

## REPU Privacy Policy

Last Updated: 01/02/2018

This Privacy Policy explains the collection, use and disclosure of information conducted by REPU (hereinafter - "REPU", "Company" "we", or "us"), before using the website <https://repu.io> or any services or products made available through REPU and this website (collectively, the "Services"), or before your otherwise interaction with us.

The Services include the web page <https://repu.io> and/or any services or products made available through this website, that will issue its internal digital tokens called RepuCoins (hereinafter – the "**RepuCoins**"). RepuCoins will be used as in-service currency for all the smart contracts, integrated with an automated value distribution protocol, based on KPI, that are set by specific users of REPU Services, and within the Services (hereinafter – the "**REPU Platform**"). For detail information about these other devices may collect about you or your device, please read further.

PLEASE NOTE, THAT, YOU CAN NOT USE THE PLATFORM UNTIL YOU WILL GIVE YOUR EXPLICIT CONSENT WITH THE PROVISION OF THIS AGREEMENT BY TECHNICALLY SIGN IT.

### 1. Definitions

**Personally identifiable information** (hereinafter - "**personal information**" or "**information**") is any information that can be directly associated with a specific person and can be used to identify that person. This information you actively provide to us.

**Buyer, User, Customer (you)** – anyone who uses or planning to use the Services or the REPU Platform, where

- (a) Buyer is any person, who uses the REPU Platform or its Services to purchase RepuCoins.
- (b) User is any person, who uses the REPU Platform or it's Services, with prior registration and authorization; and
- (c) Customer (you) is any person, who uses the REPU Platform or it's Services, without prior registration and authorization;

### 2. Collection of Information

There are three ways We collecting information: Customer's provided information, information collected automatically, information collected from other sources.

#### (a) Information Customer Provide to Us

We may collect information Customer provides directly to us. For instance, we collect information Customer provides when Customer subscribes to our Platform, updates, authorize or register to our Services, respond to a survey, fill out any form, request customer support or communicate with us in any manner. The types of information we, at our discretion, may collect include Customer's full name, telephone number, IP address,

residential and email address, ETH-address or other similar address, date of birth, date and time the website was accessed, pages accessed on our website, browser type, survey responses, Customer's status as accredited or professional investor and any other information Customer choose to provide. We also may request further (scanned or depicted) documents from Customer, such as photo of your passport or other identity card to show proof of identity as well as documentation that evidences Customer's proof of address or documents or online database information to confirm the status, or other documents required by authorities to show proof of Customer's identity as well as documentation that is evidence of Customer's residence. We also may collect information about a User's computer or other access devices for fraud prevention, KYC or AML purposes and other information as may be required by terms of REPU Token Sale Agreement ([https://repu.io/token\\_sale\\_agreement.pdf](https://repu.io/token_sale_agreement.pdf)).

Please note, that all such data and documentation is gathered for the purposes of conformity with law and international security practices and regulations. Customer is supposed to provide all those data and documents, we request or ask Customer to provide, in order to use the Services and the REPU Platform.

If Customer uses the REPU Platform, we or our third-party service provider may collect Customer's payment method and other payment information for use in connection with Customer's payments for storage or payments processing.

We do not process any sensitive personal information, such as information about one's religion, race, ethnicity and/or political views.

#### **(b) Information Collected Automatically**

Information about Customer's hardware and software may be automatically collected by us. This information can include usage information that includes Customer's 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 Customer's log-ins and requests. We can also collect the other information due to this Agreement, but only for the needs of the REPU Platform. This information is used for the operation of Services, to maintain quality of the service, and to provide general statistics regarding use of Services and can be received otherwise.

However, we will collect all incoming and outgoing data from the REPU Platform and its connected sources. All of this data will be automatically processed to provide a high-quality output, like all kinds of researches. This grants Customers as well as other REPU Platform users, the right to conduct a specifically targeted survey covering all the necessary questions and get a direct response. Taking it in consideration, Customer agrees that his/her information to be collected in such a manner as well.

Use of cookies and other technologies may allow us and third parties to collect information about Customer's browsing activities over time and across different websites following Customer's use of our Services.

However, Customer should not rely upon our automated search of any Customer's personal data or any information about Customer. So, we sincerely ask Customers to provide us with all and any information placed in appropriate requests or forms for Customers to fill in.

Also, We use cookies on our REPU Platform to allow (a) Customer to navigate from page to page without having to re-login each time, (b) count visits, and (c) us to see which areas and features of our website are popular.

Cookies are small text files that are placed on Customer's computer by websites that Customer visits. 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. We do not link the information We store in cookies to any information Customer submits while on our website. Cookies are typically stored on Customer's computer's hard drive. Information collected from cookies is used by us to evaluate the effectiveness of our Services, analyze trends, and administer our Services (REPU Platform). The information collected from cookies allows us to determine such things as which parts of our Services are most visited and difficulties our visitors may experience in accessing our services. With this knowledge, We can improve the quality of Customer's experience with our Services by recognizing and delivering more of the most desired features and information, as well as by resolving access difficulties.

### **(c) Information Collected from Other Sources**

In order to provide Customer with the best Services possible, we also use third party service providers, which we entrust storing data, its collection and analysis. We believe that all third party service providers are important to our effective operation. They have their own privacy policies and their own conditions, whether to collect Customer's data or opt-out from it. Thus, we do recommend Customer to getting himself acquainted with the terms of third party service provider, if Customer uses other services on our Platform.

