

PRIVACY POLICY

This Policy is prepared in accordance with the Applicable laws and is designed to assist you with understanding how QWIN processes information that can be used to directly or indirectly identify an individual collected through registration to and use of the Website or Services.

1. DEFINITIONS

- 1.1. **Account** – online account created by the User at the Website.
- 1.2. **Applicable laws** – General Data Protection Regulation 2016/679 on the protection of natural persons with regard to the Processing of personal data and on the free movement of such data and other applicable laws in relation to protection of personal data.
- 1.3. **Blockchain** – a distributed immutable database that maintains a continuously-growing list of records called blocks in an open ledger, providing a transparent and reliable basis for automated contracting and payments resulting from real-time commercial activity.
- 1.4. **Consent** – any freely given, specific, informed and unambiguous indication of the User's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal data relating to him or her.
- 1.5. **Personal data** – any information directly or indirectly related to the User.
- 1.6. **Policy** – this privacy policy.
- 1.7. **Processing** – any operation or set of operations which is performed on Personal data or on sets of Personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.8. **Profiling** – any form of automated processing of Personal data consisting of the use of Personal data to evaluate certain personal aspects relating to the User, in particular to analyse or predict aspects concerning User's performance at economic situation, personal preferences or behaviour.
- 1.9. **QWIN, we, our or us** – QWIN token seller and provider of various technology services under the brand name "QWIN".
- 1.10. **QWIN token** – a virtual currency created and issued by QWIN.
- 1.11. **Services** – any services provided by QWIN and (or) its affiliates related to the Token Sale and (or) usage of QWIN tokens and (or) the Website, including the services available to registered Users on the Website.
- 1.12. **Token Sale** – a restricted pre-sale (pre-ICO), initial coin offering (ICO) or other sale of QWIN tokens organized by QWIN to eligible Users.
- 1.13. **User, you or your** – any natural person who uses, has used or has expressed a wish to use or is in other way related to the Website and (or) Services.
- 1.14. **Virtual currency** – a digital representation of value that is neither issued by a central bank or a public authority, nor necessarily attached to a fiat currency, but is accepted by natural or legal persons as a means of payment and can be transferred, stored or traded electronically. The definition of virtual currency includes all types of cryptocurrencies and tokens.
- 1.15. **Wallet** – any type of digital wallet used for storage of virtual currencies.
- 1.16. **Website** – official website of QWIN: Qwinworld.io and Qwin.world.

2. GENERAL PROVISIONS

- 2.1. The Policy applies if the User uses, has used or has expressed an intention to use or is in other way

related to the Website and (or) Services, including to the relationship with the User established before the Policy entered into force.

- 2.2. When you visit the Website, you may provide us with two types of information: Personal data that you voluntarily disclose that is collected on an individual basis, and Personal data collected automatically when you use the Website or Services.
- 2.3. QWIN shall process all Personal data in accordance with the general data processing principles:
 - 2.3.1. process Personal data lawfully, fairly and in a transparent manner;
 - 2.3.2. process Personal data only for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - 2.3.3. ensure that Personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - 2.3.4. ensure that Personal data is accurate and, where necessary, kept up to date;
 - 2.3.5. ensure that Personal data is kept in a form which permits identification of Users for no longer than is necessary for the purposes for which the personal data are processed;
 - 2.3.6. process Personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- 2.4. All information is stored securely and is accessed by authorized personnel only. QWIN implements and maintains appropriate technical, security and organisational measures to protect your Personal data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

3. PERSONAL DATA TO BE COLLECTED

- 3.1. Personal data may be collected from you while using the Website or Services. QWIN collects various types of your Personal data.
- 3.2. Your Personal data is collected and used during three main stages: registration, identity verification and the use of the Website and Services.
- 3.3. By providing us with your Personal data, you also provide consent for us to collect, hold, use and disclose your Personal data in accordance with the Policy. In addition to providing the foregoing information, if you choose to correspond further with us through e-mail or through the “contact” section of the Website, we may retain, use and disclose the content of your messages together with your e-mail address and our responses.

