

PRIVACY POLICY

We highly appreciate the confidentiality of the holders of IQeon cryptographic tokens and users of software products who support transactions using IQeon tokens (hereinafter referred to as Users) that become available to us when using our website <https://iqeon.io>, and the software products and services supported by IQeon ecosystem (hereinafter referred to as the Service). As in our other documents, the term “Company” means the company IQClash OÜ, which is the sole and full owner of the IQeon platform (hereinafter referred to as the “Company”, “we” and “our”).

We undertake the obligation to maintain the confidentiality of the personal data we collect, ensuring its safety through modern practices, techniques, methods and procedures for software and hardware so that you can always use our Service knowing that your confidential data is protected from unauthorized access. When processing your personal data, we strictly comply with all of the conditions of the legislation of the Republic of Estonia regulating relationship involving the protection of personal data.

1. Compliance with the terms of the Privacy Policy

By using the Service, you (hereinafter referred to as the “User” or “You”) accept the terms of this Privacy Policy. We reserve the right to change the terms of this Privacy Policy. Such changes come into effect immediately after their publication on the website <https://iqeon.io>. Your continuation of the use of the Service means you accept the terms of this Privacy Policy and all of the changes made to this document.

The purpose of this Privacy Policy is to inform you of how we collect, store, use and ensure the security of information relating to you, as well as your rights with respect to such information.

2. What information is collected and for what purposes?

When creating your account in the Service, we may ask you to provide us with some personal information, including your phone number and e-mail address in order to gain access to the Service and subsequent use of the Service.

In accordance with regulatory requirements, in order to gain access and use our Service, you agree and allow us (as well as third parties acting on our behalf): (i) to use the service to determine your geographical location (which may include, among other things, your IP-address, connection to Wi-Fi and cookies data); (ii) to collect, store, process, receive and transmit your personal data (including, among other things, location data), as well as other data and information that may be obtained indirectly from the device from which you access the Service (hereinafter referred to as the “Device”), to provide you with access to the Service, and to comply with the terms of this Privacy Policy. You may not use our Service if you do not wish to give such permission.

We can also use all or part of your personal data to verify your data with the help of third parties within the limits permitted by the legislation of the Republic of Estonia. This is done to give you access to the Service. In addition, when using the Service, we collect certain personal data about your actions, as well as information contained on or derived from the Devices. This is done to improve the quality of the services provided to you through the Service, and to ensure that you do not violate the current IQeon purchase conditions during the Initial sale period. Our partners, as well as our third parties and we who provide services on your behalf, may use your personal data for the following purposes:

- o to confirm financial transactions;
- o to provide you access to the Service;
- o for identification, verification and control;
- o for statistical analysis;
- o for research aimed at the Service development;
- o for marketing purposes, when studying the market and user profiles;
- o for data analysis;

- o to comply with legal requirements;
- o to analyze the risks of non-payments and fraud;
- o to deal with possible security risks;
- o to confirm your geographical location.

We have the right to disclose your personal data in the following cases:

- o at the request of legislation or regulatory body;
- o if we have reasonable grounds to disclose your personal data, such as:
 - to comply with all legal or judicial requirements;
 - to protect our rights;
 - to comply with regulatory bodies requirements;
 - to provide an opportunity to conduct and process payments related to the Service provision to third-party companies that provide services to our company;
 - to enable payment processing for any company that manages payments and provides services to our company;
 - to assist third parties that provide services to us or act on our behalf while advertising and promoting the Service;
 - if the third parties that bought the Company or part of the Company need it;
 - o with your consent;
 - o in order to restore the Service after a failure;
 - o in accordance with the conditions described in sections 5 and 6 of this Privacy Policy.

Policy.

From time to time, we can send you information about our future events and tournaments, news about our products and services, links to offers and other promotional materials about our services (including general customer support information). If at any time you wish to opt out our notifications, you can do this by following the instructions contained in each letter.

Our partners, agents, third parties who provide us with services, and we can process your personal data. At the same time, territorially your personal data can be processed, not only in the jurisdictions of the Republic of Estonia and the European Economic Area, but also beyond their borders. In this case, we comply with all the provisions of the legislation of the Republic of Estonia on the protection of personal data regarding the transfer of your personal data.

Your name will be used in public materials only with your permission.

You shall provide accurate and up-to-date information, including the name under which you register, when filling in the registration form at the time the account is created, as it will be used for checking financial transactions and for the purposes outlined above. You shall notify us of any changes of your personal information provided to us earlier.

Users can modify the account information using the corresponding Software item.

3. Processing of payment transactions

When initiating the purchase of IQeon cryptocurrency tokens, users shall provide the information necessary to successful use of the selected payment method (for example, the number or other credit card information). This information along with other personal data can be used for transaction payments. You shall notify us of any personal data changes. You can also do that by updating your account information.

