

PRIVACY POLICY

About this Privacy Policy

1. This is the Privacy Policy for X-Block Foundation Ltd. (“X-Block”). In this Privacy Policy, “we”, “us” or “our” refers to X-Block.

General

2. We will only use your personal data where you have given us your consent and in the manner set out in this Privacy Policy.
3. This Privacy Policy sets out the manner in which we collect, use, disclose and process your personal data when you:
 - 3.1. access or use our website and mobile applications (“**Applications**”) and services; and/or
 - 3.2. provide us with your personal data, regardless of the medium through which such personal data is provided.
4. By providing us with your personal data, you consent to our collection, use, disclosure (including transfer) and processing of your personal data in accordance with this Privacy Policy. Please DO NOT provide any personal data to us if you do not accept this Privacy Policy.

Amendments to this Privacy Policy

5. We may amend this Privacy Policy from time to time without notice to you. The updated Privacy Policy will supersede earlier versions and will apply to personal data provided to us previously. The updated Privacy Policy will be made available upon request from us and on our Applications. If you do not accept any amendment to the Privacy Policy, please contact our Data Protection Officer (see paragraph 26 below).

How do we collect information?

6. **What is personal data.** “Personal data” is data that can be used to identify a natural person.
7. We collect personal data that is relevant to our business relationship with you. We may collect your personal data directly or indirectly through various channels, such as when:
 - 7.1. you provide us with your personal data for whatever reasons;
 - 7.2. you authorise us to obtain your personal data from a third party;
 - 7.3. you register your interest for the purpose of being whitelisted as a potential acquirer of the tokens we offer for sale;
 - 7.4. you register for a user account on our Applications;
 - 7.5. you use our Applications and services;
 - 7.6. you contact us or interact with our employees through various communication channels, for example, through social media platforms, messenger platforms such as Telegram, face-to-face meetings, telephone calls, emails, fax and letters;
 - 7.7. you transact with us, contact us or request that we contact you;
 - 7.8. you request to be included in an email or our mailing list;
 - 7.9. your images are captured via CCTV cameras while you are within our premises;
 - 7.10. your images are captured via photographs or videos taken by us or our representatives when you attend events organised by us; and/or
 - 7.11. you submit an employment application or when you provide documents or information including your resume in connection with any employment application.
8. Our Applications may contain certain technologies that collect data in the manner described in this Privacy Policy (see paragraph 25 below) or the applicable terms and conditions.

9. **Voluntary provision of personal data.** Your provision of personal data to us is voluntary and you may withdraw your consent for us to use your personal data at any time. However, if you choose not to provide us with the personal data we require, it may not be possible for us to contact you, or provide products or services which you need from us.
10. **Providing personal data belonging to others.** In certain circumstances, you may also provide us with personal data of persons other than yourself. If you do so, you warrant that you have informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes. You agree to indemnify and hold us harmless from and against any and all claims by such individuals relating to our collection, use and disclosure of such personal data in accordance with the terms of this Privacy Policy.
11. **Accuracy and completeness of personal data.** You are responsible for ensuring that all personal data that you provide to us is true, accurate and complete. You are responsible for informing us of any changes to your personal data.

How do we use your information?

12. Generally, we collect, use or disclose your personal data for one or more of the following purposes:
 - 12.1. provide you with products and/or services that you request for;
 - 12.2. managing your relationship with us;
 - 12.3. facilitating your use of our Applications;
 - 12.4. to resolve any disputes, investigating any complaint, claim or dispute or any actual or suspected illegal or unlawful conduct;
 - 12.5. assisting you with your enquiries, and to respond to your feedback, complaints and requests;
 - 12.6. to notify you of our products, services, programs and events;
 - 12.7. to process your job application and assess your suitability for the position applied for;
 - 12.8. to manage the safety and security of our premises and event premises (including but not limited to carrying out CCTV surveillance and conducting security clearances); and/or
 - 12.9. any other reasonable purposes related to the aforesaid.
13. **Business purposes.** We may also use your personal data for purposes connected or relevant to our business, such as:
 - 13.1. complying with our legal obligations and requirements;
 - 13.2. complying with international sanctions and applicable regulation for securities and to counter money-laundering or financing of terrorism;
 - 13.3. enforcing obligations owed to us, and contractual terms and conditions;
 - 13.4. carrying out market expansion plans, research, data analysis, testing, research, statistical and survey purposes;
 - 13.5. staff training; and/or
 - 13.6. any other reasonable purposes related to the aforesaid.
14. **Marketing.** If you have consented, we may use your personal data, from time to time, for additional purposes such as to inform you of our products, services, programs and events, and to inform you of the latest activities, special offers and promotions offered by our strategic business partners and associates.

How do we protect your personal data?

15. We will take reasonable precautions to safeguard your personal data.
16. While reasonable precautions will be taken to ensure that the information you provide is protected against unauthorized or unintended access, we cannot be held responsible for

unauthorized or unintended access that is beyond our control, such as hacking or cybercrimes.

How long do we retain your personal data for?

