

# **BANDZ Privacy Policy**

## **Chapter 1 General Provisions**

### Article 1 (Basic Principle)

BANDZ Network OÜ (“BANDZ”) complies with the data privacy regulations under the Act on Promotion of Information and Communications Network Utilization and Information Protection, Protection of Communications Secrets Act, Telecommunications Business Act, Personal Information Protection Act and relevant laws and regulations that apply to information and communications service providers. BANDZ is committed to protecting the interests of its participants (“Participants”) by establishing this privacy policy in accordance with relevant laws and regulations.

## **Chapter 2 Items of Personal Information Collected and Methods of Collection**

### Article 2 (Items Collected)

BANDZ collects the following items of personal information from Participants during execution of the Participant identification (KYC) process, in order to register and manage Participants, to provide various services and for marketing.

KYC Process - Email address and password, phone number, name, nationality, address, country of residence, birthdate, sex, passport number or ID number, self photograph, ID card or passport copy, and ETH wallet address for receipt of BANDZ Tokens

### Article 3 (Additional Information Collected during Use of Services)

When Participants use the Services, information such as (i) IP address, (ii) Cookie, (iii) the type and language of browser, and (iv) usage log may be collected by BANDZ.

#### Article 4 (Prohibited Collection of sensitive Personal Information)

BANDZ does not collect sensitive personal information (such as race, ideology, creed, political orientation, criminal record, or medical information) that may infringe on the basic human rights of the Participant.

#### Article 5 (How to Collect Personal Information)

BANDZ collects Participants' personal information in the following way:

- A. Collection through voluntary disclosure by Participants during service use or during the Participant identification process
- B. Automatic collection through the use of BANDZ's service programs

### **Chapter 3 Purpose of Collection and Use of Personal Information**

#### Article 6 (Purpose of Collection and Use of Personal Information)

BANDZ collects and uses Participants' personal information for the following purposes:

- A. Participant management: identification and authentication of Participants, prevention of unauthorized use of service, various notices and notices
- B. Providing services
- C. Participant identification (KYC) process: verification of name of person wishing to purchase BANDZ Tokens, verification of identity of person executing transaction with BANDZ Tokens.

### **Chapter 4 Sharing and Providing Personal Information**

#### Article 7 (Basic Principles of Sharing and Providing Personal Information)

BANDZ shall use the personal information of Participants within the range notified in Article 6 and shall not use the personal information of Participants outside of such range or disclose the personal information of Participants to third parties without the prior consent of the Participant. However, the following cases shall be excluded:

- A. The Participant agrees in advance
- B. Personal information is processed and provided in a way that makes it impossible to identify a specific individual for statistical purposes
- C. There is a request from an investigating agency for the purpose of an investigation in accordance with procedures and methods prescribed in the law

## **Chapter 5 Entrustment of Handling Personal Information**

Article 8 (Entrustment of Handling Personal Information)

## **Chapter 6 Retention and Use Period of Personal Information**

Article 9 (Basic Principles of Personal Information Retention and Usage Period)

In principle, personal information of Participants is destroyed without delay when the purpose of collecting and using personal information is achieved.

Article 10 (Retention of Personal Information under BANDZ's Internal Policy)  
Notwithstanding Article 9, in order to prevent disputes related to the Services, BANDZ shall transfer information related to Participants management in a separate DB (in the case of information recorded on paper to a separate document) in accordance with the internal policy of

BANDZ and keep it for the following period, and use it only within the scope of its purpose.

- A. If an investigation is underway for a violation of the relevant laws by a Participant: Until the end of investigation
- B. If there is a debt relationship between BANDZ and the Participant: Until the settlement of the relevant debt

#### Article 11 (Retention of Personal Information by Relevant Laws and Regulations)

Notwithstanding Article 9, BANDZ shall transfer information related to Participants management in a separate DB (in the case of information recorded on paper to a separate document) in accordance with the relevant laws and regulations and keep it for the required period, and use it only within the scope of its purpose.

