

# Privacy Policy

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## 1. INTRODUCTION

1.1 Elitium Ltd takes your privacy seriously. We ask that you read this Privacy Notice carefully as it contains important information about what to expect when we collect personal information about you, and how we, and members of the Elitium Organization, will use your personal data.

1.2 Elitium Ltd is a Gibraltar based company, with address; 57/63 Line Wall Road, Gibraltar Further details for each entity are at paragraph 17.

1.3 This Notice applies to information we collect about:

Visitors to our website

Those who contact us in relation to our services, or as a potential partner or employee or supplier

Those who access gated content on our website and

Those who complete the KYC procedure documents as potential investor / purchaser of Elitium (EUM) Tokens.

Customers who access our Services through the website and platform

## 2. VISITORS TO OUR WEBSITE

When you visit [www.elitium.io](http://www.elitium.io) we use Cookies to collect standard internet log on information and details of visitor behaviour patterns. (e.g. to find out the number of visitors to different parts of the site; the duration of visits; details of the site a visitor may have arrived from; and the network location of our visitors). This enables us to analyse and improve the content of our site and the navigation experience of our users. We do not use this information to attempt to find out the identities of those visiting our website. You can disable or delete the cookies in your browser settings, although this may affect some parts of the site's functionality.

### 3. CONTACTING US THROUGH OUR WEBSITE

When you contact us through our website using the 'Contact Us' page, we collect your name, phone number, business email address, and any message. If you contact us through our instant messaging pop-up, we may collect your IP address, and we will collect any information you provide in the message.

We only use this information to respond to your message, and as further provided in this policy.

### 4. ACCESS TO GATED CONTENT ON OUR WEBSITE

To enable you to better understand our services, we provide access to Client Case Studies and White Paper through our website. To access this content, you will be asked to provide contact details from your organisation and we may contact you after your visit to discuss your organisation's requirements and any questions you may have about our services.

### 5. CLIENTS AND PROSPECTIVE CLIENTS

5.1 If you contact us in relation to our services, we will use the information you provide for the purpose of contracting for, and performing, the requested service; to manage and administer our business; and to fulfil any legal or regulatory requirements. We will retain the information you provide in relation to the provision of the services for six years from the conclusion of the services or termination of the contract.

5.2 If we have previously provided you with services, we may, from time to time, provide you with information on similar services unless you opt-out from receiving these. You can do this at any time by clicking on the link at the bottom of any of our communications.

5.3 In any other case where you provide contact details through our website on behalf of your business, we may, from time to time, provide our newsletter and other information to you (as a representative of your business) in relation to our services. You may opt out from receiving these communications at any time by clicking on the link at the bottom of any of our communications.

### 6. PROSPECTIVE EMPLOYEES

If you contact us in relation to prospective employment we will only use the information you provide for the purpose of progressing your application and to fulfil legal or regulatory requirements. We will not share any of the information you provide during the recruitment process with any third parties for marketing

purposes. We will use the contact details you provide to progress your application and the other information you provide to assess your suitability for employment with us. If we make a conditional offer of employment we may ask you for further information to carry out any required pre-employment checks. If we employ you, we will retain the information you have provided during the application process as part of your employee file for the duration of your employment plus six years after the end of your employment. If we do not employ you, the information you have provided in your application, or at a later stage of the recruitment process, will be retained for six months.

#### 7. PROSPECTIVE SUPPLIERS

If you contact us in relation to your services, we will use the information you provide for the purpose of considering and, if relevant, contracting for your services; to manage and administer our business; and to fulfil any legal or regulatory requirements.

#### 8. ACCESS TO CUSTOMER SUPPORT SERVICES

If you are a staff member of an Elitium Member or Customer, you may access Customer Support in relation to our services through an off-line and secured server environment. We collect identification and authentication information to enable you to use this service. We will only use such information for the purpose of providing the support service and to fulfil any legal or regulatory requirements.

#### 9. INFORMATION COLLECTED FROM THIRD PARTIES

Occasionally we may receive and use information about you from other sources (such as credit reference agencies, referees, professional advisors or other similar bodies) which we will add to the information which we already hold about you in order to help us provide the required services or comply with our legal and regulatory obligations, in particular regarding anti-money laundering, bribery or criminal finances legislation.

#### 10. HOW WE USE AND SHARE YOUR INFORMATION WITHIN THE ELITIUM GROUP

If you apply for a position, request a service, contract with us as a partner, supplier, or otherwise contact us, your personal information will be used and shared within the Elitium organization in accordance with your requirements and our operational arrangements.

## 11. HOW WE USE AND SHARE YOUR INFORMATION WITH OTHER PARTIES.

We may share your information with third parties if this is required by law or our insurance requirements. We may also share information with third parties who provide data processing services for Elitium, but only where such third parties are subject to a contract that prevents them using the data other than as instructed by us, restricts the sharing of the data, and requires them to hold the data securely and for the period we instruct. If we use third party data processors outside the European Economic Area (EEA) we only do so where they have safeguards in place that meet the requirements of European data protection laws.

## 12. TRANSFERS OF PERSONAL DATA OUT OF THE EUROPEAN ECONOMIC AREA (EEA)

We will only transfer your personal data to data controllers outside of the EEA where this is specifically authorised by data protection law, such as for the exercise of legal claims or for important reason of public interest.

## 13. HOW WE PROTECT YOUR INFORMATION

13.1 We have put in place various security procedures and technical and organisational measures to safeguard your personal information. Our security and privacy policies are regularly reviewed. All your information provided through the KYC procedures and by completing the required documents and forms etc. will be kept in an "of line" environment, solely controlled by Elitium Ltd and stored in so called "stand alone" servers.

13.2 Elitium shall not process data, obtained out of the KYC procedures to third parties, unless the Company has a legal ground to do so, for example consent is given or if it is required by law. Additionally, employees at Elitium are trained to ensure they handle all personal data with care and strict confidentiality. For staff, personnel access rights have been specified to serve the applicable legitimate purposes required for the individual to perform his or her duties.

## 14. YOUR RIGHTS

14.1 You have the right to request details of the information that we hold about you. If you would like a copy of some or all of your personal information, please send an email or letter using the contact details provided below. We are entitled to charge a fee for this service if requests are manifestly unfounded, repetitive or excessive.

14.2 We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to us changes, for example if you change your email address or name, please let us know the correct details by contacting us at the details below. You may ask us, or we may ask you, to correct information you or we think is inaccurate.

14.3 You may have other rights in relation to the personal data we hold about you, including, in some circumstances, a right to restrict or object to processing, to seek erasure of your data or transfer your data to another provider. Full details of these rights, and the conditions in which they are available, can be viewed at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>. You have a right to complain to the Information Commissioner's Office if you do not believe we are respecting your rights.

## 15. CHANGES TO OUR PRIVACY POLICY

We keep our Privacy Notice under regular review. If we change our Privacy Notice we will post the changes on this page, and place notices on other pages on the website, so that you may be aware of change. This Privacy Notice was last updated on October, 2018.

## 16. LINKS TO OTHER WEBSITES

Our website may contain links to other websites. This Privacy Notice applies only to our website so when you access links to other websites you should read their own privacy notices.

## 17. DETAILS FOR THE ELITIUM GROUP

How to contact us:

Elitium Ltd, Chief Technical Officer, 57/63 Line Wall Road, Gibraltar.

Email: [privacy@elitium.io](mailto:privacy@elitium.io)