17. We will keep your personal data for so long as we need the personal data for our business and legal purposes.

Third Party Disclosure

18. We do not sell, trade, or otherwise transfer your personal data to third parties without your consent.
19. **Consent for disclosure to third parties.** If you have consented to our disclosure of your personal data to our strategic business partners and associates, we may disclose your personal data to them. They will use your personal data only for the purposes you have consented to.
20. **Disclosure to service providers.** You agree that we may disclose or share your personal data with third parties such as:
 - 20.1. service providers and data processors working on our behalf and providing services to us such as conducting know-your-clients checks, accounting, data processing or management services, website hosting, maintenance and operation services, e-mail message services, analysis services, handling of payment transactions, marketing etc; and
 - 20.2. our consultants and professional advisors (such as accountants, lawyers, auditors).
21. We may also disclose your personal data as required or permitted by law, including to regulatory authorities, statutory bodies, public agencies or law enforcement, or to enforce our site policies or protect our or others' rights, property or safety.

Transfer of personal data to another country

22. You fully understand and unambiguously consent that we may transfer your personal data to any country for the purposes set out above.
23. **Protection of your personal data.** If we transfer your personal data to another country or territory, we will ensure that the recipient of the personal data protects your personal data to the same level as we have committed to protecting your personal data. Where these countries or territories do not have personal data protection laws that are comparable to the laws applicable to our relationship with you, we will enter into legally enforceable agreements with the recipients.

Third Party Websites

24. Our Applications may contain links to other websites that are not owned or maintained by us. These links are provided only for your convenience. This Privacy Policy only applies to our Applications. When visiting these third party websites, you should read their privacy policies.

Automatic Data Collection Technologies

25. We use Automatic Data Collection Technologies on our Applications. Examples of such technologies include:
 - 25.1. **Cookies (or browser cookies).** Cookies are small text files which are set by a website or application operator so that your browser or device may be recognized. We may make use of cookies on our Applications to store and track information such as the number of users and their frequency of use, profiles of users and their online preferences. Cookies do not capture information which would personally identify you,

but the information collected may be used to assist us in analyzing the usage of our Applications and to improve your online experience with us. You can disable the cookies by changing the setting on your browser. However, this may affect the functionality of the Applications.

- 25.2. **Flash cookies.** Certain features of our Applications may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Applications. In contrast to normal cookies, these cookies are not created and saved by the web browser but are governed by the Adobe Flash plug-in. These can contain more information than normal cookies and cannot be deleted or disabled via the browser; this is only possible using tools such as the Adobe Flash Player website. You can also obtain more information about these cookies on their website.
- 25.3. **Third Party Use of Cookies and other Tracking Technologies.** Some content or applications on the Applications, including advertisements, are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Applications. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.
- 25.4. **Web Tracking Beacons and tracking links.** Web beacons (also known as pixel tags and clean GIFs) involve graphics that are not apparent to the user. Tracking links and/or similar technologies consist of a few lines of programming code and can be embedded in our website or our (mobile) applications. In conjunction with cookies, these are primarily used for statistical analysis purposes. This technology can also be used for tracking traffic patterns on websites, as well as finding out if an e-mail has been received and opened and to see if there has been any response.
- 25.5. **Google Analytics.** Web analytics is the term given to a method for collecting and assessing the behavior of visitors to websites and mobile applications. This includes the analysis of traffic patterns in order, for example, to determine the frequency of visits to certain parts of a website or mobile application, or to find out what information and services our visitors are most interested in. The web analytics services on our Applications are provided by Google Analytics. If you do not allow Google Analytics to collect and assess information about your behavior at our Applications, you can install the Google Analytics opt-out browser add-on.
- 25.6. **Facebook Pixel.** A Facebook pixel is a code that is placed on websites for the purpose of tracking conversions from Facebook advertisements, optimize advertisements based on collected data, build targeted audiences for future advertisements and remarketing our products and/or services to qualified leads (i.e. when you done something on our Applications). A Facebook pixel works by placing and triggering cookies to track users as they interact with our Applications and our Facebook advertisements.

Your rights

26. **Contact Data Protection Officer.** If you wish to withdraw any consent you have given us at any time, or if you wish to correct or have access to your personal data held by us, or if you do not accept any amendment to this Privacy Policy, please contact our Data Protection Officer:

Email : contact@x-block.io

27. **Fee for access.** We may charge you a fee for responding to your request for access to your personal data held by us, or for information about the ways in which we have (or may have) used your personal data in the one-year period preceding your request. If a fee is to be charged, we will inform you of the amount beforehand and respond to your request after payment is received. We will endeavor to respond to your request within thirty (30) days, and if that is not possible, we will inform you of the time by which we will respond to you.
28. **Effect of withdrawal of consent.** In many circumstances, we need to use your personal data in order for us to provide you with products or services that you require. If you do not provide us with the required personal data, or if you withdraw your consent to our use and/or disclosure of your personal data for these purposes, it may not be possible for us to continue to serve you or provide you with the products and services that you require.