

Privacy Policy

We are **Fantom Foundation Ltd**. Protecting your privacy is important to us. We are the controller of your personal information and this policy explains how we manage personal information within our organisation.

Kinds of personal information we collect

The kinds of personal information that we collect and hold about you may include:

- identifying information, such as your name, nationality and passport details (including photo ID)
- contact information, such as your email address
- social media (including Telegram) handles and other social media profile information that you make available to us or to the public
- financial information, such as wallet address
- usernames and passwords that you create when registering for an account with us
- details of any of our tokens or any other products or services that we provide to you
- information about how you use any of our tokens and any other products and services we provide
- records of our communications with you, including any messages or emails you send us
- device information, server log information, IP address, and location information
- for our employees and other personnel, personnel records that may contain personal information, sensitive information (eg information regarding health, professional memberships) and other personal information captured in our records when you use our systems and devices for personal use
- other information that you provide us during the course of business
- other information that is capable of identifying you

Without this information we may not be able to provide you with our products or services (or with all of the features and functionality offered by our products or services) or to respond to queries or requests that you submit to us.

How we collect personal information

We collect personal information about you in the following ways:

- when you register with us for any token sale, or to whitelist your wallet address with us
- when you order products or services from us
- when you contact us via email or social media (such as Telegram)
- when you submit a query or request to us

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- when you respond to a survey that we run, participate in any sale bounty campaign or fill in forms on one of our websites
- by tracking your use of our products and services (including our website)
- through analytics providers (such as Google which processes personal information subject to its own privacy policy: <https://policies.google.com/privacy/partners>)
- from public sources (including social media platforms which have their own separate privacy policies that govern the access and use of personal information held by those sources)
- from third parties who are entitled to disclose that information to us
- when you apply for a job with us

In some cases we may be required by law to collect certain types of personal information about you.

Where we collect personal information from you, we will generally do so directly ourselves. However, in some cases we may collect personal information from a third party, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

Purposes for which we use personal information

We use personal information that we collect about you for the following purposes:

- to verify your identity when you are dealing with us (including for Know Your Client or “KYC” purposes)
- to determine your eligibility for any of our products or services, or to participate in any token sale
- to enable us to provide our products and services (including providing services on the public Ethereum blockchain)
- to answer your queries and requests
- to comply with our legal and regulatory obligations, or as otherwise required or authorised by law
- to whitelist your wallet address to enable participation in any of our tokens or token sale run by us
- to carry out market analysis and research including through the use of data analytics to improve our products and services
- to monitor use of products and services including use of tokens
- to manage and resolve any legal or commercial complaints or issues
- to carry out planning and forecasting activities and other internal business processes

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- to keep you informed about our activities, including by sending out communications about our tokens, token sales, and the development of the future FANTOM Platform

We may from time to time use your personal information in order to send you marketing materials about products or services that we think you may be interested in (including in some cases products and services that are provided by a third party). You can opt-out of receiving marketing communications from us by contacting us using the contact details below or following the “unsubscribe” link in the communication.

We may also use and disclose your information for other purposes as authorised by you, or in accordance with your requests or instructions.

People to whom we disclose personal information

We may share personal information about you with:

- your representatives, advisers and others you have authorised to interact with us on your behalf
- our staff who need the information to discharge their duties
- our affiliates and related entities within our corporate group including those located outside the country in which you are located
- our business partners, agents and service providers (including our smart contract developer, hosting and cloud providers)
- prospective purchasers of all or part of our business or shares in our company or a related entity
- professional advisers who we engage to provide advice on our business
- government authorities who ask us to disclose that information, or to other people as required by law

Our tokens are ERC-20 compliant tokens which will be distributed via the Ethereum network, a public blockchain, by us in accordance with the applicable Terms of Sale. It is possible to identify personal information from (and including) wallet addresses and other data available on the Ethereum blockchain as it is by nature a transparent and public ledger. Due to the nature of the Ethereum blockchain, we cannot amend or control the disclosure of such personal information.

Disclosure to international recipients

In some cases we disclose your personal information to recipients who may be located outside the country in which you are located (including contractors and third party service providers). We may disclose your personal information to our affiliates and related entities, and employees overseas as necessary to provide you with our goods and services, and arrange your participation in any of our token sales.

We have related entities, affiliates and service providers located in [Australia, Singapore, Hong Kong and the Asia Pacific Region] and may disclose personal information to those entities.

