

PRIVACY POLICY

LAST UPDATED 14 MAY 2018

This privacy policy (“**Privacy Policy**”) explains how information is collected, processed used, stored and disclosed by Starwin Co limited, a company duly registered and existing under the laws of Cyprus, (“**Company**”, “**Winstars**”, “**we**”, or “**us**”), before using the “https://winstars.io/” website (“**Website**”) or any services or products made available through this Website (“**Services**”), including access to Winstars Platform (“**Platform**”) possessing its internal tokens called WINS tokens (“**WINS Tokens**” or “**WINS**”), or when you otherwise interact with us.

Anyone who accesses the Website or uses Services (“**You**”) unconditionally agrees and gives us full permission to collect, process, keep, store, use and disclose any and all personal identifying information about yourself which without limitation may include your full name, address, date of birth, age, sex, email address, phone number, photos, ETH-address or other similar address, IP address, email, address, browser type, pages accessed on our website, date and time the website was accessed, survey responses and other information concerning your activity while using the Website or Services (“**Personal Data**”, “**Information**”), in accordance with this Privacy Policy as described in details below.

PLEASE NOTE THAT YOU CANNOT USE THE WEBSITE OR ANY SERVICES UNTIL YOU WILL GIVE YOUR EXPLICIT CONSENT WITH THE PROVISION OF THIS PRIVACY POLICY BY TECHNICALLY SIGNING IT.

We collect, process, use, store, disclose and distribute Personal Data only as described in this Privacy Policy. This Privacy Policy does not apply to Personal Data we collect by any other means (including offline) or from other sources.

I. COLLECTION OF PERSONAL DATA

We may collect Information you provide directly to us. For example, we collect Information you provide when you subscribe to our updates, authorize, or register to our Website, respond to a survey, fill out any form, request customer support, or communicate with us.

If you use the Website or Services, we may collect your payment method information for use in connection with your payments, subject to the applicable law and potential restrictions on the transfer of personal data to third parties and/or abroad.

Winstars does not process any sensitive Personal Data, including, but not limited to information about your religion, race, ethnicity and/or political views.

The Website uses third party services that can collect Information for your identification. We are not responsible for any third party actions.

i. INFORMATION WE COLLECT AUTOMATICALLY

When you use our Services, we automatically collect Information from your devices. For example, we may collect the following Information:

- **Log information:** Information that you provide to us when registering with our Services, including access times, pages views, IP address, and the Website navigation paths.
- **Device information:** We collect Information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, your

web browser, and device identifiers (including a network ID used to communicate with other nodes on the Platform).

- **Usage information:** If you use Platform, we will collect Information contained in or relating to any communication that you send to us or send through Platform (including shard size, number of shards and frequency of access), and metadata associated with the communication. The usage Information also includes your interactions with Services, device Information, such as unique device identifiers, operating system Information, internet service provider, IP address, screen resolution, language, the date and time of each of your log-ins and requests

ii. PURPOSES FOR COLLECTING PERSONAL DATA

Our primary purpose for collecting Personal Data is to comply with applicable law and provide you with a secure, smooth, efficient, and customized experience and to protect your identity within Platform. In particular, we may use your Personal Data to:

- to satisfy the ‘know your customer’ and applicable anti-money laundering and sanctions requirements;
- distribute and account the WINS Tokens;
- provide Services and customer support per your request;
- process transactions and send notices about your transactions;
- prevent potentially prohibited or illegal activities and enforce our Website Terms of Use;
- customize, measure, and improve the Platform and the content and layout of our Website and applications;
- deliver targeted marketing, service update notices, and promotional offers based on your communication preferences; and
- compare Information for accuracy and verify it with third parties.

II. USE OF PERSONAL DATA

We may use your Personal Data to send you newsletters, updates and any other information we deem necessary about the Platform, as well as Platform-related notices, including any notices required by law, in lieu of communication by postal mail. If you correspond with us by email, we may retain the content of your email messages, your email address and our responses.

In addition to some of the specific ways of using Personal Data we describe in this Privacy Policy, we may use information that we receive from you including Personal Data and you unconditionally agree thereto for the following purposes: to deliver and improve our Platform; to provide you with customer support; to perform research and analysis about your use of the Platform; to improve and develop our Platform; to communicate with you; to develop, display, and track content and advertising tailored to your interests on the Platform and other sites; to diagnose or fix technology problems; to verify your identify and prevent fraud or other unauthorized or illegal activity; and to perform functions or services as otherwise described to you at the time of collection.

We will store, retain, use and if necessary disclose your Personal Data as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements.

III. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES. SERVICE PROVIDERS

We can hire any third party contractors as we deem necessary and appropriate (companies or individuals) for the following purposes:

- improving our Services;
- provision of services related to our Website;
- assistance in analysing the way our Website is used;
- any other purposes to ensure proper functioning of our Website in compliance with any applicable law.

You hereby agree that any third parties mentioned above may have access to your Personal Data. The access may be provided solely in order to fulfil the tasks entrusted on our behalf. Nevertheless, it is the third parties' obligation to maintain confidentiality and not use Personal Data for any other purposes.