4. PROCESSING OF USER REGISTRATION DATA

- 4.1. During your sign-up and registration on the Website, you provide us with your Personal data such as: name, surname, email address, mobile phone number or social media profile. Provision of this Personal data is compulsory and mandatory for your Account to be activated. Failing to provide any of this data or decision to delete or object to processing of any of such data will result in de-activation of your Account.
- 4.2. You may sign-up on the Website by either filling in the sign-up form or by signing-in via the chosen social media profile. In the latter case we will collect the required identification data from the respective social media platform.
- 4.3. This personal identification information is processed by QWIN for the purposes of User identification as well as Account activation. Additionally, this information may be used to provide Users with support, letting them know about upcoming changes or improvements, providing information regarding changes of any terms or conditions (including changes to the Policy) as well as other important information.
- 4.4. QWIN processes User registration data on the legal basis of:
 - 4.4.1. Your consent, expressed when voluntarily submitting and filling your Personal Data details in our registration form;
 - 4.4.2. Conclusion and performance of contractual arrangements and obligations between QWIN and the User;
 - 4.4.3. Pursuance of legitimate interests of QWIN, as controller and manager of the Website. You may at any time access and edit, update or delete your contact details by logging into your Account

with your username and password.

5. PROCESSING OF USER VERIFICATION DATA

- 5.1. In order to have full access to all features of the Website, Services and participate in the Token Sale, you must verify your identity. For this purpose, we collect and use information required to identify the User in the future (name, surname, date of birth, address, ID document No.).
- 5.2. In addition, for verification purposes we also rely on verification services, managed and provided to us by a third party (that will be disclosed in the future). While exercising this verification step, you will be requested to upload your ID document and undergo facial verification, or, alternatively, film yourself with some tasks for the proof that you are a real human. No biometric data will be processed for this purpose.
- 5.3. As such, we do not carry out verification process ourselves and do not collect, store or otherwise process any scanned copies of ID documents or Users' facial scans. For the above purposes we receive and rely on a certain confirmation from the third party (performing the verification procedures) that your identity is verified.
- 5.4. QWIN may request to provide further information that will allow QWIN to reasonably identify you. QWIN reserves the right to contact User and request to provide more information or approve that provided information is up-to-date and valid.
- 5.5. Processing of your ID document, facial, verification data, uploaded to a third-party database as described above, is covered by third parties' privacy policies. You should carefully review and consult on these privacy policies.
- 5.6. In case you object to collection of such additional data for verification purposes, you may change your preferences and withdraw your consent at any time you wish by following the instructions and change your options in the settings of the Account. However, please note that this may lead to de-activation of your Account.

6. DATA PROCESSED IN THE COURSE OF THE USAGE OF THE WEBSITE OR SERVICES

- 6.1. When you use the Website or Services, QWIN automatically collects information from your devices. QWIN collects the following information:
 - 6.1.1. *History and information on your activity.* We collect information about your activity related to using the Services (e.g. your participation in the games or prizes won);
 - 6.1.2. *Server log information.* We collect server log information when you use the Website, which may include (but is not limited to) your login details, the date and time of visits, the pages viewed, your IP address, time spent at the Website and the websites you visit just before and just after the Website;
 - 6.1.3. *Device information.* We collect information about the computer or mobile device you use to access the Website, including the hardware model, operating system and version, the web browser you use, and other device identifiers;
 - 6.1.4. *Telemetry information.* If you use any of our open source software, we may collect bandwidth upload and download speeds, the amount of free and used storage space on your device and other statistics about your device;
 - 6.1.5. *Usage information.* If you use the Website, we will collect metadata about the files you upload for storage and we will record instances in which you have used your private key to authenticate communications;
 - 6.1.6. *Information collected by cookies and other tracking technologies.* We and our service providers use various technologies to collect information when you interact with the Website, including cookies and web beacons. Cookies are small data files that are stored on your device when you visit a website, which enable us to collect information about your device identifiers, IP address, web browsers used to access the Website, pages or features viewed, time spent on pages and links clicked. Web beacons are graphic images that are placed on a website or in an e-mail that is used to monitor the behaviour of the user visiting the website or sending the e-mail.
 - 6.1.7. *History of claims or complaints made by the User.* We collect information about the details of your claims and complaints including further communication.
 - 6.1.8. *Wallet address.* We collect information about your Wallet address which you provide us with during the Token Sale or in the course of the use of the Website or Services.