By default, we will not seek any of Customer's Personal Information through any other software platforms, data web resources etc., even if this information is necessary for Customer or his usage of the REPU Platform, but we or our third-party service provider may do it for the conformance and verification purposes.

### **Personal Information collecting purpose**

Our primary purpose for collecting personal information is to provide Customer with a secure, smooth, efficient, and customized experience. We may use Customer personal information to:

- (i) provide the Services and customer support per Customer's request;
- (ii) customize, measure, and improve the Services and the content and layout of our website and applications;
- (iii) compare information for accuracy and verify it with third parties;
- (iv) prevent potentially prohibited or illegal activities ;
- (v) verify Customer's status and / or confirm information Customer provided to us;
- (vi) resolve disputes, collect fees, and troubleshoot problems;
- (vii) process transactions and send notices about Customer transactions;

(viii) distribute and account RepuCoins.

### **3. Purpose of Use and Disclosure Information**

We collect and use Customer's personal information to operate our Services and deliver the Services Customer has requested. We only store your information for no longer than is required for the purposes for which the information may be used. In addition, We have the right to compile Customer's personal information, as well as remove it from the REPU Platform.

We may use information about Customer for various purposes, including to:

- (i) Identify our users;
- (ii) Send Customer technical notices and support and administrative messages;
- (iii) Administer our Services;
- (iv) Monitor and analyze trends, usage and activities in connection with our Services;
- (v) Develop new products and services;
- (vi) Link or combine information we collect from or about Customer;
- (vii) Personalize our Services for Customer;
- (viii) Communicate with Customer about products, services, REPU Platform itself, promotions, events and other news and information we think will be of interest to Customer;
- (ix) Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of REPU and others;
- (x) Provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information) and
- (xi) Verify compliance with the terms and conditions governing the use of our Services (including monitoring private messages sent through our website private messaging service).

We may share your personal information:

- (i) with other REPU affiliated entities, in order to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services and communications;
- (ii) with state organs in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- (iii) with service providers that perform work for us (such as hosting providers, identity verification, investor status verification, support, payment, tokens accounting and email service providers etc.);

(iv) with any third person if we believe Customer's actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of REPU or others;

(v) between and among Company and its current and future parents, affiliates, subsidiaries and other companies under common control and ownership; or

(vi) when we believe, in our sole discretion, that the disclosure of personal information is necessary to report suspected illegal activity , and

(vii) 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;

We may also share aggregated or de-identified information, which cannot reasonably be used to identify Customer.

#### **4. Storing and Marketing of Information**

In accordance with applicable laws and as needed to provide services to our Users, we may hold Customer's personal information. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain Customer's personal information so long as your account is active. Moreover, Customer information may be hold beyond the abovementioned period till it is indispensable for us to have relevant information to respond to any issues that may arise later.

Please note that the REPU has prepared Whitepaper (<https://repu.io/whitepaper.pdf>) to describe the technical matters related to the REPU Platform itself, User Accounts and RepuCoins, included, but not limited to, any technological aspects and software matters.

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

#### **5. Analytics Services Provided by Others**

We may allow others to provide analytics services on our behalf in connection with our Services. These persons may use cookies and other technologies to collect information about Customer's use of the Platform and Services and other websites and apps (if any), including Customer's IP address, web browser, pages views, app performance, time spent on pages and links clicked. This information may be used by REPU and others to, among other things, analyze and track data, determine the popularity of certain content and better understand Customer's online activity.

#### **6. Information Change and Removing**

Customer has right to access to Customer's personal information and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting us, please email us [info@repu.io](mailto:info@repu.io).

Upon the accepted request, we will provide Customer with the personal information that we collect and store about Customer and general disclosure of his/her personal information. To disable Customer's account and remove his/her personal information completely, we sincerely ask Customer to email us at [info@repu.io](mailto:info@repu.io) with a request.

## **7. Security**

We use relevant electronic and procedural safeguards to protect the privacy of the information Customer provides to Company 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 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.

All RepuCoins operations on the REPU Platform, including but not limited to those between user accounts, have their own compulsory and automated hash value for entry into the chain of blocks recorded into blockchain register.

Blockchain security is provided by data records of all RepuCoins movements from one account to another, with the obligatory and automatic hash recording into the Blockchain. The flow-of-funds record is open to the public. However, the registry information is unchangeable and anonymous.

## **8. Notice to parents**

Parents or guardians: We want to help Customer guard his children's privacy. We encourage Customer to talk to his/her children about safe and responsible use of their and his/her personal information while using Internet.

Company's web-resources and web-resources of our affiliates, licensees, agents etc. in the part they use under our license or assignment does not publish any data that is targeted to children. So, that We advice Customer to refrain his/her children from using web-resources, mentioned in this paragraph and ask them not to use them. However, we ask Customer to pay attention that all and any actions taken under your registration data in the Company's web-resources and web-resources of our licensees, agents etc. shall be considered to be taken by Customer namely.

## **9. Changes to this Policy**

We may amend this policy at any time by posting a revised version on our Websites. The revised version will be effective at the time we post it. In addition, if the revised version includes any substantial changes to the manner in which Customer's personal information will be processed, we will provide Customer with prior notice by posting notification of the change on the "Privacy Policy" area of our website or any Services made available through our Websites.

We encourage Customer to periodically check this page for the latest information on our privacy policy.

## **10. Contact us**

If you have questions concerning this Privacy Policy, or you notice any bugs, errors or violations please feel free to send us an email at [info@repu.io](mailto:info@repu.io).