN YOU DON'T PROVIDE US WITH REQUIRED INFORMATION?

In order to be eligible to participate in the Elipay system testing you enter into a binding agreement with Eligma. In case you don't provide us with the required

information, we are not bound by the agreement with you and in this case you couldn't complete the KYC Procedure and/or participate in the Elipay system testing.

5. HOW WILL WE PROTECT YOUR PERSONAL INFORMATION?

We are committed to protecting the personal information we collect when you use the Website, participate in the Elipay system testing and use other services. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centres, and information access authorization controls. We also authorize access to personal information only for those employees, who require it to fulfil their job responsibilities. We take reasonable steps to protect the security of the information communicated through the Website.

However, no computer security system is entirely fool proof and the Internet is not a secure method of transmitting information. As a result, we do not assume any responsibility for the data you submit to or receive from us through the Internet or for any unauthorized access or use of that information and we cannot and do not guarantee that information communicated by you to us or sent to you by us will be received or that it will not be altered before or after its transmission to us. You agree to not hold us and our respective past, present and future employees, officers, directors, contractors, consultants, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns (collectively, "**Eligma Parties**") liable for any loss or damage of any sort incurred as a result of any misappropriation, interception, modification, deletion, destruction or use of information provided through the Website.

6. WILL WE SHARE YOUR PERSONAL INFORMATION WITH ANYONE ELSE?

The data that we collect from you is stored within the territories of the European Union. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

We take your privacy very seriously and will keep your information within our company except where disclosure is absolutely necessary, required and permitted by law (for example to government bodies and law enforcement agencies), or if you expressly allow us to do so.

However, we may share some data with Third party sites (e.g. Facebook, Google, Instagram, Twitter), if they are trusted and/or under a non-disclosure agreement with us, with appropriate security measures, to show you relevant advertising on third party sites, as set out in Section 8.

6.1. You agree that we have the right to share your personal information with:

- any member of our group, which means our subsidiaries and our ultimate holding company and its subsidiaries;
- fraud and crime prevention agencies for the purpose of assessing the risk of crime, fraud and money laundering and this is a condition of us entering into any contract with you or any other governmental authorities;
- our banking partners or financial institutions;
- business partners, suppliers and sub-contractors for the performance of any agreement we enter into with them or you;
- analytics and search engine providers that assist us in the improvement and optimization of our site;
- legal entities that we are interested in merging with or be acquired by.

6.2. We will disclose your personal information to Third parties:

- as required by law;
- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- if Eligma, or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce our agreements; or to protect the rights, property, or safety of Eligma, our customers, or others. This includes exchanging information with other companies and organizations
- for the purposes of fraud protection and credit risk reduction;
- to avoid crime, money laundering and the risk of fraud;
- to ensure that we have relevant information on persons wishing to contribute to our Elipay system testing;

7. WILL WE USE YOUR CONTACT INFORMATION FOR MARKETING PURPOSES?

We operate an email mailing list program (“**Newsletter**“), used to inform subscribers about products, services and / or news we supply / publish and we will only send you marketing emails or contact you on our platform where you have agreed to this. You can subscribe through an online automated process, where you have given your explicit permission. Your personal details are collected, processed, managed and stored in accordance with the regulations listed above. You can unsubscribe at any time. In this case please send us email at: support@elipay.com. The type and content of marketing messages you receive, and if they may contain Third party content, is clearly outlined at the point of subscription.

Email marketing messages may contain tracking beacons / tracked clickable links or similar server technologies for tracking your activity within email marketing messages. Where used, such marketing messages may record a range of subscriber data relating to engagement, geographic data, demographics and already stored personal data.

8. WHO IS RESPONSIBLE FOR SHARING OUR WEB CONTENT TO OTHER SOCIAL MEDIA PLATFORMS OR VISITING EXTERNAL WEB LINKS THROUGHOUT OUR WEBSITE?

8.1. SOCIAL MEDIA USAGE & SHARING FEATURES

There may be instances, where the Website features social sharing buttons, which help share web content directly from web pages to respective social media platforms, links to social media and other integrated tools. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page. You can find further information about social media privacy and usage policies on their own websites.

While we may have official profiles on social media platforms, you are advised to verify authenticity of such profiles before engaging with or sharing information with such profiles. We will never ask for your passwords or personal details on social media platforms. You are advised to conduct yourself appropriately when engaging with us on social media.

8.2. EXTERNAL WEBSITE LINKS & THIRD PARTIES

Although we only look to include quality, safe and relevant external links, you are advised to adopt a policy of caution before clicking any external web links, mentioned

throughout the Website (external links are clickable text / banner / image links to other websites).

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. You should therefore note, that you click on external links at your own risk and that we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

IF YOU FOLLOW A LINK TO ANOTHER WEBSITE, YOU WILL LEAVE THE WEBSITE AND THIS PRIVACY AND COOKIES POLICY WILL NOT APPLY TO YOUR USE OF AND ACTIVITY ON THOSE OTHER WEBSITES.

9. WHAT RIGHTS DO YOU HAVE REGARDING HOW WE PROCESS YOUR DATA?

9.1. CAN YOU DELETE YOUR DATA? CAN YOU FIND OUT WHAT PERSONAL INFORMATION ELIGMA HOLDS ABOUT YOU?

Under the GDPR you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. You have the right to access information held about you.