### **Chapter 7 Destruction of Personal Information**

#### Article 12 (Procedures and Methods of Destroying Personal Information)

1. BANDZ will destroy the personal information within (i) 5 days from the date of termination of the personal information retention period under Article 9 to Article 11 or (ii) 5 days from the day when the processing of personal information is deemed unnecessary if the personal information becomes unnecessary (including completion of the processing of personal information, abolition of service, termination of business) in accordance with Paragraph 3.
2. BANDZ shall identify personal information that has a reason to be destroyed, and destroy the personal information with the approval of the person in charge of personal information protection.
3. BANDZ will destroy personal information in the following ways:
  - A. Personal information recorded and stored on paper: Destruction by shredding or incinerating
  - B. Personal information stored in electronic file format: Destruction by using a technical method such as low-level format so that the record cannot be restored

## **Chapter 8 Participant's Rights**

Article 13 (Withdrawal of Consent to the Collection, Use and Disclosure of Personal Information)

1. A Participant may withdraw consent to the collection, use and disclosure of personal information through the Participant identification (KYC) process at any time.
2. Withdrawal of the consent may result in restrictions on the use of the service.

Article 14 (Requests to View, Verify, and Correct Personal Information)

1. If a Participant requests to view, verify or correct personal information, BANDZ shall (i) not use or provide such personal information until the correction or deletion is completed, (ii) respond sincerely to the request of the Participant, (iii) take necessary measures without delay if it is deemed necessary to correct or delete the personal information (including if there is an error in the personal information or if the retention period of the personal information has elapsed).
2. When a Participant requests to view or verify through wire or written communication, BANDZ shall confirm whether the request is true to the person's intention by requiring a copy of the requesting party's ID.

Article 15 (Restrictions on Accessing and Viewing Personal Information)

1. The personal information that has been canceled or deleted at the request of a Participant is processed as specified in Articles 9 to 11, and is processed so that it can't be viewed or used for any other purpose.
2. A Participant may view or modify registered personal information at any time.

Article 16 (How to Exercise Rights) Participants may exercise the rights of this Chapter by means of written communication, mail or fax to BANDZ.

Article 17 (Exercising the Rights of Agents)

Participants may exercise the rights of this Chapter through their legal representatives or their authorized representatives. In this case, the Participant must submit the power of attorney in accordance with the Personal Information Protection Act.

## **Chapter 9 Matters on Installation / Operation and Rejection of Automatic Collection Device of Personal Information**

### Article 18 (Use of Cookies)

1. BANDZ uses cookies or similar technologies (hereinafter referred to as “cookies”) that store and access from time to time Participants’ access information. Cookies are a small amount of information stored on the device when a Participant visits an application and stores information that can be read when the Participant returns.

2. BANDZ uses cookies for the following purposes.

A. Maintain a Participant’s connection session

B. Service visit and usage behavior analysis

C. Security access

3. The installation of cookies is at the option of Participants. The installation of cookies will be executed pursuant to the browser settings set by Participants which may accept all cookies, request consent for installation each time a cookie is saved, or reject installation of all cookies. Please note that if you refuse to install the cookies, you will face inconvenience in using the website and may have difficulty using some services that require login.

## **Chapter 10 Technological / Administrative Protection Measures of Personal Information**

### Article 19 (Minimizing and Educating Processing Staff)

The personal information processing staff of BANDZ is limited to the person in charge, and a separate password is assigned to it so that it is updated regularly.

Through regular training for the person in charge, BANDZ always emphasizes compliance with the personal information processing policy.

#### Article 20 (Establishment and Enforcement of Internal Management Plan)

BANDZ has established an internal management plan for the safe processing of personal information.

#### Article 21 (Encryption of Personal Information)

Personal information of Participants is encrypted and stored and managed. Only the Participant can know it, and important data is encrypted by encrypting the file and transmission data, or using the file security function.

#### Article 22 (Restrict Access to Personal Information)

BANDZ takes necessary measures to control access to personal information through the granting, modification and cancellation of access to the database system handling personal information and controls unauthorized access from outside by using an intrusion prevention system.

### **Chapter 11 Miscellaneous**

#### Article 25 (Notice of Personal Information Processing Policy and Notification Method)

1. In case of addition, deletion or modification of the current personal information processing policy, BANDZ will notify the reason and contents of the change through the Notice section of the electronic bulletin board managed and operated by BANDZ at least 7 days before the amendment. However, if there is any significant change in the Participant's rights in the collection and utilization of personal information, we will notify you at least 30 days in advance.

2. If BANDZ wishes to use the personal information of a Participant beyond the agreement of the Participant or obtain the additional consent of a Participant to entrust the handling to a third party, BANDZ shall individually notify the Participant in writing, by mail or telephone.

3. If BANDZ entrusts the collection, storage, processing, use, provision, management or destruction of personal information to a third party, BANDZ will notify the Participant through the Terms of Service and Privacy Policy.

This Privacy Policy shall be effective as of June 14th, 2018.