

CREATIVE WORK NEEDS
SOLITUDE. IT NEEDS
CONCENTRATION, WITHOUT
INTERRUPTIONS. IT NEEDS THE
WHOLE SKY TO FLY IN, WITH NO
EYE WATCHING UNTIL IT COMES
TO THAT CERTAINTY WHICH IT
ASPIRES TO, BUT DOES NOT
NECESSARILY HAVE AT ONCE.
PRIVACY, THEN. A PLACE APART--
TO PACE, TO CHEW PENCILS, TO
SCRIBBLE AND ERASE AND
SCRIBBLE AGAIN. ~MARY
OLIVER, UPSTREAM

PRIVACY STATEMENT

Rovio, 14.08.2019

Rev. 2019.29

Contract Number: SGT.PP.18.029

LIRAX.ORG Privacy Statement

Last Update: 26 August 2019

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1. Overview

LIRAX™ has developed this Privacy Statement to explain how we may collect, retain, process, share and transfer your Personal Data when you visit our Sites or use our Services. This Privacy Statement applies to your Personal Data when you visit Sites or use Services, and does not apply to online websites or services that we do not own or control, including websites or services of other LIRAX™ Users.

For the avoidance of doubt, this Privacy Statement does not constitute a “framework contract” for the purpose of the EU Payment Services Directive (2007/64/EC) or any implementation of that Directive in the European Economic Area.

This Privacy Statement is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. Please note that our Service offerings may vary by region. This Privacy Statement may be supplemented with additional notices depending on the Sites and Services concerned. Supplementary information can be found in the Statement on Cookies and Tracking Technologies and the Banking Regulations Notice.

We have defined some terms that we use throughout the Privacy Statement. You can find the meaning of a capitalised term in the Definitions section.

Please contact us if you have questions about our privacy practices that are not addressed in this Privacy Statement.

2. What Personal Data Do We Collect?

We collect Personal Data about you when you visit our Sites or use our Services, including the following:

- Registration and use information – When you register to use our Services by establishing an Account, we will collect Personal Data as necessary to offer and fulfil the Services you request. Depending on the Services you choose, we may require you to provide us with your name, postal address, telephone number, email address and identification information to establish an Account. We may require you to provide us with additional Personal Data as you use our Services.
- Transaction and experience information – When you use our Services or access our Sites, for example, to timestamp a document or certify your role inside a group of people we collect information about the transaction, as well as other information associated with the transaction including information about any funding instruments used to complete the transaction, Device Information, Technical Usage Data, and Geolocation Information.
- Participant Personal Data – When you use our Services or access our Sites, we collect Personal Data you provide us about the other participants associated with the transaction.
 - Send or request LRX: When you send or request LRX through the Services, we collect Personal Data such as name, postal address, telephone number, and financial account information about the participant who is receiving LRX from you or sending LRX to you. The extent of Personal Data required about a participant may vary depending on the Services you are using to send or request money.
 - Pay or request someone else to pay a bill: If you use our Services to pay a bill for the benefit of someone else, or if you request a User to pay a bill for you, we collect Personal Data from you about the account holder such as name, postal address, telephone number, email address, and account number of the bill that you intend to pay or request to be paid.
 - Add value to your accounts: If you use our Services to add value to your Account or any other account you may have, or if you ask a User to add value to any of these accounts, we may collect Personal Data from you about the other party, or from the other party about you to facilitate the request. For example, if you use our Services to reload a mobile phone, or to request value be added to your mobile account, we may collect Personal Data and other information including mobile account number from the other participant.
- Personal Data about your friends and contacts – It may be easier for us to help you transact with your friends and contacts if you choose to connect your contact list information with your Account. If you establish an account connection between your device or a social media platform and your Account, we will use your contact list information (such as name, address, email address) to improve your experience when you use our Services.
- Personal data that you choose to provide us to obtain additional Services or specific online Services – If you request or participate in an optional Site feature, or request enhanced Services or other elective functionality, we may collect additional information from you. We will provide you with a separate notice at the time of collection, if the use of that Personal Data differs from the uses disclosed in this Privacy Statement.
- Personal Data about you if you use the Service "Checkout without a LIRAX™ Account" Certain limited Services are available without being required to log in to or establish an Account, also referred to as Checkout without a LIRAX™ Account. We will collect Personal Data, Email Addresses, Device Information, Technical Usage Data, and Geolocation Information as necessary to complete the transaction. If you are an Account holder and choose to engage in a Checkout without a LIRAX™ Account transaction, we may collect information about the transaction and associate it with your Account as part of our compliance and analytics operations. If you are not an Account holder you can receive a Voucher, but you need Activate a full Account to use it.
- Personal Data about you from third-party sources – We obtain information from third-party sources such as merchants, data providers, and credit bureaus, where permitted by law.
- Other information we collect related to your use of our Sites or Services – We may collect additional information from or about you when you communicate with us, contact our customer support teams or respond to a survey.

