

## **Privacy Policy**

This Privacy Policy describes the policies and procedures of Energitoken, (“Energitoken,” “we”, “our” or “us”) on the collection, use and disclosure of your information on [www.Energitoken.com](http://www.Energitoken.com), the Energitoken mobile application for iOS or Android (the “Energitoken App”), and any associated applications or platforms (collectively, the “Applications”), and in connection with your use of any services, features, or content offered through the Applications (collectively, the “Services”) by Energitoken. All defined terms that are not defined in this Privacy Policy shall have the meanings given to them in the Energitoken, Terms of Use (“Terms of Use”).

Energitoken receives information about you from various sources, including: (i) if you register for the Applications or Services, through your Account; (ii) your use of the Applications and Services generally; and (iii) from Third-Party Services such as third party websites, services, and applications. When you use the Applications and Services, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy.

### **What Does This Privacy Policy Cover?**

This Privacy Policy covers the treatment of personally identifiable information (“Personal Information”) gathered when you are using or accessing the Applications or Services. This Privacy Policy also covers our treatment of any Personal Information that our Business Partners (defined below) share with us or that we share with our Business Partners.

We may use this Personal Information to Personalise and improve our services, to allow our users to set up a user account and profile, to contact users, to fulfil your requests for certain products and services, to analyse how users utilise the Services, and as otherwise set forth in this Privacy Policy. We may share certain types of Personal Information with third parties, as described below.

This Privacy Policy does not apply to the practices of third parties that we do not own or control, including but not limited to any Third-Party Services that you elect to access or enable through the Service or to individuals that we do not manage or employ. While we attempt to facilitate access only to those Third-Party Services that share our respect for your privacy, we cannot and do not take responsibility for the content or privacy policies of those Third-Party Services. We encourage you to carefully review the privacy policies of any Third-Party Services you access.

We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for the Services. If you are under 13, please do not attempt to access the Applications, register for the Services, or send any information about yourself to us, including your name, address, telephone number or email address. No one under age 13 may provide any personal information to us or on the Applications or Services. In the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at [contact@energimine.com](mailto:contact@energimine.com)

### **What Information Do We Collect?**

**Account Information:** When you create an Account, you will provide information that could be Personal Information, such as your name, username, password, gender, phone number and email address. You acknowledge that this information may be personal to you, and by

creating an account on the Services and providing Personal Information to us, you allow others, including us, to identify you and therefore may not be anonymous. Energitoken may occasionally use your contact information to send you information about your Account or in connection with the Services, as described further in our Terms of Use and throughout the Services. You may unsubscribe from these messages through your Account settings, by emailing [contact@energimine.com](mailto:contact@energimine.com), and/or by other means, although we, regardless, reserve the right to contact you when we believe it is necessary, such as for account recovery purposes.

**Information Regarding Your Social Networks:** You may be able to register for or access the Services using a Third-Party Service, such as your social media account (e.g. Facebook, Twitter, etc.). Occasionally, you can also use your Account on our Services to interact with your accounts on these other services. For example, you may be able to access posting and sharing tools on the Services that allow you to post information to your social networks outside of the Services (“Share”). By using these tools, you acknowledge that some account information from your account on the applicable Third-Party Service may be transmitted into your Account with us. Furthermore, if a tool, such as the Share tool, is operated by a Third-Party Service, the Third-Party Service that operates the tool may collect information about your browser or online activity, which would be subject to the Third-Party Service’s privacy policy. When you use these tools, some of your information from the Services may be shared with the Third-Party Service and others. Therefore, we encourage you to read the privacy policies and other policies of any Third-Party Services, including without limitation any applicable social networks, you use in connection with the Services.

Additionally, we may collect and receive your social media account login credentials in connection with providing you with the Services, but only if you expressly provide us with such information. We will only use such login information as set forth in this Privacy Policy or as otherwise expressly authorised by you.

**Information You Provide to Us:** We collect information you provide directly to us. You can choose not to provide us with certain information, but then you may not be able to register with us or to take full advantage of the Services. We may anonymise your Personal Information so that you cannot be individually identified, and may provide that anonymised information to our partners.

**User Content:** Some features of the Services allow you to provide User Content to the Services, such as written comments. All User Content submitted by you to the Services may be retained by us indefinitely, even after you terminate your Account. We may continue to disclose such content to third parties in a manner that does not reveal Personal Information, as described in this Privacy Policy.

**Financial Information:** Financial information, such as your bank account number, type, or other financial information, as applicable, is collected and stored by our third party payment provider (the “Payment Provider”), and use and storage of that information is governed by the Payment Provider’s applicable terms of service and privacy policy. Energitoken does not collect financial information.

**Transaction Information:** We collect transaction details related to your use of our Applications and Services, including without limitation which Coupons you view, select, reject or redeem; when you access or use the Energitoken Wallet; any linked Loyalty Account information; any contact information you choose to add to your Account; items you purchase from Merchants, and the dates and times when you take the actions described above using the Services.

