

AUCTUS' PRIVACY POLICY

Last updated: May 22, 2019

This Privacy Policy (the "**Policy**") has been compiled to better serve those who are concerned with how AUCTUS PROJECT INC, a company incorporated under the laws of British Virgin Islands ("**Auctus**", "**we**", "**us**", "**our**", the "**Company**"), uses personal information, inter alia, information that can be used to directly or indirectly identify them ("**Personal Data**", "**Personal Information**"), which they might supply to us when they access or visit <https://auctus.fi/> website (the "**Website**"). "You" refers to you, as a user of the Website.

For the reason of the applicable legislation, we inform you that AUCTUS PROJECT INC is the data controller of your Personal Information.

1. YOUR CONSENT

By using this Website, you consent to our collection and use of your Personal Information as described in this Privacy Policy. The Company's Privacy Policy applies to individuals and all other users of the Website to ensure we carry out our services on your behalf and carry out the necessary relevant due diligence to reduce fraud, money laundering and terrorism financing. We reserve the right to change this Privacy Policy, along with related procedures, at any time, without providing any personal notice of the changes to you.

2. COLLECTING AND USE OF PERSONAL INFORMATION

We collect information from you when you register on our Website, subscribe to our service, respond to a survey, fill out a form or enter information on our Website, participate in discussion boards or other social media functions on our Website, enter a competition, promotion or survey, by corresponding with us by phone, e-mail or otherwise, contribute to our Token Sale (as defined in the Terms of AUC Token Sale) and when you report a problem with our Website or provide us with a feedback.

3. PERSONAL INFORMATION THAT IS COLLECTED AUTOMATICALLY

When you use our Website or use our products, we collect the Personal Data sent to Auctus by your PC, mobile phone, or other access device. We collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information (if applicable), information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our Website (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 mouseovers), methods used to browse away from the page and any information of yours related to contact our customer service team (e.g. phone number).
- Information we receive from other sources. This is information we receive about you from public domain, third parties or other websites we operate or the other services we provide. Third parties

we work with include business partners, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies).

4. PERSONAL INFORMATION THAT IS UNIQUE TO YOU

Except for the information which is collected automatically, as described in the clause 3 of this Policy above, the Personal Information is collected only when voluntarily offered by you. The Personal Information means any information that is unique to you, such as:

- *Name;*
- *Date of birth;*
- *Name of entity you represent, if applicable;*
- *Password, if any;*
- *Your ETH wallet address (cryptocurrency address of your public ETH wallet address);*
- *ETH amount you wish to transfer;*
- *E-mail address;*
- *Country and address of residence;*
- *Other personal information you choose to provide.*

By providing us your Personal Information, you also consent for us to collect, hold, use and disclose your Personal Information in accordance with this Privacy Policy. In addition to providing the foregoing information, if you choose to correspond further with us through e-mail or through the “contact” section of our Website, we may retain, use or disclose the content of your messages together with your e-mail address and our responses, unless otherwise agreed between you and the Company in written.

5. KNOW YOUR CUSTOMER PROCESS

In order to participate in the Token Sale, each prospective participant shall be obliged to undergo the identification procedure. In certain cases (when additional verification is required by applicable laws, our anti-money laundering and counter terrorism financing (“AML”) policies) Auctus may require you to provide certain additional information for the due diligence purposes. We may request you to provide the following information for the identification and AML purposes, inter alia:

- *Passport or other official document that can be used to identify you;*
- *Numbers that you may use or have registered with your local tax authority;*
- *Utility bills or other documents confirming your address;*
- *Photographs of you;*
- *Additional contact information (e.g. phone number, skype);*
- *Source of your funds used for purchasing AUC tokens.*

Auctus reserves the right to request basic Personal Data, described in the Article 4, and conduct identification and AML procedures prior to your purchase of AUC tokens and/or use of any services,

available through the Website. Your participation in the AUC token sale shall always be subject to the KYC procedures, if applicable. At that, we shall not bear any liability for such possible incomplete user.

Auctus may refuse your access to the Website or AUC token sale in case (a) you refuse or fail to provide information required for the identification purposes, or data required as a part of the AML procedures, or (b) it has doubts as to the validity, authenticity and genuineness of the Personal Data, provided by you.

Auctus reserves the right to use a third party provider's services for the purposes of conduction of identification and AML procedures as provided herein. If this is the case, You will be redirected to the third party provider's website where you will be able to submit your Personal Information and other data required for the identification and AML purposes; such third party provider shall verify the documents and information provided. Please note that such third party provider may have a privacy policy which, in this case, will regulate the relationship between You and such third party service provider.

