

Vitalcoin Privacy Policy

Last updated: January 23, 2019

This Privacy Policy describes the ways Vitalcoin (“we”, “us” or “our” as appropriate) collects, stores, uses and manages the information you provide to us or we collect in connection with your use of the Website.

BY SUBMITTING YOUR INFORMATION TO US AND USING THE WEBSITE YOU AGREE TO THIS PRIVACY POLICY and the processing of your Information, including your Personal Data, in the manner provided in this Policy.

If you do not agree with the terms of this Policy please do not use the Website.

1. Definitions

- “**Terms**”, means the [Vitalcoin Terms of Use](#), including Exhibit A ‘Certain Risks Relating to Acquisition, Use, Holding, Sale or Transfer of VTC’.
- “**User**”, “**you**” means a person using the Website.
- “**Website**”, means the website accessible at <https://vitalcoins.io/>, including its subdomains, programming code, related technologies, know-hows, databases and design.
- “**Personal Data**” means information or its combination that can be used to identify you as an individual, such as, for example first and last name.
- “**Usage Data**” means non-personally identifiable information about your usage of the Website that alone or in combination with similar information cannot be used to identify you.
- “**Information**” means collectively any Personal Data, Usage Data, information you made publicly available and/or any other protected or publicly available information.

2. Personal Data

To access and use the Website, undergo a KYC check according to the **Vitalcoin KYC Policy**, participate in Vitalcoin coin sale event and for other purposes that will be mentioned further in this Policy we may process and/or collect the following Personal Data (by the way of example):

- First and last name;
- Email address;
- Address;
- Date of birth;
- ID, residency and source of funds verification documents (e.g. copies of a passport/ID card and utility bills) and data contained in such documents (e.g. home or another physical address, phone/mobile number, gender).

You may explicitly decline to submit Personal Data in which case we may not be able to provide certain or all our services and products to you.

3. Usage Data

For you to access and use the Website we collect Usage Data from your computer, mobile device and browser when you use the Website.

We (through the use of Google Analytics and/or other analytics services) automatically collect Usage Data, such as (by the way of example):

- Your IP address;
- The type of device you use;
- ID or serial numbers of your device;
- Browser type, version and language;
- Type and version of your operating system;
- The number and frequency of visitors to the Website.

We also collect and log a record of all internet communications, details of transactions you carry through the Website, details of your activities and details of your visits to the Website.

4. Cookies and Other Tracking Technologies

A cookie is a small piece of text sent to your browser by a website you visit. It helps the Website to remember information about your visit. That can make your next visit easier and the site more useful to you.

We use both session cookies and persistent cookies. A persistent cookie remains after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the Website. Persistent cookies can be removed by following your web browser help file directions. Session cookies are temporary and typically disappear after you close your browser.

We use our own cookies (first party cookies):

- To remember your choice about cookies on the Website.
- To recognize you when you visit the Website.
- To remember your preferences.
- To perform security measures.

In addition, we work with reputable companies who can use their cookies when you use the Website (third party cookies). Third-party cookies are used, for example, to count how many visitors we receive to a page, to help us analyze how the Website is used (e.g. Google Analytics cookies). We use the information to compile reports and to help us improve the Website. The cookies collect information in an anonymous form, including the number of visitors to the Website, where visitors have come to the Website from and the pages they visited.

Most web browsers allow some control of most cookies through the browser settings. You may be able to reset your web browser to refuse all cookies or to indicate when a cookie is

being sent. However, some features of the Website may not function properly if the ability to accept cookies is disabled.

If you choose to use the Website without blocking or disabling cookies, you will indicate your consent to our use of these cookies and to our use (in accordance with these Terms) of any Information that we collect using these technologies. **If you do not consent to the use of cookies, please be sure to block or disable them.**

We do not use cookies to store any Personal Data.

We also use local storage. Local storage is an industry-standard technology that allows us to store Information locally on your computer or mobile device. We may use local storage to store Information about your preferences or your authorization details.

5. Use of Google Analytics and Similar Third-Party Services

We use Google Analytics to collect information about use of the Website. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to the Website. We use the information we get from Google Analytics only to improve the Website. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with your Personal Data. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit the Website, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the **Google Analytics Terms of Use** and the **Google Privacy Policy** .

Google Analytics employs cookies to define user sessions, which allows for the collection of data about how visitors are using the Website. Google Analytics uses only first-party cookies for data analysis. This means that the cookies are linked to a specific website domain, and Google Analytics will only use that cookie data for statistical analysis related to your browsing behavior on that specific website. According to Google, the data collected cannot be altered or retrieved by services from other domains.

You can prevent Google Analytics from recognizing you on return visits to the Website by disabling cookies on your browser. To opt out of being tracked by Google Analytics across all websites visit the **Google Analytics Opt-Out page**.

We may use other analytics tools that work in a way similar to Google Analytics.