**Location Information:** When you use the Applications and Services, we may collect precise location data about your location. We may also approximate your current location using your IP address. Where you have allowed the Applications to access location services through your mobile operating system's permission system, we may also collect the location of your device when the Services are running in the foreground or background.

**Device Information:** We may collect information about the computer or mobile device you use to access the Applications and Services. This information may include the hardware model, operating system and version, and other unique device identifiers.

**IP Address Information and Information Collected Automatically:**

- Generally, the Applications and/or Services automatically collect usage information, such as the number and frequency of visitors to the Applications and users of the Services. We may use this data in aggregate form, that is, as a statistical measure, or in other anonymous forms, but not in a manner that would identify you personally. This type of data enables us and third parties authorised by us to figure out how often individuals use parts of the Applications and Services so that we can analyse and improve them.
- We automatically receive and record information from your web browser when you interact with the Applications and Services, including your IP address and cookie information. This information is used for fighting spam/malware and also to facilitate collection of data concerning your interaction with the Applications and Services (e.g., what links you have clicked on).
- We may collect some device-specific information if you access the Applications and Services using a mobile device. Device information may include but is not limited to unique device identifiers, network information, and hardware model, as well as information about how the device interacts with our Services.

**Cookies:** "Cookies" are identifiers we transfer to your computer or mobile device that allow us to recognise your browser or mobile device and tell us how and when pages and features in our Applications and Services are visited and by how many people. You may be able to change the preferences on your browser or mobile device to prevent or limit your computer or device's acceptance of cookies, but this may prevent you from taking advantage of some of our features.

- Our cookies do not, by themselves, contain Personal Information, and we do not combine the general information collected through cookies with other Personal Information to tell us who you are. As noted, however, we do use cookies to identify that your web browser or mobile device has accessed aspects of the Services and may associate that information with your Account if you have one.
- Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. We strongly recommend that you leave cookies active, because they enable you to take advantage the most attractive features of the Services.
- This Privacy Policy covers our use of cookies only and does not cover the use of cookies by third parties. We do not control when or how third parties place cookies on your computer. For example, third party websites to which a link points may set cookies on your computer.

**Email, SMS, and Push Notification Communications:** We may communicate with you via email, SMS or other text message ("Text Message") or push notifications, to the extent you

permit us to do so, and we may collect information regarding such communications, such as confirmation when you open an email, read a Text Message or receive a push notification. We use this information to improve our Services, including without limitation our customer service. We will never share this information with a third party, except as expressly provided in our Privacy Policy. You may opt-out of receiving these messages at any time by sending us a request at [contact@energimine.com](mailto:contact@energimine.com), and, if you have previously elected to receive Text Messages from Energitoken, you may also opt out by responding "STOP" to any Text Message. You acknowledge that opting out of receiving text (SMS) messages may impact your use of the Services.

#### **Information Related to Advertising and the Use of Web Beacons:**

- To support and enhance the Services, we may serve advertisements, and also allow third parties advertisements, through the Services. These advertisements are sometimes targeted and served to particular users and may come from third party companies called "ad networks." Ad networks include third party ad servers, ad agencies, ad technology vendors and research firms.
- Advertisements served through the Services may be targeted to users who fit a certain general profile category and may be based on (i) anonymised information inferred from information provided to us by a user, including Personal Information (e.g., gender or age); (ii) Services usage patterns or (iii) user activity on Third-Party Services. Energitoken does not provide Personal Information to any ad networks for use outside of the Services.
- To increase the effectiveness of ad delivery, Energitoken may deliver a file (known as a "web beacon") from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Because your web browser must request these advertisements and web beacons from the ad network's servers, these companies can view, edit or set their own cookies, just as if you had requested a web page from their site.

**Aggregate Information:** We collect statistical information about how you use the Services ("Aggregate Information"). Some of this information is derived from Personal Information. This statistical information is not Personal Information and cannot be tied back to you, your Account or your web browser.

#### **How, and With Whom, Is My Information Shared?**

**Public Information About Your Activity on the Services:** Some of your activity on and through the Applications and Services is public. This may include, but is not limited to, User Content you have posted publicly on, through or in connection with the Applications and Services, including without limitation on public portions of Third-Party Services, such as your social media accounts. Please remember that if you choose to provide Personal Information using certain public features of the Applications and Services, then that information is governed by the privacy settings of those particular features and may be publicly available. Individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge, and search engines may index that information. We therefore urge you to think carefully about including any specific information you may deem private in content that you create or information that you submit through the Applications and Services.

**IP Address Information:** While we collect and store IP address information, that information is not made public. We do at times, however, share this information with our partners,

service providers and other persons with whom we conduct business, and as otherwise specified in this Privacy Policy.

**Information You Elect to Share:** You may access other Third-Party Services through the Services, for example by clicking on links to those Third-Party Services from within our Services. We are not responsible for the privacy policies and/or practices of these Third-Party Services, and you are responsible for reading and understanding those Third-Party Services' privacy policies. This Privacy Policy only governs information collected on the Services.