6. COOKIES

When you access the Website or use Auctus products or services, we (or Google Analytics or similar service provider on our behalf) may place small data files called "cookies" on your computer or other device. Auctus uses these technologies to recognize you as our Token Sale Participant or user of the Website, customize the Website and advertising, measure promotional effectiveness and collect information about your computer or other access device to mitigate risks, help prevent fraud, and promote trust and safety. You may control the use of cookies within your internet browser's settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of the Website and its services may be impaired.

7. THE PURPOSE OF USING PERSONAL INFORMATION

We may use the Personal Information we collect from you for the following purposes:

- Provision of services to you through the Website or the Auctus Platform;
- Conducting the white listing process (for participants of the AUC token sale);
- Verifying that you are the person who you say you are;
- Conduction of the AUC Token sale, distribution of AUC tokens (which includes the use of your Personal Data in the smart contract and ETH blockchain);
- Communicating with you about Auctus project, token sale, our products and services, news, events and other data which might be interesting to you in our opinion;
- Maintenance, delivery and improvement of the Website, products and services provided through it;
- Detecting, investigating and preventing fraudulent transactions and other illegal activities, and to protect the rights and property of the Auctus and others;
- Analyzing and tracking data to determine the effectiveness of marketing campaign, usefulness of certain content or features, and for better understanding of users' activity;
- Notifying you about changes to the Website, terms of AUC token sale, user documentation, our products or services;
- Protecting our rights and rights of the third parties;

- Verifying compliance with the Terms of Use, governing the use of the Website.

8. HOW WE SECURE INFORMATION TRANSMISSIONS

Auctus protects your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards Auctus uses are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.

Auctus will ensure that the Personal Data will be stored and processed with the reasonable level of care and security. Our corporate values, ethical standards and policies are committed to the protection of customer's Personal Data.

9. THIRD-PARTY DISCLOSURE

Auctus will not sell or rent your Personal Data to third parties. We are sometimes required to compare the Personal Data you provide to third party databases in order to verify its accuracy and confirm your identity. Auctus reserve the right to share your Personal Data with:

- Auctus banking and brokerage partners, legal, marketing, strategic and financial advisors, on a "need to know" basis;
- Company that develops, operates and maintains the Auctus Platform;
- Auctus Personal Data processing counter-parties or agents, hired by or cooperating with us, who's services are required by us from the practical and business point of view;
- Companies that Auctus plan to merge with or be acquired by;
- Third party identification service providers for fraud prevention process, AML, CTF procedures;
- Law enforcement, governments officials or other third parties when Auctus is compelled to do so by any applicable law or a court order, or similar legal procedure; or Auctus believes in good faith that the disclosure of Personal Data is necessary to prevent physical harm or financial lose, to report suspect illegal activity or to investigate violations of any of our policies;
- Third parties, when aggregate information is disclosed, which cannot be reasonably used to identify you;
- Other third parties, only with your prior consent or direction to do so.

Please note that the above allows us to comply with relevant anti-money laundering and counter terrorism financing (AML) regulations.

We use Mailchimp (<https://mailchimp.com>), developed and operated by the Rocket Science Group LLC d/b/a MailChimp, a State of Georgia (USA) limited liability company, to store email addresses and automate mailing campaigns. Your e-mail address may be transferred to Mailchimp. Please note that the e-mail address on its own does not reasonably allow third parties to identify you.

We may also transfer your Personal Data to an entity from our group of companies, which develops, operates and maintains the Auctus Platform. This is reasonably required in order to provide you with

access to the Auctus Platform and allow you to receive certain services through the platform. Some of your Personal Data may be made public by uploading to Ethereum blockchain or smart contract for the purposes of the AUC Token Sale.

You agree that we may, for the purposes set out in article 7 above, permit the transfer of your Personal Data to any jurisdiction, whether or not inside the European Economic Area, and that by accepting these T&Cs you authorize and expressly consent to the processing of your Personal Data by us, our agents and/or our service providers, provided that where your Personal Data is processed by entities other than us, our agents or our service providers, we shall seek your prior written consent in respect of such processing (unless your consent is granted under another provision of this Policy or other agreement entered into between you and the Company).

10. THIRD-PARTY LINKS

Occasionally, at our discretion, we may include or offer third-party products or services on our Website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our Website and welcome any feedback about these sites. Please check these policies before you submit any Personal Data to these websites or use these services. It is also important to note that we allow third-party behavioral tracking. We use Google Analytics and conversion tracking on the Website.

11. SOCIAL SHARING

The Website may allow you to share certain content from the Website on a social media or network. In case you share the content or information through a social media or network, you become involved in relations with the third party that provides the social media or network. Please visit the privacy policies of such third parties to obtain more information about the purpose and scope of data collection and the processing of such data by such entities. We do not bear any responsibility for such third parties.