7. PURPOSES AND BASIS OF PROCESSING OF PERSONAL DATA

- 7.1. QWIN processes Personal data for the purposes of:
- 7.1.1. providing you the Services you wish to receive;
 - 7.1.2. providing you with the information about the Services that you have requested;
 - 7.1.3. providing, maintaining, delivering or improving the Website or the products or Services provided via the Website;
 - 7.1.4. creating Accounts and User profiles;
 - 7.1.5. analyzing and tracking Personal data to determine the usefulness or popularity of certain content and to better understand the online activity of Users;
 - 7.1.6. answering your inquiry or responding to a communication from you;
 - 7.1.7. sending you technical notices, support or administrative notifications;
 - 7.1.8. communicating with you about news, products, services, events and other information about QWIN we think will be of interest to you;
 - 7.1.9. fulfilling QWIN's legal or regulatory requirements;
 - 7.1.10. carrying out any other purpose or reason for which the Personal data was collected.

8. SHARING OF PERSONAL DATA

- 8.1. QWIN will only share your Personal data in the following ways:
- 8.1.1. with your consent or at your instruction;
 - 8.1.2. with our current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with us or our offices internationally;
 - 8.1.3. certain information you may choose to share may be displayed publicly, such as your username and any content you post when you use interactive areas of the Website like our online forums;
 - 8.1.4. in connection with a merger or sale of our company assets, or if we do a financing or are involved in an acquisition or any other situation where Personal data may be disclosed or transferred as one of our business assets;
 - 8.1.5. in response to a request for information if we believe disclosure is in accordance with, or required by, any Applicable laws, regulations or due legal process;
 - 8.1.6. with third parties where aggregated Personal data cannot be reasonably used to identify you.
- 8.2. We may also disclose your Personal data if required to comply with legal acts and international agreements, for example, related to implementing the principles of "customer due diligence" and "know your customer", to fulfil market transparency requirements and reporting those to competent authorities, to prevent, discover, investigate and report potential money laundering, terrorist financing, if the User is subject to financial sanctions or is a politically exposed person, and in order to take steps at the request of the User prior to entering into an agreement or compliance with a legal obligation or QWIN's legitimate interest for a sound risk management and corporate governance.

9. RETENTION PERIOD

- 9.1. Your Personal data will be processed no longer than necessary while the retention period may be based on agreements with you, Applicable laws or legitimate interest of QWIN. This is a case-by-case determination that depends on things like the nature of the data, why it is collected and processed, and relevant legal or operational retention needs.
- 9.2. We will also store your usage data until such time when you withdraw your consent for us to do so. All other data as specified above will be retained for as long as is necessary for the purpose(s) for which we originally collected it.

10. YOUR RIGHTS

- 10.1. You are entitled to a following range of rights regarding the protection of your Personal data:
- 10.1.1. access your Personal data processed by QWIN;
 - 10.1.2. withdraw your consent to the use of your Personal data;
 - 10.1.3. demand the correction of your inaccurate Personal data;
 - 10.1.4. request termination of processing of your Personal data;
 - 10.1.5. request termination of disclosure or enabling access to your Personal data;
 - 10.1.6. transmit your Personal data to another data controller (where technically feasible);
 - 10.1.7. request deletion of your Personal data;
 - 10.1.8. other rights indicated in the Applicable laws.