We will use reasonable efforts consistent with our legal duty to supply, correct, update or erase personal information about you on our files. Please address requests and questions about this or any other question about this Privacy and Cookies Policy to our support team via support@elipay.com.

9.2. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with our Company and/or in any applicable legislation. If you request for a deletion of your personal information, then we are bound to comply with applicable legislation and the remaining information is anonymised for analytical purposes.

Where you participate in the Elipay system testing please refer to our Elipay system Privacy Policy for further information about how long we may store such information.

10. COOKIES

10.1.WHAT ARE COOKIES?

Cookies are small files, saved to your computer through your web browser that track, save and store information about your interactions and usage of the Website. They allow us to provide you with a tailored experience within the Website. If you wish to deny the use and saving of Cookies to your computer, you should take the necessary steps within your web browser security settings to block all Cookies from the Website and its external serving vendors or use the cookie control system upon your first visit. If you continue without changing your settings, we'll assume that you are happy to receive all Cookies on the Eligma website. However, you can change your cookie settings at any time.

Web beacons are graphic images that are placed on a website or in an email that is used to monitor the behaviour of the user visiting the website or sending the email. They are often used in combination with Cookies.

It is important to note that if you change your settings and block certain Cookies, you will not be able to take full advantage of some features of Eligma services, and we might not be able to provide some features you have previously chosen to receive.

10.2. WHICH COOKIES DO WE USE?

Detailed information about which Cookies does Eligma use can be found in Schedule 1.

WHAT HAPPENS WHEN WE DECIDE TO MAKE SOME CHANGES TO THIS PRIVACY AND COOKIES POLICY?

This Privacy and Cookies Policy may be updated from time to time so you may wish to check it each time you submit personal information to the Website. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use our Website and do not submit any personal information to Eligma. You can also delete your personal data at any time – please see Section 9 for details. If material changes are made to the Privacy and Cookies Policy, for instance affecting how we would like to use your personal information, we will provide a more prominent notice (including, for certain services, email notification of Privacy and Cookies Policy changes).

12. OTHER CONTRACTUAL MATTERS

All remaining contractual matters in regard to the governing law, severability, term, force majeure and other contractual matters are governed by the Terms of Use, which are available on the Website, respectively.

13. CONTACT INFO

If you need to contact us in relation to this Privacy and Cookies Policy, please email us at:

support@elipay.com..

Eligma Ltd. (May 2018)

SCHEDULE 1

Cookie name	What is it for?	Type	Duration	Domain
IDE	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the use.	Third party	1 year	.doubleclick.net
PREF	he PREF cookie may store your preferences and other information, in particular your preferred language (e.g. English), how many search results you wish to have shown per page (e.g. 10 or 20), and whether or not you wish to have Google's SafeSearch filter turned on.	Third party	9 months	.youtube.com
VISITOR_INFO1_LIVE	A cookie that YouTube sets that measures your bandwidth to determine whether you get the new player interface or the old.	Third party	8 months	.youtube.com
YSC	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Third party	At the end of the session	.youtube.com
APID	Unclassified	Third party	1 year	.advertising.com
B	Collects anonymous data related to the user's website visits, such as the number of visits, average time spent on the website and what pages have been loaded. The registered data is used to categorise the users' interest and demographical profiles with the purpose of customising the website content depending on the visitor.	Third party	1 year	.yahoo.com
BizoID	LinkedIn Ad analytics	Third party	6 months	.ads.linkedin.com
IDSYNC	Unclassified	Third party	1 year	.advertising.com
UserMatchHistory	LinkedIn Ad analytics	Third party	6 months	.ads.linkedin.com
_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	First party	2 years	.elipay.com
_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	First party	At the end of the session	.elipay.com
_hjIncludedInSample	Determines if the user's navigation should be registered in a certain statistical place holder.	First party	At the end of the session	.elipay.com
anj	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads.	Third party	3 months	.adnxs.com
bcookie	Used by the social networking service, LinkedIn, for tracking the use of embedded	Third party	2 years	.linkedin.com

	services.			
c	Regulates synchronisation of user identification and exchange of user data between various ad services.	Third party	1 year	.bidswitch.net
fr	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	Third party	3 months	.facebook.com
guest_id	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website and which pages have been loaded, with the purpose of personalising and improving the Twitter service.	Third party	2 years	.twitter.com
lang	Remembers the user's selected language version of a website	Third party	At the end of the session	.ads.linkedin.com
lidc	Used by the social networking service, LinkedIn, for tracking the use of embedded services.	Third party	At the end of the session	.linkedin.com
personalization_id	Unclassified	Third party	2 years	.twitter.com
sa-user-id	Unclassified	Third party	5 years	.srv.stackadapt.com
sa-user-id-v2	Unclassified	Third party	5 years	.srv.stackadapt.com
sess	Used to check if the user's browser supports cookies.	Third party	At the end of the session	.adnxs.com
tuuid	Registers whether or not the user has consented to the use of cookies.	Third party	1 year	.bidswitch.net
tuuid_lu	Unclassified	Third party	1 year	.bidswitch.net
uuid2	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads.	Third party	3 months	.adnxs.com
zuid	Unclassified	Third party	1 year	.zemanta.com
1P_JAR	Unclassified	Third party	1 month	.google.si
CONSENT	Unclassified	Third party	20 years	.google.si
NID	Unclassified	Third party	5 months	.google.si