12. CHANGES TO OUR PRIVACY POLICY

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. The date of last update can be viewed in the "Last Updated" field of this Policy. It is your obligation to periodically visit the Website to review any changes that may be made to this Policy. Your continued usage of the Website shall mean your acceptance of those amendments.

13. RETAINING OF THE INFORMATION

In accordance with applicable AML and CTF laws, and as needed to provide services to the users of the Auctus Platform, we shall retain your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes.

It is required by the law that Auctus retains a certain portion of your Personal Data for at least 5 years after the end of AUC Token Sale. Herewith, we reserve the right to retain all of your Personal Data for the

abovementioned period as we will need to identify you and grant you access to the Auctus Platform, and this may be reasonably needed for commercial purposes of our business and the Auctus Platform.

14. ACCESS TO THE INFORMATION, WITHDRAWAL

You have the right to withdraw your consent for collection, processing and storage of your Personal Data by us at any time, unless we are directed to retain such information by the law. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. If you decide to do this, you should send the respective notification to us by e-mail or through the contact form on the Website.

You have the right to access Personal Information held about you. Your right of access can be exercised in accordance with the applicable laws and this Policy. You have the rights to obtain from us a confirmation as to whether or not your Personal Data are being processed, and, where that is the case, access to the personal data, including, (a) purposes of the processing, (b) the categories of Personal Data concerned, (c) the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organizations, (d) the envisaged period for which the personal data will be stored, or the criteria used to determine that period, (e) the existence of the right to request rectification or erasure of Personal Data or restriction of processing of your Personal Data, (f) the right to lodge a complaint with a supervisory authority, (g) if Personal Data are not collected from you, any available information as to their source, (h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you. Such information shall be provided upon your request within 1 months from its receipt by us.

You may access, review and edit your Personal Data at any time by communicating Auctus in writing. You have the right to demand Auctus to provide you access to your Personal Data and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting Auctus. Nevertheless, this request must comply with Auctus legal obligations. Auctus reserves its right to suspend provision of any services to you referring to Auctus project and AUC token sale, and/or delete your account on the Website without prior notice, not providing any compensation to you.

You may opt out of receiving promotional communications from us at any time by following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as technical notices, support or administrative notifications or information about your account (if you have one).

You may lodge a complaint with a supervisory authority in case you believe that our actions violate your rights as to the Personal Data.

15. THE RIGHT TO DATA PORTABILITY

You have the right to receive the Personal Data concerning you, which you have provided to Auctus, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Auctus. In exercising this right, you shall have the right to have

the Personal Data transmitted directly from us to another controller, in case we reasonably find this technically feasible. Please note that execution of this right must not adversely affect the rights and freedoms of others.

16. THE RIGHT TO BE FORGOTTEN

You have the right to obtain from Auctus the erasure of your Personal Data without undue delay where one of the following grounds applies: (a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, (b) you withdraw your consent for the processing and there is no other legal ground for the processing, (c) you object to the processing where your Personal Data are processed for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing, (d) the Personal Data have been unlawfully processed, (e) the Personal Data have to be erased for compliance with a legal obligation in the law to which you are the subject.

We may reject your request for erasure in case the processing of your Personal Data is necessary (i) for exercising the right of freedom of expression and information, (ii) for compliance with a legal obligation which requires processing by the law to which Auctus is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us, (iii) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the law in so far as the right for erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or (iv) for the establishment, exercise or defense of legal claims.

17. THE RIGHT TO RESTRICTION OF PROCESSING

You have the right to obtain from us restriction of processing where one of the following applies: (a) the accuracy of the Personal Data is contested by you, for a period enabling us to verify the accuracy of the Personal Data, (b) the processing is unlawful and you oppose the erasure of the Personal Data and request the restriction of their use instead, (c) Auctus no longer needs the Personal Data for the purposes of the processing, but is required by you for the establishment, exercise or defense of legal claims, (d) you have objected to processing pending the verification whether the legitimate grounds of Auctus override those of you.

Where processing has been restricted in accordance with the above, such Personal Data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the law. If you obtain restriction of processing pursuant to the above, you shall be informed by Auctus before the restriction of processing is lifted.

18. CONTACT

Questions, comments and request regarding this Privacy Policy are welcomed and should be assessed to contact@auctus.fi or through the Telegram group.

19. CHILDREN'S PRIVACY

Our Website is not intended for the use of children (under 18 years old). We do not knowingly market to, or solicit data from children. We shall not knowingly process, collect or use Personal Data of children, and in case we receive such data, we shall erase it within a reasonable timeframe.