- 10.2. You have a right to obtain from QWIN confirmation as to whether or not Personal data concerning you is being processed, and, where that is the case, access to the Personal data and the information of purposes of the processing, the categories of your Personal data concerned, etc.
- 10.3. As it is envisaged in the Applicable laws, the right to receive information and Personal data concerning you will be restricted if this may:
 - 10.3.1. damage rights and freedoms of other persons;
 - 10.3.2. endanger the protection of the confidentiality of filiation of a child;
 - 10.3.3. hinder the prevention of a criminal offence or apprehension of a criminal offender;
 - 10.3.4. complicate the ascertainment of the truth in a criminal proceeding.
- 10.4. Where the processing of your Personal data is based on your consent, you have a right to receive the Personal data concerning you, which you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit this data to another data controller.
- 10.5. Where you have provided consent, you may withdraw it at any time, without affecting the lawfulness of the processing that was carried out prior to withdrawing it. Whenever you withdraw consent, you acknowledge and accept that this may have a negative influence on the quality or inability of providing the Services.
- 10.6. You have a right to obtain from us a rectification of inaccurate Personal data concerning you.
- 10.7. When your Personal data is being processed based on your consent and if you have withdrawn it, you may require the erasure of your Personal data. Such right does not apply if Personal data requested to be erased is being processed also based on other legal grounds such as agreement or obligations based on Applicable laws or, if the data is put and stored on the Blockchain, where the erasure of such Personal data is not technically feasible.
- 10.8. Where Personal data is processed for the above purposes on the basis of QWIN's legitimate interests, you may object to such processing, including profiling for direct marketing purposes, at any time.
- 10.9. By using the Website and (or) Services, you hereby acknowledge and agree that when you put or store your Personal data on the Blockchain, due to its immutability, QWIN might not always, except when it is technically feasible, correct, transmit or erase your Personal data.
- 10.10. To exercise any of the rights mentioned in the Policy and (or) in the event of questions or comments relating to the use of Personal data you may always contact us at the contact details listed below.
- 10.11. QWIN undertakes to notify you of dissatisfaction of your request described hereof providing the reasons for such denial. All your requests are acted upon within 30 (thirty) days from receipt of such request.
- 10.12. You have a right to lodge a complaint with the data protection authority established in your jurisdiction.
- 10.13. Most web browsers are set to accept cookies as a default. You may wish to opt out by turning cookies off.
- 10.14. You may also opt out of receiving promotional communications from us at any time. If you opt out, we may still send you non-promotional communications, such as technical notices, support or administrative notifications or information about your Account (if you have one).
- 10.15. The Website may contain links to other third-party websites that may collect Personal data about you, including through cookies or other technologies. If you link to another website, you will leave the Website and the Policy will not apply to your use of and activity on those other websites. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any information that is submitted to or collected by these third parties.

11. VALIDITY AND AMENDMENTS OF THE POLICY

- 11.1. We may revise the Policy in our sole discretion from time to time. The most current version of the Policy will govern our practices for processing and profiling Personal data. We will provide notice of any modifications by posting a written notice on the Website or will send you an e-mail. Your continued use of the Website and (or) Services constitutes your agreement to be bound by any such changes to the Policy. If you do not agree with the Policy, please do not use the Website or Services.

12. ACCEPTANCE OF THE POLICY

- 12.1. We assume that all Users have carefully read this document and agree to its contents. If someone does not agree with the Policy, they should refrain from using the Website and Services. We reserve the right to change the Policy as necessity dictates. Continued use of the Website and (or) Services implies acceptance of the revised Policy. This Policy is an integral part of QWIN's Terms and Conditions published at the Website. We will ask for your consent before using Personal data for a purpose other than those set out in the Policy.

13. CONTACT DETAILS

The data controller responsible for your Personal data protection is QWIN:

UAB Triglavas

legal code 304425998

registered office at A. Goštauto g. 40, LT-03163 Vilnius

e-mail address: support@qwin.world