3. Why Do We Retain Personal Data?

We retain Personal Data in an identifiable format for the least amount of time necessary to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law.

If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal data in accordance with this Privacy Statement.

The cookies we use have defined expiration times; unless you visit our Sites or use our Services within that time, the cookies are automatically disabled and retained data is deleted. Please consult our Statement on Cookies and Tracking Technologies for more information.

4. How Do We Process Personal Data?

We may Process your Personal Data for a variety of reasons that are justified under data protection laws in the European Economic Area (EEA) and Switzerland.

- To operate the Sites and provide the Services, including to:
 - initiate a Blockchain transaction, send or request LRX, or pay a bill
 - authenticate your access to an Account
 - communicate with you about your Account, the Sites, the Services, or LIRAX™
 - create an account connection between your Account and a third-party account or platform
 - verify personal documents inside the Platform
 - trace the identity of the User for Private/Public signed documents, or trace the identity of the User inside a specific supply-chain
 - keep your Account up to date.
- To manage our business needs, such as monitoring, analysing, and improving the Services and the Sites' performance and functionality. For example, we analyse User behavior and perform research about the way you use our Services.
- To manage risk and protect the Sites, the Services and you from fraud by verifying your identity. LIRAX™'s risk and fraud tools use Personal Data, Device Information, Technical Usage Data, and Geolocation Information from our Sites and websites that offer LIRAX™ Services to help detect and prevent fraud and abuse of the Services.
- To comply with our obligations and to enforce the terms of our Sites and Services, including to comply with all applicable laws and regulations.
- For our legitimate interests, including to:
 - enforce the terms of our Sites and Services;
 - manage our everyday business needs, such as monitoring, analysing;
 - manage risk, fraud, and abuse of LIRAX™ Services;
 - anonymise Personal data in order to provide aggregated statistical data to third parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services; and
 - provide personalised Services (also called interest-based marketing) offered by LIRAX™ on third-party websites and online services. We may use your Personal Data and other information collected in accordance with this Privacy Statement to provide a targeted display, feature or offer to you on third-party websites.
- With your consent, including to:
 - To market to you about LIRAX™ products and Services and the products and services of unaffiliated businesses. We may also Process your Personal Data to tailor the marketing content and certain Services or Site experiences to better match your interests on LIRAX™ and other third-party websites.
 - To use cookies and other tracking technologies to provide a targeted display, feature, Service or offer to you and/or to work with other third-parties such as merchants, advertising or analytics companies to provide these personalised services (also called interest-based marketing).
 - To provide you with location-specific options, functionality or offers if you elect to share your Geolocation Information through the Services. We will use this information to enhance the security of the Sites and Services and provide you with location-based Services, such as advertising, search results, and other personalised (also called interest-based marketing) content.
 - To make it easier for you to find and connect with others, we may use your information you have shared with the Service to suggest connections between you and people you may know. For example, we may associate information that we learn about you through your and your contacts' use

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of the Services, and information you and others provide to suggest people you may know or may want to transact with through our Services. Social functionality and features designed to simplify your use of the Services with others vary by Service.

- To respond to your requests, for example to contact you about a question you submitted to our customer service team.

You can withdraw your consent at any time and free of charge. Please refer to the section on “Your Privacy Choices” for more information on how to do that.

5. Do We Share Personal Data?

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Statement. We may share your Personal Data or other information for the following reasons:

- With other members of the LIRAX™ corporate family: We may share your Personal Data with members of the LIRAX™ family of entities to, among other things, provide the Services you have requested or authorised; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements and to help us manage the availability and connectivity of LIRAX™ products, Services, and communications.
- With other companies that provide services to us: We share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and services, or provide customer support.
- With the other parties to transactions when you use the Services, such as other Users, merchants, and their service providers: We may share information about you and your Account with the other parties involved in processing your LRX transactions. This includes other Users you are sending or receiving LRX from and merchants, and their service providers. The information might include:
 - Personal Data and Account information necessary to facilitate the transaction;
 - Personal Data to help other participant(s) resolve disputes and detect and prevent fraud; and
 - Anonymous data and performance analytics to help merchants better understand the uses of our Services and to help merchants enhance Users' experiences.
- With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for LIRAX™'s business purposes or as permitted or required by law, including:
 - if we need to do so to comply with a law, legal process or regulations;
 - to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to LIRAX™ or LIRAX™'s corporate family;
 - if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
 - to protect the vital interests of a person;
 - with credit agencies and data processors for credit reference checks and anti-fraud and compliance purposes;
 - to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
 - to protect our property, Services and legal rights;
 - to facilitate a purchase or sale of all or part of LIRAX™'s business;
 - in connection with shipping and related services for purchases made using a Service;
 - to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Services, including fraud that occurs at or involves our business partners, like services provide by us for certification and traceability solutions;
 - to banking partners as required by card association rules for inclusion on their list of terminated merchants;
 - to credit reporting and collection agencies;
 - to companies that we plan to merge with or be acquired by; and
 - to support our audit, compliance, and corporate governance functions.
- With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorise an account connection with a third-party account or platform.
- In addition, LIRAX™ may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