6. Why We Collect Information

Information is used for:

- Processing payments, providing you an opportunity to participate in Vitalcoin coin sale and providing you the Website and its functionality;
- Setting up, operating and managing your account;
- Identification and verification;
- Monitoring your transactions for the purposes of preventing fraud, money laundering and cheating;
- Analytical and statistical purposes;
- Your seamless interaction with the Website;
- Understanding of your interaction with the Website;
- Website security;
- Improvement and development of the Website or our other services and products;
- Legal and regulatory reasons, including enforcement of this Policy and the Terms;
- Sending you related information, including promotions, special offers, confirmations, newsletters, updates, and security alerts.

Using your name and email address, we will occasionally send you alerts or information on products, bonuses and promotions related to our services. You can opt out from these emails any time.

7. How Long We Retain Information

The time periods for which we retain your Information depend on the purposes for which we use it. We will keep your Information for as long as you are a User and, thereafter, for no longer than is reasonably necessary for reporting and reconciliation purposes pursuant to legal requirements and to provide you with any feedback or information you might request or require.

8. Your Consent

You expressly consent to our processing, collection, transfer, storage, disclosure and other uses of your Information as described in this Policy and the Terms at instance when you:

- Register with us;
- Provide Information to us through the Website;
- Browse and use the Website.

In addition, through this use and interactions with the Website you specifically consent to our (or our suppliers and subcontractors):

- Collection of Information by automated means, such as cookies, local storage or the intended functionality of the Website, and to our subsequent processing and using of Information in accordance with this Policy and Terms;
- Transfer and processing your Personal Data outside of the European Economic Area;
- Storage and transfer of your Personal Data to locations wherever we and our service providers have facilities.

9. Disclosure of Information

We may release Information concerning your use of the Website:

- To provide you with the services and functionality of the Website;
- If it is set out in the Terms;
- When we believe in good faith that such release is appropriate to comply with the applicable law, regulation, legal process or governmental request (for example, pursuant to a statutory demand, subpoena, warrant or court order);
- In order to detect, prevent and investigate fraud or money laundering issues;
- To enforce this Policy and/or the Terms;
- To detect, prevent or otherwise address security or technical issues;
- To protect against abusive or unlawful use of the Website;
- To protect the rights, safety, or property of Users, or any other third parties;
- If we reasonably believe that a situation involving danger of death or injury to any person requires disclosure;
- In other ways described in this Policy and the Terms.

10. With Whom We Share Information

We may share Information we collect only under any of the circumstances mentioned in this Policy and/or the Terms.

We will not share any Personal Data provided by you with third parties except within our associated or subsidiary companies, and with service providers or suppliers under contract who help with our business operations such as payment processing, compliance and User verification, fraud investigation, information management and analytics. Such providers are obligated not to disclose your Personal Data and authorized to use it only as necessary to provide their services to us. We may also make inquiries and disclose your Personal Data to agencies, security organizations and any other relevant third parties for fraud and money laundering prevention.

11. Security of Personal Data

We will take commercially reasonable precautions to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction. We process all Information using industry-standard techniques.

We implement the following administrative, technical, and physical measures for the protection of Personal Data:

- Administrative measures. Access to your Personal Data is limited to authorized personnel who have a legitimate need to access it based on their job descriptions. In case third-party contractors process Personal Data on our behalf, similar requirements are imposed.
- Technical measures. Personal Data is transmitted in encrypted format using SSL technology. We use up-to-date firewall protection and high-quality antivirus and anti-malware software.
- Physical measures. Access to Personal Data is not permitted via the Internet except using an encrypted virtual private network. We store Personal Data on servers provided by third party hosting vendors with whom we have contracted.

However, we do not guarantee or warrant that such techniques will prevent unauthorized access to Information, including Personal Data that we store.

12. Business or Asset Transfer

In the event that we, a line of our business, or our assets are transferred, sold or merged with another business, Information may be one of the transferred assets and we will not be obliged to notify you or need your consent in order to transfer Information.

13. Modifications

We reserve the right, at our sole discretion to put into effect, modify or revise this Policy at any time by posting the Policy or revised Policy on the Website. The Policy or any changes will become effective upon posting of the revised Policy. If we make any material changes to the Policy we will use reasonable efforts to inform you by email or by posting a notice on the Website.

We encourage you to review this Policy each time you visit the Website to make sure you understand the most current Policy. Your continued use of the Website signifies your acceptance of any implemented or changed terms.

14. Changing or Updating Your Personal Data

We take reasonable steps to ensure that the Personal Data we hold about you is accurate, complete and up-to-date. However, we rely on you to advise us of any changes to your Personal Data.

Please log into your account or contact us as soon as possible if there are any changes to your Personal Data or if you believe the Personal Data we hold about you is not accurate, complete or up-to-date so that we can update our records accordingly.

15. Privacy Related Inquiries

If, for any reason, you are concerned with the way that we may be using your Personal Data or you have questions about the privacy aspects of the Website, please, contact us at crm@vitalcoins.io.