

Elementh Privacy Policy

STATUS AND ACCEPTANCE OF PRIVACY POLICY

1. This Privacy Policy (hereinafter referred to as the “Policy”) sets forth the general rules of Purchaser’s Personal Data collection, processing, distribution, use and keeping by the Elementh Development Pte. Ltd. that is a company incorporated in Singapore, registered at 176 JOO CHIAT ROAD, #02-02, SINGAPORE (427447) (hereinafter the “Elementh”).
2. Throughout this Policy, Elementh use the term “Personal Data” to describe information that can be associated with a specific person (hereinafter the Purchaser) and can be used to identify that person (including the information about the Purchaser’s activities, such as information about Your use of the Website (<https://elementh.io/>), when directly linked to personally identifiable information, including automatically collected). Elementh does not consider Personal Data to include information that has been anonymized so that it does not identify a specific Purchaser.
3. This Policy is inalienable part of EEE Tokens Sale Agreement. In terms not regulated by this Policy, the EEE Tokens Sale Agreement shall apply to the relationships that arise hereunder.
4. The definitions set forth herein and mentioned with capital letter shall have the meaning as described in EEE Tokens Sale Agreement.
5. It is understood and presumed that by the fact of the Website use and purchase of EEE Tokens or by providing Elementh the Personal Data directly on its request, the Purchaser has fully read, understood and accepted this Policy. If any Purchaser does not agree with this Policy in general or any part of it, such Purchaser should withhold from using the Website and/or purchase of EEE Tokens.

COLLECTION, PROCESSING AND USE OF PERSONAL DATA

6. The purpose of personal data collection, storage and processing within the Elementh project shall only be the identification of the Purchaser of the EEE Tokens Sale.

7. Elementh collect Personal Data from running the Website and use Personal Data, provided to Elementh by You. When the Purchaser visit the Website or use our products, Elementh collect the Personal Data sent to Elementh by Your computer, mobile phone, or other access device. This Personal Data includes:

- (1) Your IP address;
- (2) Device information including, but not limited to, identifier, name, and type, operating system;
- (3) Mobile network information;
- (4) Standard web log information, such as Your browser type, and the pages You accessed on Elementh Website.

When the Purchaser use a location-enabled device with Elementh Website and products, Elementh may collect geographical location data or use various means to determine the location, such as sensor data from the Purchaser's device that may, for instance, provide data on nearby cell towers and Wi-Fi access spots. However, Elementh will not release Your personally identifying information of such kind to any third party without Your consent, except as set forth herein.

8. If the Purchaser want to purchase EEE Tokens, Elementh collect and store the following types of Personal Data about You:

- (1) Your name, Date of birth;
- (2) Your address, country of residence;
- (3) Your email and contact phone.

9. In certain cases (when additional verification by bank or compliance authority is needed according to governmental rules, anti-money laundering (AML) or "know-your-customer" (KYC) policies) Elementh may require You to provide additional information. Such information provided by you at Elementh's request in accordance with Elementh AML/KYC Policy, available at the Website.

10. Elementh reserve the right to request basic Personal Data, described in clause 9 and Elementh AML/KYC Policy, prior to purchase of EEE Tokens and/or use of any services,

available through the Website. Elementh may refuse the Purchaser access to the Website in case if Elementh have grounded doubts as to validity, authenticity and genuineness of the Personal Data, provided by the Purchaser.

11. If the Purchaser does not provide Elementh with the Personal Data as specified in clauses 8, 9 hereof and in Elementh AML/KYC Policy, the Purchaser shall not be able to use the full functionality of the Website and purchase EEE Tokens and/or use the Elementh platform. At that, Elementh shall not bear any liability for such possible incomplete use.

12. When the Purchaser access the Website or use Elementh products or services Elementh (or Google Analytics or similar service provider on our behalf) may place small data files called cookies on the Purchaser's computer or other device. Elementh use these technologies to recognize You as our Token Sale Purchaser, customize Elementh Website and advertising, measure promotional effectiveness and collect information about Your computer (as described in clause 7. hereof) or other access device to mitigate risk, help prevent fraud, and promote trust and safety. You may control the use of cookies within Your internet browsers' settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of our Website and services may be impaired.

13. Elementh collect from the Purchasers only the Personal Data that Elementh need for their proper use of the Website or for purchase of EEE Tokens. In particular, Elementh use the Purchaser's Personal Data to:

- (1) Administer Elementh Website and provide services;
- (2) Develop new products and services;
- (3) Personalize Elementh Website for You;
- (4) Send You technical notices and support and administrative messages;
- (5) Communicate with You about products, services, promotions, events and other news and information Elementh think will be of interest to You;
- (6) Monitor and analyze trends, usage and activities in connection with Elementh Website;

- (7) Provide third parties with statistical information about Elementh Purchasers (but those third parties will not be able to identify any individual Purchaser from that information);
- (8) Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Elementh and others;
- (9) Link or combine Personal Data Elementh collect from or about You; and
- (10) Verify compliance with the terms and conditions governing the use of Elementh Website (including monitoring private messages sent through the Website private messaging service).