6. How Do We Work with Other Services and Platforms?

A significant benefit and innovation of LIRAX™'s Services is that you can connect your Account with a third-party account or platform. For the purposes of this Privacy Statement, an "account connection" with such a third-party is a connection you authorise or enable between your Account and a non-LIRAX™ account, payment instrument, or platform that you lawfully control or own. When you authorise such a connection, LIRAX™ and the third-party will exchange your Personal Data and other information directly.

Examples of account connections include:

- linking your Account to a social media account or social messaging service;
- connecting your Account to a third-party data aggregation or financial services company, if you provide such company with your Account log-in credentials; or
- using your Account to make payments to a merchant or allowing a merchant to charge your Account.

If you choose to create an account connection, we may receive information from the third-party about you and your use of the third-party's service. For example, if you connect your Account to a social media account, we will receive Personal Data from the social media provider via the account connection. If you connect your Account to other financial accounts, directly or through a third-party service provider, we may have access to your account balance and transactional information, such as purchases and funds transfers. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this Privacy Statement.

Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorising an account connection, you should review the privacy notice of any third-party that you authorised to have an account connection that will gain access to your Personal Data as part of the account connection. For example, Personal Data that LIRAX™ shares with a third-party account or platform such as a social media account may in turn be shared with certain other parties, including the general public, depending on the account's or platform's privacy practices.

7. International transfers

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers.

The parties mentioned above may be established in jurisdictions other than your own and outside the European Economic Area and Switzerland. These countries do not always afford an equivalent level of privacy protection. We have taken specific steps, in accordance with EEA data protection law, to protect your Personal Data. In particular, for transfers of your Personal Data within LIRAX™ related companies, we rely on Binding Corporate Rules approved by competent Supervisory Authorities (available here). Other transfers may be based on contractual protections. Please contact us for more information about this.

If you make transactions with parties outside the EEA or Switzerland or connect our Service with platforms, such as social media, outside the EEA or Switzerland, we are required to transfer your Personal Data with those parties in order to provide the requested Service to you.

8. How Do We Use Cookies and Tracking Technologies?

When you visit our Sites, use our Services, or visit a third-party website for which we provide online services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, “Cookies”) to recognise you as a User and to customise your online experiences, the Services you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services.

Certain aspects and features of our Services and Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

Please review our Statement on Cookies and Tracking Technologies to learn more about how we use Cookies.

9. What Privacy Choices Are Available To You?

You have choices when it comes to the privacy practices and communications described in this Privacy Statement. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site.

You may be provided with instructions and prompts within the experiences as you navigate the Services.

- Choices Relating to the Personal Data We Collect
 - Personal Data. You may decline to provide Personal Data when it is requested by LIRAX™, but certain Services or all of the Services may be unavailable to you.
 - Location and other device-level information. The device you use to access the Sites or Services may collect information about you, including Geolocation Information and User usage data that LIRAX™ may then collect and use. For information about your ability to restrict the collection and use of such information, please use the settings available in the device.
- Choices Relating to Our Use of Your Personal Data
 - Online Tracking and Interest-Based Marketing. We work with partners and third-party service providers to serve you advertising using ad-related cookies and web beacons. You can opt-out of third-party advertising-related cookies and web beacons, in which case our advertising should not be targeted to you. You will continue to see our advertising on third party websites.
 - For more information on third-party advertising-related cookies and interest-based marketing, and to learn how to opt-out of these practices with companies participating in industry self-regulation, please visit Your Online Choices.
 - Finding and connecting with others. If available, you may manage your preferences for finding and connecting with others from your account of the Service you use.
- Choices Relating to Account Connections
 - If you authorize an account connection to a third-party account or platform, such as a social media account, you may be able to manage your connection preferences from your Account or the third-party account or platform. Please refer to the privacy notice that governs the third-party platform for more information on the choices you may have.
- Choices Relating to Cookies
 - You may have options available to manage your cookies preferences. For example, your browser or internet device may allow you delete, disable, or block certain cookies and other tracking technologies. You can learn more by visiting [AboutCookies.org](https://www.aboutcookies.org). You may choose to enable these options, but doing so may prevent you from using many of the core features and functions available on a Service or Site.
 - You may have an option regarding the use of cookies and other tracking technologies when you use a Service or visit parts of a Site. For example, you may be asked if you want the Service or Site to “remember” certain things about you, and we will use cookies and other tracking technologies to the extent that you permit them.
 - You can learn more about our cookies and tracking technologies by visiting the Statement on Cookies and Tracking Technologies page.
- Choices Relating to Your Registration and Account Information
 - If you have an Account, you generally may review and edit Personal Data by logging in and updating the information directly or by contacting us. Contact us if you do not have an Account or if you have questions about your Account information or other Personal Data.
- Choices Relating to Communication
- Notices, Alerts and Updates from Us:
 - Marketing: We may send you marketing content about our Sites, Services, products, products we jointly offer with financial institutions, as well as the products and services of unaffiliated third parties and members of the LIRAX™ corporate family through various communication channels, for