4. Privacy

The Company makes reasonable efforts to protect the confidentiality of personal data and preferences, as well as other information about individual Users and will not intentionally provide access to such information to any persons not related to the Project Team and the Company, with the exception of the Users themselves or in cases, described in this Privacy Policy. We have made significant investments in the purchase of hardware and software, which are used as a part of the current protection structure, to ensure the protection of the information we receive.

For your part, you should also take appropriate measures to protect your information. Your account information, such as your login and password, is confidential, and you shall keep it in secret and protect it from disclosure and revelation in every possible way.

5. Privacy limits

In accordance with the current legal situation, the regulatory structure, and the state of IQeon infrastructure security, the Company under certain circumstances is obliged to provide personal information about its Users, while we may be prohibited from informing the Users about the disclosure of their personal data, however, we will use all reasonable efforts for restriction of such disclosure that may be required in the following cases:

- a. in cases when we have reasonable grounds to believe that the company is required to provide such information on the basis of a summon, a rule of court or other legal process;
- b. in cases of reasonable necessity with the purpose of determining, establishing a contact or initiating legal proceedings against persons or entities for the protection and/or enforcement of our rights;
- c. in cases when it is required to prevent violation of the Conditions of IQeon tokens purchase.

In addition, we can, and you give us the appropriate authority, to disclose the information we know about you: about the name, age, contact information (including full postal address with postal code and the country of residence, phone number, e-mail address), identity documents, geographical location, as well as information on the financial instruments that you used, to our third-party agents and official state bodies to the extent that we, in our sole discretion, believe necessary or appropriate in connection with the investigation of cases of fraud, violation of intellectual property rights, piracy or other illegal activities or activities that may cause our legal liability.

6. Who gets information about you

Besides disclosing information required by law, we can also disclose your personal information to our employees, our agents and third-party service providers who use your personal data to provide us with services related to the fact that you are a User of the Service. All recipients of your personal data must comply with the current legislation on the protection of personal data and ensure the confidentiality and protection of your personal data to the same extent that we are bound by such obligations.

We may combine your personal data collected during the use of the Service in accordance with this Privacy Policy with other data collected during the use of other services provided by the Company, as well as all products related or supplementing them. We will use the combined data in accordance with this Privacy Policy.

7. Direct marketing

We can use your email address to send you information messages. We respect your right to privacy, so we have provided a simple opportunity to opt out our information messages by e-mail. At any time, you can send a request to stop sending you such messages. To do this, send us an empty letter to this address. After receiving your request to opt out marketing messages, we will remove your information from the mail lists of information materials. Please note that informational messages sent to our subscribers may contain important information and after opting out the messages, the User may not receive valuable information in the shortest possible time.

8. Your rights regarding information about you

You have the right to request information about your personal data that we store (in accordance with applicable law). After the proper verification of the identity of the sender of such a request (verification may be carried out in the form of a request for the provision of identification documents and other information), we will comply with the request within 50 (fifty) calendar days.

In some cases, we may charge a small fee (in accordance with applicable law) to cover administrative costs associated with the execution of the data request. We strive to maintain the maximum reliability of the information about you available at our disposal. You can contact us at any time to review, amend and make the necessary changes or corrections to your data in accordance with your rights under the legislation of the Republic of Estonia on the protection of personal data. In this case, we have the right to ask you to confirm your identity. You can contact us about your personal data by writing to our support team. We draw your attention to case of the deletion of your account (both at your request and by our decision), in this case, your personal data will be kept for the period stipulated by the current anti-money-washing laws.

9. Cookies

Cookies are text lines of information that are downloaded to your Device when using the Service. After that, they are sent back to the website from which they have been received, or to another website, that recognizes these cookies.

Cookies are very useful and multifunctional. They allow you to use the Service more efficiently, remember your settings and generally increase the usability. Sometimes cookies are used to select an advertisement for a particular user that corresponds to his/her interests.

We use cookies to track visitors coming from our partners' websites to remember your settings, to more efficiently respond to your website's actions and to obtain anonymous statistical data that we use to improve the work of the Service. We also use cookies to measure the effectiveness of our advertising campaigns, to determine how many times you have already seen an advertisement, to remember how you use the Service, and to display advertisements that may interest you.

Detailed information about cookies and how we use them when providing the Service can be found in the Cookies Policy.

10. About us

We are registered in accordance with the legislation of the Republic of Estonia. Our information: IQClash OÜ, Reg. No: 14227635, Tartu mnt 83-205, Tallinn, Harju maakond, 10115, Estonia.

Date of entry into force (effective date): October 18, 2017.