

PRIVACY POLICY

By accessing or using <http://www.arciris.info/> (the “**Website**”), a website developed and owned by ATB Invest Ltd UK, No. 12122818 (“**we**” “**us**” or “**our**”), you consent to the information collection, disclosure and use practices described in this Privacy Policy. This Privacy Policy applies to all Services provided by us and sets out how we may collect, use and disclose information in relation to users of the Website.

The Website is a new generation cryptocurrency based on Script having complete Proof of Stake (POS) network, which offers range of solutions including but not limited to Wallet, Mobile Payment, Exchange, and E-Commerce Platform (the “**Service**”).

Use of Website, including all materials presented herein and all Services provided by us, is subject to separate Terms and Conditions, Token Sales Agreement, and this Privacy Policy. This Privacy Policy applies to all site visitors, customers, and all other users of the Website. By using the Website or Services, you agree to this Privacy Policy, without modification, and acknowledge reading it.

1. Information We Collect

1.1 Your privacy is important to us and we have taken steps to ensure that we do not collect more information from you than is necessary for us to provide you with our services and to protect your account.

1.2 We may process the following categories of personal data about you:

1.2.1 **Communication Data** that includes any communication that you send to us whether that be through the contact form on our Website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

1.2.2 **Customer Data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We use your email to communicate with you about your order and to manage our customer relationship with you. When you contact us through any of the communication modes as mentioned hereinabove, your email address may be added to our mailing list from which you can unsubscribe at any time using the unsubscribe link in each email or by contacting us at support@arciris.info

1.2.3 **User Data** that includes data about how you use our Website and Services together with any data that you post for publication on our Website or through other Services. We process this data to operate our Website and ensure relevant content is provided to you, to ensure the security of our Website, to maintain back-ups of our Website and/or databases and to enable publication and administration of our Website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our Website and our business.

1.2.4 **Technical Data** that includes data about your use of our Website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our Website, page views and navigation paths, details about the number of times you use our Website, time zone settings and other technology on the devices you use to access our Website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our Website and other online services, to administer and protect our business and Website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our Website and our business and to grow our business and to decide our marketing strategy.

1.2.5 **Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

1.3 We may use Customer Data, User Data, Technical Data and Marketing Data (the “**Data**”) to deliver relevant Website content and advertisements to you and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you.

2. **Consent and its withdrawal**

2.1 When you provide us with the Data, we imply that you consent to our collecting it and using it for that specific reason only. In order to provide you with the Services, it is necessary for us to collect all relevant and necessary Data about you from you.

- 2.2 If you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at support@arciris.info

3. How We Use and Process the Data

- 3.1 We use the Data to prepare your unique file with your medical/psychological history and to provide you with our Services in the best possible way.
- 3.2 The Data collected by us from you may be used to provide you with services and better understand your needs related services and programs, to correspond with you and reply to your questions with about our services.
- 3.3 We will not rent or sell your Data to others. We may store the Data in locations outside the direct control of the Company (for instance, on servers or databases co-located with hosting providers).
- 3.4 If you provide any Data to us, you are deemed to have authorized us to collect, retain and use that data for the following purposes:
- i. verifying your identity;
 - ii. prepare your medical history file;
 - iii. providing you with customer service and responding to your queries, feedback, or disputes;
 - iv. making such disclosures as may be required for any of the above purposes or as required by law, regulations and guidelines or in respect of any investigations, claims or potential claims brought on or against us;
 - v. provide and maintain the Services;
 - vi. notify you about changes to our Services;
- 3.5 We shall ensure that:
- i. The Data collected and processed for and on our behalf by any party is collected and processed fairly and lawfully;
 - ii. You are always made fully aware of the reasons for the collection of Data and are given details of the purpose(s) for which the data will be used;
 - iii. The Data is only collected to the extent that is necessary to fulfil the purpose(s) for which it is required;
 - iv. All Data is accurate at the time of collection and kept accurate and up to date while it is being held and/or processed;
 - v. No Data is held for any longer than necessary in light of the purpose(s) for which it is required.

- vi. Whenever cookies or similar technologies are used online by us, they shall be used strictly in accordance with the law;
- vii. You are provided with a simple, accessible method of amending any Data submitted by you online;
- viii. You are informed if any data submitted by you online cannot be fully deleted at your request under normal circumstances and how to request that we delete any other copies of that data, where it is within your right to do so;
- ix. All Data is held in a safe and secure manner taking all appropriate technical and organisational measures to protect the data;
- x. All data is transferred securely, whether it is transmitted electronically or in hard copy.
- xi. You can fully exercise your rights with ease and without hindrance.

4. Disclosure of Data

4.1 We shall not be able to keep your Data private in response to legal process i.e., a court order or a subpoena, a law enforcement agency's request. If, in our view, it is deemed appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law, we may be compelled to disclose the Data. Moreover, in case of takeover, merger or acquisition, we reserve a right to transfer your data to new platform.

4.2 We may disclose the Data in the good faith belief that such action is necessary to:

- xii. comply with a legal obligation
- xiii. protect and defend our rights or property
- xiv. prevent or investigate possible wrongdoing
- xv. protect the personal safety of users of the Service or the public
- xvi. protect against legal liability

4.3 When necessary, we may also disclose and transfer your Data to our professional advisers, law enforcement agencies, insurers, government and regulatory and other organizations.