IV. PERSONAL DATA PROTECTION

We appreciate your trust by providing your Personal Data and will use any commercially reasonable physical, managerial, and technical means to protect Personal Data. However, remember that no method of Personal Data transmission over the Internet or their electronic storage is absolutely safe and secured, so we cannot ensure absolute security. Please note, that we are not liable for the security of any data you are transmitting over the Internet or third party content as well as for any of your losses associated with such transmission.

V. PERSONAL DATA CORRECTION, UPDATE OR REMOVAL

You have right to access your Personal Data and to require the correction, update, or deletion of incorrect or/and inaccurate data by contacting us. To do so, please email us at **info@winstars.io**.

Upon the accepted request, we will provide you with the Personal Data that we collect and store about you and general disclosure of your Personal Data, or will disable your account and remove your Personal Data completely if so requested.

VI. AML/KYC REGULATION

Company is committed to implementing and maintaining the highest standards of Know Your Customer (KYC) and Anti Money Laundering (AML) compliance and requires management and employees to adhere to these standards to prevent abuse of Website and Platform for money laundering and terrorist financing purposes.

In pursuing its commitment to assist in the detection, prevention, and reporting of money laundering activities, Company shall:

1. implement a risk-based approach to assessing and implementing AML and KYC procedures;
2. know its customers by obtaining satisfactory evidence of their identity and having effective procedures to verify the authenticity of the information furnished by new customers;
3. ensure that its business is conducted in conformity with high ethical standards, that laws and regulations are adhered to, and that Services are not provided where there is good reason to believe that transactions are associated with money laundering activities.
4. cooperate fully with law enforcement agencies by, among others, taking appropriate measures allowed by law if there are reasonable grounds for suspecting money laundering;
5. adopt policies consistent with the principles set out in this Privacy Policy, and ensure that its staff, wherever located, are informed of these policies and adequately trained in matters covered herein;
6. implement specific procedures for customer identification, record keeping and retention of transaction documents, and reporting of covered and suspicious transactions.

To prevent abuse of Platform for money laundering and terrorist financing purposes we reserve the right to request the documents and the following Information:

- Photo of Your Passport of other Identity Card to show Proof of Identity;
- Documentation that evidences your Proof of Address;
- Name;
- Telephone Number;
- Origin and source of funds; and
- E-mail address.

VII. THIRD-PARTY SITES AND SERVICES

Website may contain links to other websites. If you click on a third party link you will be redirected to a third party website. We are not responsible for the content, accuracy or opinions expressed in such websites, and such websites are not investigated, monitored or checked for accuracy or completeness by us. Please remember that when you use a link to go from the Website to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including those that have a link on our website, is subject to that website's own rules and policies. We strongly recommend you to read privacy policies on any other websites you visit.

VIII. TRADING

We do not sell, rent, or lease your Personal Data and/or customer lists to third parties without your explicit consent. We may combine your Information with information we collect from other sources and use it to improve and personalize the Services, content, and advertising.

IX. CHILDREN'S PRIVACY POLICY

We understand the importance of taking extra precautions to protect the privacy and safety of children. Children under the age of 18, or equivalent minimum age in the relevant jurisdiction, are not permitted to use this Website and therefore provide any Personal Data, unless their parent provided verifiable consent. If we find out that a child under 18, or equivalent minimum age in the relevant jurisdiction, has provided his or her Personal Data, we will immediately take all steps to delete this Information as soon as possible. If you are a parent or a child's custodian who sends us Personal Data, please immediately contact us so that we can take all appropriate necessary actions.

X. CHANGES IN THE PRIVACY POLICY

We reserve the right, in our sole discretion, to change, modify, add, or remove portions of this Privacy Policy at any time. Any changes or updates will be effective immediately upon posting on the Website. You should review this Privacy Policy regularly for changes. You can determine if changes have been made by checking the date of last amendment above. Your continued use of our Services following the posting of any changes to this Privacy Policy means you consent to such changes.

XI. GOVERNING LAW AND JURISDICTION

This Privacy Policy is governed by *ex aequo et bono* to the maximum extent permitted by laws of England and Wales. Any dispute in connection or arising out of this Privacy Policy, including claims for torts, shall be referred to and resolved by arbitration in accordance with the CAMC Arbitration Rules, except as they may be modified herein or by mutual agreement of the Parties. The appointing authority shall be the Cyprus' Arbitration and Mediation Centre. The number of arbitrators shall be three. One arbitrator shall be selected by you, one arbitrator shall be selected

by Winstars, and the presiding arbitrator shall be nominated by arbitrators selected by the Parties. The seat of arbitration shall be Limassol, Cyprus. Arbitration proceedings shall be conducted on the basis of documents and other materials. The language to be used in the arbitral proceedings shall be Russian. The arbitration award shall be final and binding on the Parties.

XII. PRIVACY QUESTIONS

If you have any questions or suggestions regarding the Privacy Policy, please email us at **info@winstars.io**.