

# Personal Data Protection Policy

## Personal Data Protection is important to us

Protection of your Personal Data is important to us. This Personal Data Protection Policy (“**Policy**”) outlines how we manage the Personal Data we hold. The Policy applies when using Locus Chain Foundation’s website (<https://locuschain.com>).

We respect the confidentiality of Personal Data and privacy of individuals and are committed to complying with the Singapore Personal Data Protection Act (Act 26 of 2012) (“**PDPA**”) and other applicable data protection laws, including the European Union (“**EU**”) General Data Protection Regulation (“**GDPR**”) where applicable. Please read this Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

This Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which any member of the Locus Chain Group may have at law to collect, use or disclose your Personal Data. This Policy does not affect any rights which we may have at law in connection with the collection, use or disclosure of your Personal Data.

For the avoidance of doubt, to the maximum extent permitted under applicable law, nothing in this Policy establishes any joint and several liabilities on the part of the Locus Chain Group members.

## Personal Data

- A. “**Personal Data**” refers to any data or information about you from which you can be identified either (a) from that data alone; or (b) from that data combined with other information. Examples of such Personal Data which you may provide us include (depending on the nature of your interaction with us):
- i. email address and any other information relating to you which you have provided us in any form you may have submitted to us, or in other forms of interaction with you;
  - ii. information about your use of our websites and services, including cookies and IP addresses;
  - iii. your digital token wallet addresses (if you have our Privileged Card).

## **Collection of Personal Data**

Generally, we collect your Personal Data in the following ways:

- a) when you subscribe to our emailing list;
- b) when you sign up through our Privileged Card.

## **Use and Disclosure of Personal Data**

You consent to our use and disclose your Personal Data for the following purposes:

- a) provide you with the products or services that have been requested;
- b) communicate with you and respond to your queries, requests and complaints;
- c) provide ongoing information about our products and services which may be of interest to you;
- d) handle disputes and conduct and facilitate investigations and proceedings;
- h) manage our infrastructure and facilitate business operations and comply with internal policies and procedures; and
- j) comply with any applicable rules, laws and regulations.

## **Transfer of Personal Data**

Your Personal Data may be stored in external servers located overseas. In addition, as described above, in carrying out our business, it may be necessary to share information about you with and between our related corporations and third party service providers, some of which may be located in countries outside your country of residence. Such countries may not afford a standard of protection similar to those in your country of residence. However, we will take reasonable steps to ensure that your Personal Data transmitted outside of your country of residence is adequately protected. In addition, we will ensure that such transfers comply with the requirements of the applicable data protection laws.

## **Retention of Personal Data**

We may retain your personal data for 7 years or at longest, 10 years. Where we no longer require your Personal Data for those purposes, we will cease to retain such Personal Data in accordance with our internal retention policy.

## **Management and Security**

We have appointed Data Protection Officers to oversee our management of your Personal Data in accordance with this Policy and the applicable data protections law. We train our employees who handle your Personal Data to respect the confidentiality of your Personal Data, and we regard breaches of all applicable data protection laws very seriously.

## **Cookie Policy**

"We use "cookies" to collect information about you and your activity across our Website. A cookie is a small piece of data that our Website stores on your computer, and accesses each time you visit so we can understand how you use our Website and serve you content based on preferences you have specified. If you do not wish to accept cookies from us, you should instruct your browser to refuse cookies from our Website, with the understanding that we may be unable to provide you with some of your desired services without them. This policy covers only the use of cookies between your computer and our Website; it does not cover the use of cookies by any advertisers.

## **Third-Party Sites**

Our website may contain links to other websites operated by third parties, such as our business partners. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website, unless that is a mandatory requirement by applicable data protection laws and regulations. We encourage you to learn about the privacy policies of such third parties. Once you have left our website, you should check the applicable privacy policy of such third parties at their respective websites to determine how they will handle any information they collect from you.

## **Review of this Policy**

This Policy will be reviewed from time to time by us. We may also from time to time update this Policy to take account of new laws and technology, changes to our operations and practices and the changing business environment. If you are unsure whether you are reading the most current version, please contact us.

In the event of any inconsistencies between the English version and other translations of this Policy, the English version shall prevail.

## CONTACT

If you have any questions or problems regarding your use of this policy, site, or service, please contact the Data Protection Officers via Email below:

- E-mail : [info@locuschain.com](mailto:info@locuschain.com)

- Date of Privacy Policy Notice: 2018.08.20
- Date of Privacy Policy Enforcement: 2018.08.20
- Privacy Policy Version Information: V.1.7