5. Data Storage

5.1 Your data may be stored and processed at the servers in the United States, Europe, or any other country in which the Website or its subsidiaries, affiliates or service providers maintain facilities.

- 5.2 The Website may transfer Data to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.
- 5.3 We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.
- 5.4 We will only retain your Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, see section regarding insurance requirement and reporting requirements. When deciding what the correct time is to keep the Data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

6. How We Protect Your Information

- 6.1 We store all the Data submitted by you through Website at a secure database. All reasonable measures shall be made to secure all the Data submitted by you in the physical form.
- 6.2 We are concerned with protecting your privacy and data, but we cannot ensure or warrant the security of any data you transmit to or guarantee that your Data may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical or managerial safeguards.
- 6.3 No method of transmission over the Internet or method of electronic Therefore, we cannot guarantee its absolute security. If you have any questions about security on our App, you can contact us at info@arciris.com.
- 6.4 Any Data supplied by you will be retained by us and will be accessible by our employees, any service providers engaged by us and third parties.

7. The rights of Users

- 7.1 You may exercise certain rights regarding your Data processed by us. In particular, you have the right to do the following:
 - 7.1.1 **Withdraw consent at any time.** You have the right to withdraw consent where you have previously given your consent to the processing of your Data.

- 7.1.2 **Object to processing of Data.** You have the right to object to the processing of your Data if the processing is carried out on a legal basis other than consent.
- 7.1.3 **Access to the Data.** You have the right to learn if Data is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- 7.1.4 **Verify and seek rectification.** You have the right to verify the accuracy of your Data and ask for it to be updated or corrected.
- 7.1.5 **Restrict the processing of your Data.** You have the right, under certain circumstances, to restrict the processing of Data. In this case, we will not process your Data for any purpose other than storing it.
- 7.1.6 **Have the Data deleted or otherwise removed.** You have the right, under certain circumstances, to obtain the erasure of the Data from us.
- 7.2 You may initiate request with us at support@arciris.info to exercise any of the above mentioned rights. We shall review your request and, in our own discretion, honor your request, if deemed necessary by us, within reasonable time.

8. Compliance with Data Protection Rights under General Data Protection Regulation (GDPR)

We are a Data Controller of your personal information for privacy policy.

For European Economic Area (EEA), our legal basis for collecting and using your personal information, as described in this Privacy Policy, depends on the information we collect and the specific context in which we collect it. We may process your personal information because:

- We need to perform a contract with you, such as when you create a Policy with us
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. In certain circumstances, you have the following data protection rights:

- The right to data portability
- The right to withdraw consent
- The right to access the personal information.
- The right to update or to delete the personal information we have on you
- The right of rectification
- The right to object

- The right of restriction

We may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your personal information. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Service Providers

We can employ third party companies and individuals to facilitate our website ("Service Providers"), to provide our website on our behalf, to perform website-related services or to assist us in analyzing how our website is used. These third-parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

- **Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google's Privacy & Terms.

- **Payments processors**

We provide paid services on our website. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy.

9. Cookies

9.1 This Website uses cookies to better the users experience while visiting the Website. Where applicable this Website uses a cookie control system allowing the user on their first visit to the Website to allow or disallow the use of cookies on their computer / device.

- 9.2 Cookies are small files saved to the user's computers' or mobile devices' hard drive or memory that track, save and store information about the user's interactions and usage of the Website. This allows the Website, through its server to provide the users with a tailored experience within this Website.
- 9.3 Users are advised that if they wish to deny the use and saving of cookies from this Website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this Website and its external serving vendors.
- 9.4 We may gather certain information automatically and store it in log files. This information includes Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and click stream data. We may use this information, which does not identify individual users, to analyze trends, to administer the Website, to track users movements around the Website and to gather demographic information about our user base as a whole.
- 9.5 We may track the referring URL (the web page you left before coming to the Website) and the pages, links, and graphics of the Website you visited. We do so because it allows us to evaluate the reputation and responsiveness of specific web pages and any promotional programs we may be running.

10. Third Party Links

- 10.1 The Website may contain links to third-party websites, plug-ins and applications. Except as otherwise discussed in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you on our Website. Other websites accessible through our site via links or otherwise have their own policies in regard to privacy. We are not responsible for the privacy policies or practices of third parties. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

11. Changes to this Privacy Statement

- 11.1 We may modify these this Privacy Policy from time to time, and any such change shall be reflected on the Website with the updated version of the Privacy Policy and you agree to be bound to any changes to the updated version of Privacy Policy when you use the Website or its services.
- 11.2 You acknowledge and agree that it is your responsibility to review this Website and this Policy periodically and to be aware of any modifications. Updates to this Policy will be posted on this page.
- 11.3 Also, occasionally there may be information on the Website that contains typographical errors, inaccuracies or omissions that may relate to service descriptions, pricing,

availability, and various other information, and the Website reserves the right to correct any errors, inaccuracies or omissions and to change or update the information at any time, without prior notice.

12. Contact US

12.1 If you have questions about our Privacy Policy, please contact us via email: support@arciris.info.