

# DISCLAIMER

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This White Paper does not in any way refer to activities that take place under Securities Exchange, therefore, the issuance of the ENVOY Tokens will not amount to issuance of securities in whatsoever nature. ENVOY Tokens are similar to assets, hence, do not fit any definition of a currency of any nature, both virtual and fiat currency.

When purchasing the ENVOY Token you shall be guided by a different Terms of Use that will be provided for under the domain name hosting the ENVOY ICO. The Terms of Use shall include other policies, like Terms of Use, and Privacy Policy.

By virtue of utilising our platform, with or without reading this Disclaimer, with or without understanding this White Paper or platform content, with or without seeking whatsoever professional advise, you agree that you are aware of what you are engaging in and we shall not be liable to you or your assigns, agents, employee, employer, and or anybody else for whatever tortious, civil, and or criminal liability that may arise whether directly or indirectly.

## Privacy policy

When you visit our website (webpage crowdcoinage.com and its subpages, “**Site**”) or we have any communication or interaction with you, your personal data is collected and processed by Envoy (an Estonian private limited company, registry address Pärda 4 411-1, Tallinn, 10151, Estonia “**Envoy**” or “**we**”). This Privacy Policy explains how we process your personal data.

We collect only what we need and will not share your personal data with any third parties other than our identity verification partner. We process all data within the European Union and comply with applicable European Union and national laws on personal data protection and privacy. If you do not agree with our practices, please do not use our Site and the services offered therein (“**Services**”).

Types of Information We Process:

Personal Data: We collect personal data you provide to us when you sign up to our pre-sale mailing list and/or create an account. The personal data we process may consist of: your full name, username, email address, your address, country of residence, age, any other information on your identity document, credit card and bank information (without

the CVV code), details of any requests or transactions you make through the Services, and communications you send to us or submit to the Site (“**Personal Data**”);  
Aggregate and Anonymous Data: Aggregate and anonymous data is information that does not identify you specifically, including data collected automatically when you enter our Site (“**Non-Personal Data**”). This may include cookies, pixel tags, web beacons, browser analysis tools and web server logs. This also includes information from the devices you use to access our Site or mobile platform, your operating system type or mobile device model, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone of your device. Our server logs may also record the IP addresses of the devices you use to interact with the Site. We may also collect information about a website you were visiting before you came to our Site and any website you visit after you leave our Site, if this information is supplied to us by your browser. We may also use software tools, such as Javascript, to measure and collect session information, including page response times, download errors, and methods used to browse away from the page. Non-Personal Data also includes some data collected by location services.

### The Purpose and Period of Processing Personal Data and Non-Personal Data

Based on our legitimate interests to pursue our business activities and our rights and obligations deriving from potential contracts concluded with you, your Personal Data will be used for the following purposes:

- to register your interest in participating in the Token Sale;
- to process and complete any order you might place for Envoy tokens, including to conduct Compliance Checks;
- to collect and manage the proceeds of the Token Sale;
- to contact you and send you promotional and marketing information by telephone call, SMS, fax, post and email regarding (a) the Token Sale and any future sale of Envoy tokens and/or (b) the Envoy platform, Envoy tokens or other Envoy events, products and services; - 4 –
- to notify you about updates or changes to this Privacy Policy or the Terms, or any aspect of the Token Sale Activities (including to inform you about any terms and conditions applicable to the Token Sale);
- to respond to your communications to us; • to detect, diagnose and fix problems affecting the Token Sale Site; • to personalise your experience on the Token Sale Site;
- for internal business purposes, including research, analysis, testing and auditing;
- to comply with applicable legal obligations and other rules, regulations, codes of practice and orders and directions of competent governmental authorities that we are obligated to follow;
- to prevent, detect, investigate and prosecute threats, fraud, misconduct or other unlawful or malicious activity; • to enforce our agreements and resolve disputes; and • to protect our rights and property and the rights, property and safety of others.

Any Non-Personal Data that we may gather that will not relate to you as an individual data subject (e.g. the times you view or use our Services) may be used for analytical and/or statistical purposes.

## Limited Disclosure of Personal Data and Non-Personal Data

Except as provided herein, we will not display on the Site, or otherwise disclose your Personal Data to any third parties unless it is necessary to provide the Services offered on the Site, when required by law, or if we have good faith belief that such action is reasonably necessary to

- comply with current judicial proceedings, a court order or legal process served on us;
- protect and defend our rights, property and interests, including by enforcing our agreements, policies or other such documents;
- respond to claims that any submitted content violates the rights of third parties;
- respond to your requests for customer service;
- protect the rights, property or personal safety of Envoy, its members and the public;
- in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company, or with your consent to share the information.