**Aggregate and Non-Personally Identifiable Information:** We share Aggregate Information with our partners, service providers and other persons with whom we conduct business ("Business Partners"). We may also share information with our Business Partners that is (i) not Personal Information or (ii) derived from Personal Information but has been anonymised so that it is no longer personally identifiable (collectively with Aggregate Information, "Non-Personal Information"). We use and share this type of data so that we and our Business Partners can understand how and how often people use our and their services or websites, which facilitates improving our Services, their services and how our Services interface with their services. In addition, these Business Partners may share with us non-private, aggregated or otherwise non-Personal Information about you that they have independently developed or acquired.

**User Profile Information:** User profile information including your username and other information you enter may be displayed to other users to facilitate user interaction within the Services. We will not directly reveal user email addresses to other users.

**Financial Information:** As stated above, we do not currently collect financial information, as that information is collected and stored by our Payment Provider. However, we may from time to time request and receive some of your financial information from our Payment Provider for the purposes of completing transactions you have initiated through the Services, enrolling you in discount, rebate, and other programs in which you elect to participate, protecting against or identifying possible fraudulent transactions, and otherwise as needed to manage our business.

**Information Shared with Certain Business Partners:** If you elect to register for the Energitoken Plus Service, we may need to share your Personal Information with certain Business Partners, including our Payment Provider and Allocation Recipients, in order to provide the Energitoken Plus Services to you. Unless we tell you differently, these Business Partners do not have any right to use Personal Information or other information we share with them beyond what is necessary to assist us. When registering for the Energitoken Plus Service, you thereby consent to our sharing of Personal Information with our Payment Provider and Allocation Recipients. While we attempt to facilitate access only to those Payment Provider(s) and Allocation Recipients that share our respect for your privacy, we cannot and do not take responsibility for the content or privacy policies of those Payment Provider(s) and Allocation Recipients, and encourage you to carefully review their privacy policies.

**Information Shared with Our Agents:** We employ and contract with people and other entities that perform certain tasks on our behalf and who are under our control (our "Agents"). We may need to share Personal Information with our Agents in order to provide products or services to you. Unless we tell you differently, our Agents do not have any right to use Personal Information or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of Personal Information with our Agents.

**Information Disclosed Pursuant to Business Transfers:** In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

**Information Disclosed for Our Protection and the Protection of Others:** We also reserve the right to access, read, preserve, and disclose any information as we reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request; (ii) enforce this Privacy Policy and our Terms of Service, including investigation of potential violations hereof; (iii) detect, prevent, or otherwise address fraud, security or technical issues; (iv) respond to user support requests or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organisations for fraud protection and spam/malware prevention.

**Information We Share With Your Consent:** Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and will be able to prevent the sharing of this information.

### **Is Information About Me Secure?**

Your Account information will be protected by a password for your privacy and security. You need to prevent unauthorised access to your Account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer and browser by signing off after you have finished accessing your Account.

We seek to protect Account information to ensure that it is kept private; however, we cannot guarantee the security of any Account information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

We otherwise store all of our information, including your IP address information, using industry-standard techniques. We do not guarantee or warrant that such techniques will prevent unauthorized access to information about you that we store, Personal Information or otherwise.

### **What Information of Mine Can I Access?**

If you are a registered user, You may request details of personal information which we hold about under The General Data Protection Regulation (GDPR) will apply in the UK from 25 May 2018. It will replace the 1998 Act and introduce new rules on processing and safeguarding personal data. If you would like a copy of the information held on you please write to Metropolitan Place, Hobson Street, Oldham, OL1 1AN.

Attention: LEGAL

### **How Can I Delete My Account?**

Should you ever decide to delete your Account, you may do so by accessing your Profile within the Energitoken App or by emailing support@Energitoken.com. If you delete your Account, any association between your Account and information we store will no longer be accessible through your Account.

## **What Choices Do I Have Regarding My Information?**

- You can always opt not to disclose certain information to us, even though it may be needed to take advantage of some of our features.
- You can delete your Account. Please note that we will need to verify that you have the authority to delete the Account, and activity generated prior to deletion will remain stored by us and may be publicly accessible.
- You can delete your Account. Please note that we will need to verify that you have the authority to delete the Account, and activity generated prior to deletion will remain stored by us and may be publicly accessible.
- You can choose to opt out of certain communications or communication methods; however, if you do so, you may not be able to take advantage of some of our Services' best features.

## **What Happens When There Are Changes to this Privacy Policy?**

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we collect or use information, we will notify you by posting an announcement on the Services or sending you an email. You may be required to click "accept" or "agree" to show your consent to these additional terms and conditions. A user is bound by any changes to the Privacy Policy when he or she uses the Applications or Services after such changes have been first posted.

## **What If I Have Questions or Concerns?**

If you have any questions or concerns regarding privacy using the Services, please send us a detailed message to [contact@energimine.com](mailto:contact@energimine.com). We will make every effort to resolve your concerns.

**Effective Date:** May 10, 2018