

# **Conjure Network LLC Privacy Policy**

*Effective September 28, 2018*

Conjure Network LLC (“Conjure,” “us,” “we,” or “our”) operates <http://www.conjure.network> (the “Site” or “Website”).

This Privacy Policy (the “Policy”) informs you (each a “User,” collectively “Users,” or specifically “you”) of our policies regarding the collection, use, and disclosure of personal information we receive from Users of the Site.

We value your privacy like we value our own, so we strive to be as transparent as possible regarding what information we collect and what we do with it.

## **Information We Collect**

The section below details what information we collect from you; we explain why and how we use it in later sections.

Generally, you control the amount and type of information you provide to us when using our Website. The personal information we collect depends on the context of your interaction with the Site. We may ask for an email address or basic personal details. Proceeding through the Token Sale process requires further personal information.

## **Know Your Customer (“KYC”) and Anti-Money Laundering (“AML”) Rules**

Should a User choose to proceed through the Token Sale process, the User must provide personal information mandated by United States rules and regulations.

To comply with KYC and AML regulations, we must verify the identity and status of a User. If you decide to create an account and participate in the Token Sale, we may ask for the following personal information fields:

- *First Name*
- *Last Name*
- *Date of Birth*
- *Email Address*
- *Billing Address*

We may also ask for one or more of the following documents:

## **Proof of Identity**

- **For Individuals:** *Government issued photo ID: International passport, National ID Card, Permanent Driver's License, Official State/Province ID, Photo Confirmation (i.e. a "Selfie")*
- **For Companies:** *Company name, Certificate of Registration, Authority of the company, Passport copy of authorized person acting on behalf of the company.*

## **Proof of Address/Residency**

- *Bank statement, Utility bill, Tax return, property tax bill, Election/Voters ID, Official Government letters*

Information requested may also extend to the appropriate documents related to the *Accredited Investor Verification* process. We take appropriate measures to protect this sensitive information, see "*How We Keep Your Personal Information Secure*" section within this Policy for more information.

## **Information We Collect Automatically**

We may collect non-personal information about Users whenever they interact with our Site. This includes:

### **Cookies**

Our Site may use "cookies" to identify the areas of the Site you visit. Cookies are small text files stored on your computer or mobile device by your web browser. The majority of websites use cookies to collect and retain personal information about their visitors.

Most cookies collect general information, such as how a user arrived at the Site, the device they are using, their Internet Protocol ("IP") address and their approximate geographical location (For example, recognizing a User is visiting from Barcelona). We use cookies for performance, functionality, analytics and fraud prevention.

A User may choose to have their web browser reject cookies, or to alert the User when cookies are being sent. If the User chooses to do this, they should be aware that some parts of the Site may not function properly.

### **Third Party Cookies**

We may also use third party cookies on our Site to help us monitor traffic, identify non-human traffic, to assist with market research, to improve functionality and monitor compliance with our policies.

## **Log and Usage Data**

We automatically receive information from your web browser or mobile device when you access the Site. This may include your IP address, browser type, operating system, referral URLs, type of device, pages visited, links clicked, and Internet Service Provider name.

## **Use of Pixels in Emails**

Our emails often contain a single, campaign-unique “web beacon pixel” to tell us whether, and how many times, our emails are opened and verify any clicks through to links or advertisements within the email. We use this information to determine recipient interest and engagement level. The pixel will be deleted when you delete the email.

## **How and Why We Use Your Personal Information**

- **To run and operate our Website**  
We may need your information in order to display the site correctly and provide access to some features.
- **To facilitate transactions**  
We, along with our authorized payments processors, securely process your payment information to take payments, give refunds and to detect and protect against fraudulent activity.
- **To monitor compliance with our policies and terms**  
We monitor for breaches of our terms and conditions and copyright policies.
- **To send periodic emails**  
If we have news to share about our product or services, we may contact you. We may also contact you with updates, alerts, and other administrative messages. You can opt-out whenever you wish, through your account or contacting customer services.
- **To analyze trends and usage in connection with our Site**  
We may perform statistical and demographic analyses of users and their behavior in order to improve performance of the Site.

## **Disclosure of Your Personal Information**

We do not share, sell, trade or rent User personal information to others. We may share generic aggregated, non-identifiable information with third parties. We ensure that it cannot identify you as an individual prior to sharing it.

Under certain circumstances, we may be required to disclose your personal information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Retention of Your Personal Information**

We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

### **How We Keep Your Personal Information Secure**

We adopt and utilize appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems. In addition, all sensitive information you supply is encrypted via Secure Socket Layer (SSL) technology.

### **Information Regarding Your Data Protection Rights Under General Data Protection Regulation (GDPR)**

For the purpose of this Privacy Policy, we are a Data Controller of your personal information. If you are from the European Economic Area (EEA), our legal basis for collecting and using your personal information described in this Privacy Policy depends on the information we collect and the specific context in which we collect it.

### **Lawful Basis for Processing**

We may process your personal information because:

- **User Consent:** This is where you have given us explicit permission to process personal information for a given purpose.
- **Legitimate Business Purposes:** The processing is in our legitimate interest as a business entity.
- **Contractual Necessity:** When we must process personal information to satisfy contractual obligations.
- **Legal Obligation:** This is where we have to process your information in order to comply with laws and regulations.

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

You can exercise these rights through your account or by contacting customer services. Please note that we may ask you to verify your identity prior to responding to the above requests. Please also note that these rights do not extend to journalists for journalistic practices.

You also 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.

### **COPPA (Children’s Online Privacy Protection Act)**

The Federal Trade Commission (“FTC”), United States’ consumer protection agency, enforces the COPPA Rule, which outlines what operators of websites and online services must do to protect children’s privacy and safety online.

To be clear, Our Website is not designed for use by anyone under the age of 13 (“Child”). We do not specifically market to children, nor do we intentionally collect or use information from children.

### **CAN-SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, and gives recipients the right to have emails stopped from being sent to them. We collect your email address in order to send information, respond to inquiries, and/or other requests or questions.

To be in accordance with CAN-SPAM, regarding messages we send with the primary purpose matching “commercial” criteria, we agree to the following:

- Not use false or misleading header information.
- Not use deceptive subject lines.
- Identify the message as an ad.

- Include the physical address of our business or site headquarters, or post office box registered with the United States Postal Services.
- Tell recipients how to opt out of future email correspondence.
- Honor opt-out/unsubscribe requests promptly.
- Monitor third-party email marketing services for compliance, if one is used.

If at any time you would like to unsubscribe from receiving future emails, you can email us at [info@conjure.network](mailto:info@conjure.network). Another option is to follow the instructions at the bottom of each email and we will promptly remove you from all correspondence.

### **Where This Privacy Policy Applies**

Our Site may contain links to third party websites which are not subject to this privacy policy. We are not responsible for their content, use of personal information, or security practices.

### **Changes**

We may change this Privacy Policy periodically. If we do, we will let you know by revising the date at the top of the document. If we make a change to this policy that, in our sole discretion, is substantial, we will provide you with additional notice (such as adding a statement to the front page of the Website or sending you notification via email). If you continue to use our Site after Privacy Policy changes go into effect, you consent to the revised policy.

### **Contact Us**

If you have questions relating to any of the content outlined in this Privacy Policy, please contact us at the following email address: [info@conjure.network](mailto:info@conjure.network)

### **Conjure Network LLC**

*This policy is effective from September 28, 2018.*