We take commercially reasonable steps to ensure that any overseas recipient has appropriate safeguards in place, ensures an adequate level of protection of your personal

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information, and does not breach the privacy law applicable in your jurisdiction or this Privacy Policy in relation to the personal information.

Cookies

"Cookies" are small text files created and stored on your hard drive by your internet browser software, in order to hold relevant information about the web page you are currently viewing.

We use cookies to monitor and observe your use of our websites, compile aggregate data about that use, and provide you with a more effective service (which may include customising parts of our websites based on your preferences and past activities on those websites). Some third parties (such as providers of data analytics services) may also use cookies over which we have no control.

Most internet browsers have a facility that will allow you to disable all or some cookies altogether – please refer to your browser's help menu to find out how to do this. While you will still be able to browse our websites with cookies disabled on your internet browser, some website functionality may not be available or may not function correctly.

Storage and security of personal information

We take reasonable steps to ensure that any of your personal information which we hold is accurate, complete and up-to-date. These steps include promptly updating personal information when we are advised that the information has changed, checking our contact lists for accuracy, and providing individuals with a simple means to update their personal information.

We store personal information for as long as it is needed for the purpose for which it was collected or as required by law. Within a reasonable time after the expiry of this period, we will take reasonable steps to de-identify or destroy the personal information which is in our possession or control.

We generally store the personal information that we collect in electronic databases, some of which may be held on our behalf by third party data storage providers. Sometimes we also keep hard copy records of this personal information in physical storage facilities. We use a range of physical and technical security processes and procedures to protect the confidentiality and security of the information that we hold, and we update these from time to time to address new and emerging security threats. These measures include:

- restricting access to our physical and electronic databases, and physical security such as security procedures for access to our business premises; and
- technological security procedures including password protection, network firewalls, encryption, intrusion detection and site monitoring where practicable to do so.

Your legal rights regarding your personal information

You have a right to:

- access and request a copy of your personal information to check how we are using your personal information
- correct or rectify any personal information that is out-of-date, incorrect, incomplete or misleading
- withdraw any consent previously given by you to the processing of your personal information

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- object to the processing of your personal information
- ask us to restrict or suspend the use of your personal information

These requests should be submitted to us in writing using the contact details below.

We will action your request within a reasonable time frame and provide one copy of your personal information free of charge. If your request is for additional copies or your request is manifestly unfounded, excessive or repetitive, we may refuse your request or charge a reasonable fee. If we refuse a request or charge a reasonable fee, we will advise you of the reasons for our refusal or any fees within a reasonable time frame.

You have a right to request a copy of the personal information you have provided to us in a structured, commonly used and machine-readable format and the right to have that information transmitted or ported to another entity under certain circumstances.

There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy, rights or freedoms of others, or result in a breach of confidentiality or applicable laws. In these cases we will let you know why we cannot comply with your request.

How to erase your personal information

You have a right to request the erasure or destruction of your personal information (“the right to be forgotten”) when it is no longer necessary for the purpose for which it was originally collected, it is not being used for the purposes for which it was collected, or you wish to withdraw your consent for certain processing. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we have processed your personal information unlawfully, or where we are required to erase your personal information to comply with local law.

There may be cases where we are unable to comply with your request such as where we need to continue processing your personal information in order to comply with applicable laws. Such requests should be submitted in writing using the contact details below.

Complaints

We try to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your personal information or think we may have breached our obligations under the applicable privacy or data protection legislation, or any other relevant obligation, please contact us using the contact details set out below.

Complaints must be lodged in writing. In the complaint, please include your contact details (such as email address, name, address and telephone number) and clearly describe the complaint. We will deal with the matter within a reasonable time and will keep you informed of the progress of our investigation.

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved satisfactorily, you can contact us to discuss your concerns. You are also entitled to make a complaint to the relevant privacy or data protection regulator such as:

- **Australia:** the Office of the Australian Information Commissioner (**OAIC**). Contact details can be found at the OAIC’s website: www.oaic.gov.au
- **United Kingdom:** the Information Commissioner’s Office (ICO). Contact details can be found at the ICO’s website: <https://ico.org.uk/>

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Changes to this policy

We may make changes to this policy from time to time, to take into account changes to our standard practices and procedures or where necessary to comply with new laws and regulations. The latest version of this policy will always be available on our website.

Contact details

If you need to contact us or want any further information from us on privacy matters, please contact us at contact@fantom.foundation

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