example, email, text, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications we send by following the instructions in the communications you receive. If you have an Account with us, you may also adjust your communication preferences in your Account settings. For messages sent via push notifications, you may manage your preferences in your device.

- Informational and Other: We will send communications to you that are required or necessary to send to Users of our Services, notifications that contain important information and other communications that you request from us. You may not opt out of receiving these communications. However, you may be able to adjust the media and format through which you receive these notices.

10. What Are Your Rights?

Subject to limitations set out in EEA data protection laws, you have certain rights in respect of your Personal Data. In particular, you have a right of access, rectification, restriction, opposition, erasure and data portability. Please contact us if you wish to exercise these rights. If you wish to complete an access request to all personal data that LIRAX™ holds on you, please note that photo identity will be required to prove your identity.

If you have an Account with any of our Services, you generally can review and edit Personal Data in the Account by logging in and updating the information directly. We may use automated decision-making for decisions concerning credit with your consent or where necessary for the entry into or performance of a contract or authorised by Union or Member state law.

Please contact us if you require more information on automated-decision making.

11. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorised access, disclosure, and alteration.

The security measures include firewalls, data encryption, physical access controls to our data centres, and information access authorisation controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current.

We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorised.

12. Can Children Use Our Services?

The Sites and Services are not directed to children under the age of majority, as defined by applicable law in your country of residence.

We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Sites and Services.

If we obtain actual knowledge that we have collected Personal Data from a child under the age of majority, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from a child under the age of majority.

13. What Else Should You Know?

Changes to this Privacy Statement.

We may revise this Privacy Statement from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Statement will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on the “Policy Update” page of our website. We also may notify Users of the change using email or other means.

14. Contact Us

You may contact us if you have general questions or concerns about this Privacy Statement and supplemental notices or the way in which we handle your Personal Data.

We want to make sure your questions go to the right place:

- Write to privacy@lirax.org to contact us about your LIRAX™ account
- Write to privacy.qli@lirax.org to contact us about your Sales Account with Q.L.I. Ltd.

If you are not satisfied by the way in which we address your concerns, you have the right to lodge a complaint with the Supervisory Authority for data protection in your country.

Our Data Protection Officer can be contacted at dpo@lirax.org or Sangetall SA, Privacy Department, via Angelo Frigerio 3, 6821 Rovio, Svizzera

15. Definitions

- Account means a LIRAX™ member account, KYC verified.
- Device Information means data that can be automatically collected from any device used to access the Site or Services. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device IP address; information about your device's web browser and internet connection you use to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data.
- Geolocation Information means information that identifies, with reasonable specificity, your location by using, for instance, longitude and latitude coordinates obtained through GPS or Wi-Fi or cell site triangulation.
- Checkout without a LIRAX™ Account means a person's Use of the Services without logging into and/or establishing an Account.
- LIRAX™ means Sanngetall SA and subsidiaries or affiliates. In this Privacy Statement, LIRAX™ is sometimes referred to as "we," "us," or "our," depending on the context.
- Personal Data means information that can be associated with an identified or directly or indirectly identifiable natural person. "Personal Data" can include, but is not limited to, name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver's license number, national ID, passport number).
- Process means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.
- Services means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by LIRAX™ with an Account or Checkout without a LIRAX™ Account.
- Sites means the websites, mobile apps, official social media platforms, or other online properties through which LIRAX™ offers the Services and which has posted or linked to this Privacy Statement.
- Technical Usage Data means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.
- User means an individual who uses the Services or accesses the Sites and has established a relationship with LIRAX™ or otherwise uses the Services to provide timestamp documents, confirm his identity inside Blockchain groups, confirm he created/modified a specific file/document of Intellectual property element.

16. Additional Information

The information provided in this section may be specific to customers depending on your region or how you use the Services. This information is provided to LIRAX™ from third parties whom you may interact when using the Services.

LIRAX™ uses ReCaptcha on the Sites and Services. Your use of ReCaptcha is subject to the Google Privacy Policy and Terms of Use.

ReCaptcha is only used to fight spam and abuse.