14. The Elementh is the only data controller and processor, except for the cases when there is an objective Elementh need to control/process or store Personal Data at Elementh's counterparties or agents. Should such counterparty or agent be engaged by the Elementh, Elementh shall notify You in advance.

15. You may access, review and edit Your Personal Data at any time by communicating Elementh in writing.

16. The Purchaser has the right to require Elementh to delete Purchaser's Personal Data provided by the Purchaser to Elementh or revoke his (or her) consent for collection, processing and storage of his (or her) personal data by Elementh at any time. If You decide to do this, You should send the respective notification to the Elementh. Elementh shall delete Your respective Personal Data from any sources within 24 hours from the moment Elementh receive such request from You. At that, the Elementh reserves its right to suspend provision of any services to You referring to Elementh project and/or delete Your Account on the Website without prior notice, not providing any compensations to You.

17. Elementh will not publish any Personal Data related to Your purchase of EEE Tokens without Your prior written consent.

PERSONAL DATA PROTECTION AND SHARING

18. Elementh will do any and all efforts and actions prescribed by Applicable Law to store any of Your personal data in secrecy.

19. Elementh store and process Your Personal Data on Elementh servers in various jurisdictions, where our facilities and/or Elementh service providers are located. By submitting Your Personal Data, You agree to this transfer, storing, or processing. Elementh will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Policy. Elementh protect 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 Elementh use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. Elementh also authorize access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent than in Your country. From time to time, the Personal Data may be also stored in other locations, and in such cases, Elementh will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

20. Elementh is sometimes required to compare the Personal Data You provide to third party databases in order to verify its accuracy and confirm Your identity. This allows Elementh to comply with relevant anti-money laundering (AML) regulations and “know your customer” (KYC) regulations.

21. Elementh will not share Your Personal Data with any third parties other than Elementh respective identity verification partners. Elementh reserve our right to share Your Personal Data with:

- (1) Elementh banking and brokerage partners;

- (2) Companies that Elementh plan to merge with or be acquired by (should such a combination occur, Elementh will notify You and will require that the newly combined entity follow these terms with respect to Your Personal Data);
- (3) 3rd party identification service providers for fraud prevention purposes;
- (4) Law enforcement, government officials, or other third parties when Elementh are compelled to do so by a subpoena, court order, or similar legal procedure; or Elementh believe in good faith that the disclosure of Personal Data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of Elementh policies;
- (5) Elementh Personal Data processing counterparties or agents, hired by or cooperating with us, who's services are required by us from the practical point of view;
- (6) Other third parties only with Your prior consent or direction to do so.

22. Elementh will not provide Your Personal Data to any other Website users or third parties other than described in clause 21 herein without Your consent or direction.

23. Elementh will not sell or rent Your Personal Data to third parties.

24. Elementh may combine Your Personal Data with information Elementh collect from other companies and use it to improve and personalize the Website and our products, as well as our content and advertising.

25. Elementh may use Your name and email address to provide You with information about products or services that may be of interest to You, but Elementh will not use Your Personal Data without complying with applicable laws and, where appropriate, obtaining your consent.

26. Elementh services may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If You follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that Elementh do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location data. Please check these policies before You submit any personal data to these websites or use these services.

RETAIN INFORMATION

27. In accordance with Applicable Law and as needed to provide services to Elementh Purchasers, Elementh may hold Your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. Elementh may retain Your Personal Data for as long as You possess EEE Tokens and/or use the Website. Moreover, Your Personal Data may be hold beyond the abovementioned period till it is indispensable for Elementh to have relevant information to respond to any issues that may arise later.

SECURITY

28. Elementh use relevant electronic and procedural safeguards to protect the privacy of the information the Purchaser provide to Elementh from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Please note that Elementh are not liable for the security of any data Purchasers are transmitting over the Internet, or third party content.

CHANGE/UPDATE/DELETE PERSONAL DATA

29. You have a right to demand Elementh to provide You access to Your Personal Data and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting Elementh. Nevertheless, this request must comply with EEE Tokens Sale Agreement and Elementh legal obligations.

AMENDMENTS

30. Elementh reserves the right to modify or amend this Policy at its own discretion. The changes can be viewed in the “Last Updated” field above. Your continued usage of the Website shall mean Your acceptance of those amendments.