We may share Non-Personal Data with analytics companies to learn information about how our users interact with the Site. This enables us to optimize the Services and improve our efforts.

We will never sell your Personal Data or Non-Personal Data.

## Retention, Rectification and Deletion of the Data

We will retain your information only for as long as needed to provide you the Services or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

You can modify and rectify the Personal Data you have provided to us by logging in and updating your profile. If you wish to delete the Personal Data collected by us or submit any other request concerning your personal data (e.g. requests regarding data portability, restrictions or objecting to the processing), you can do so by submitting a written request to our customer support via [support@envoytoken.io](mailto:support@envoytoken.io). You should keep in mind that the request to delete Personal Data is possible only if your account is deleted. If we delete your account, you will not be able to use our Services and will lose benefits connected to your existing account.

After receiving the request, we will delete your account and any Personal Data associated with the account if there are no assets or liabilities associated with the account. After the deletion the personal data will be permanently anonymized and used for analytics only.

## Security of Personal Data

All Personal Data we collect is stored in the data centres located in the European Union. Only our authorised employees have access to the personal data whereas they may access the data only for the purposes stipulated in this Privacy Policy.

We employ generally accepted industry standards to protect the Personal Data and we continuously strive to protect your information and privacy as much as we can. We

protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration.

Your data will be saved on Amazon’s AWS European servers that comply with the ISO/IEC 27001 standard. We will use Amazon DynamoDB to save the textual information and images will be saved into an S3 instance. The information will be encrypted with the public-private key pair-based encryption on the user’s computer and directly uploaded to Amazon in encrypted form. We will securely hold the private key and will be able to decrypt the information if requested from us by the authorities.

Unfortunately, no data transmission over Wi-Fi or the Internet or any processing of data via connected digital means can be 100% secure. Thus, we cannot guarantee or warrant the security of any information you disclose or transmit to us online.

### Non-compliance with the Privacy Policy

If you feel that we are not keeping our promises made in this Privacy Policy, or breach other statutory or contractual obligations pertaining to the data processing, you may contact us via [support@envoytoken.io](mailto:support@envoytoken.io) and:

- a) ask us for an explanation;
- b) require us to remedy the arisen state of affairs (in particular by blocking, correction or supplementing of personal data);
- c) appeal directly to the respective data protection authority having the jurisdiction over your personal data (the Estonian Data Protection Inspectorate).

### Use of Cookies

We use cookies to enhance your experience on the Site and to improve the provision of the Services. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website. Envoy uses the information collected from cookies to evaluate the effectiveness of the Site, analyse trends and administer the Site.

This Site is using the following types of its “own” cookies and “third party” cookies:

Name of the “cookie”	Type	Use	How long does th
__ga	3rd party	Google Analytics	2 years
__gid	3rd party	Google Analytics	1 day
__gat	3rd party	Google Analytics	10 min
__cfduid	3rd party	CloudFlare	1 year
__zlcmid	3rd party	ZenDesk	1 year
cookiesAllowed	own	Have cookies been allowed	until year 2100

This Privacy Policy only addresses the use and disclosure of information by envoy. The “third party” cookies may be placed on your browser via the Site for analytical and advertising purposes, but we do not have any control over how the information is collected and used by these third parties. These “third party” cookies may be subject to privacy policies or terms and conditions imposed by these third parties and this Privacy Policy does not apply to, and we are not responsible for, the “third party” cookies or the processing of data the collected through them.

By using the Site, you are agreeing that we may use cookies for the purposes set in this Privacy Policy. The standard browsing software allows placement of cookies on the terminal equipment. These settings can be modified to block the automatic handling of the cookies in the browser or to send a notification every time the cookies are about to be sent to the user's device. Detailed information about the possibilities and the usage of the cookies is available in the software settings (browser). Restrictions in the use of the cookies may affect some of the functionality available on the Site.

## Modifications

We may occasionally modify the Privacy Policy. All changes will be effective upon posting on the Site. We will inform you about the changes as appropriate. You agree to be bound by any such changes if you continue to use the Site after such changes have been posted. We may change, restrict access to, suspend or discontinue the Site or the Services, or any portion thereof, at any time.

## Questions about Our Privacy Policy

If you have any questions or concerns regarding this Privacy Policy, you may contact us by e-mail at [support@envoytoken.io](mailto:support@envoytoken.io)