

# PRIVACY POLICY

This Privacy Policy tells you what to expect when ENCORES collects personal information. At ENCORES the privacy and security of our customers and website visitors are of paramount importance; ENCORES is committed to safeguarding the data that our website visitors and service users share with us.

## 1. Introduction

ENCORES provides a platform that enables internet browsing to be rewarded. This privacy policy explains how ENCORES processes information that can be used to directly or indirectly identify an individual (“Personal Data”) collected through the use of its website and platform.

Any information stored on ENCORES platform is treated as confidential. All information is stored securely and is accessed by authorized personnel only. ENCORES implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

We will also ask you to agree to our use of cookies in accordance with the Cookies Policy of when you first visit our website.

Our website incorporates strict privacy controls which will have an impact on how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.

For the purposes of this Policy, ENCORES defines the term “User”, “Visitor”, “Client” or “You” as a natural or legal person, either a visitor of [www.encores.io](http://www.encores.io) and [www.encorestoken.uk](http://www.encorestoken.uk) website or as a user with an account at ENCORES. The term “we”, “us”, “our” refers to ENCORES.

## 2. Collection and use of information

### 2.1 .General

The following sections cover the specifics of each of the three groups from which data is collected: website Visitors and Users of our Services.

## **2.2 Website Visitors and collection of Visitors Data**

If you are a Visitor to our website only, and not a User of our Services or the ENCORES platform otherwise, then this section is relevant for you.

By visiting this website, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, we ask you to not visit this website [www.encores.io](http://www.encores.io) and [www.encorestoken.uk](http://www.encorestoken.uk) . In cases when required by applicable law, we will ask for your explicit consent to process Personal Data, which shall be collected on this website or volunteered by you. Kindly note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible.

ENCORES may collect, record and analyze information of Visitors to its website.

The usage data may include your IP address and use cookies, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services and improving users' experience, performance and future development of the service. The legal basis for this processing is our legitimate interest for monitoring and improving our website and services.

ENCORES may add information collected by way of page view activity. Furthermore, ENCORES may collect and process Personal Data that you voluntarily (with your consent) give to ENCORES in our website's forms, such as when you sign up for information and newsletters. If you provide ENCORES with your social media details, ENCORES may retrieve publicly available information about you from social media.

Such Personal Data may comprise your IP address, first and last name, your postal and email address, your telephone number, your job title, data for social networks, your areas of interest, interest in ENCORES products, and certain information about the company you are working for (company name and address), as well as information as to the type of relationship that exists between ENCORES and yourself.

ENCORES gathers data about visits to the website, including numbers of Visitors and visits, Geo-location data, length of time spent on the site, pages clicked on or where Visitors came from.

#### *2.2.1 PURPOSE OF PROCESSING PERSONAL DATA*

ENCORES uses the collected data to communicate with Visitors, to customize content for Visitors, to show ads on other websites to Visitors, and to improve its website by analyzing how Visitors navigate its website. ENCORES will process all Data in order to monitor and improve website and Services.

#### *2.2.2 SHARING AND STORING PERSONAL DATA*

ENCORES may also share such information with service vendors or contractors in order to provide a requested service or transaction or in order to analyze the Visitor behavior on its website.

The data that we collect from you is stored within the territories of the European Union.

#### *2.2.3 COOKIES*

Cookies are files (small pieces of data) sent by web servers to web browsers that are downloaded to users' hard disk, serving to improve their experience and are. Cookies cannot be used to run programs or deliver viruses to your computer. By continuing to visit this website, you agree to the placement of cookies on your device. If you choose not to accept our cookies, we cannot guarantee that your experience will be as fulfilling as it would otherwise be. We may also place cookies from third parties for functional and marketing purposes. The use of cookies is widespread and benefits the surfer. For further information, see ENCORES Cookie Policy.

#### *2.2.4 LINKS TO OTHER WEBSITES*

Our website may contain links to other websites, such as (but not limited to) Facebook, Slack, LinkedIn, Github, Twitter, and other third party websites. If you click on such a link, you will be directed to that site. Note, that these external sites are not operated by ENCORES. We strongly advise you to review the Privacy Policy of the third-party websites that you visit. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

### *2.2.5. GEOGRAPHICAL LOCATION OF COLLECTION AND STORING PERSONAL DATA*

The website ENCORES runs on servers in European data regions. ENCORES “Data Region” is a set of data centers located within a defined geographical area where User data is stored. Personal Data is not transmitted to another Data Regions. For ENCORES website visitors, all Personal Data of visitors are located in ENCORES European Data Region, all Personal Data is processed in the EEA.

## **2.3 Users**

### *2.3.1 GENERAL*

In order to provide services to its Users, ENCORES collects certain types of data from them. This section will describe how Users` data are collected and used by ENCORES. Data entered or transferred into ENCORES by Users such as texts, questions, contacts, media files, etc. remain the property of the User and may not be shared with a third party by ENCORES without express consent from the User.

ENCORES will process your account data you provide when you open ENCORES account, buy products or tokens or use other ENCORES Services. This information may include:

- Contact information, such as name, home address, email address, date and place of birth, mobile phone number.
- Account information, such as username and password.
- Financial information, such as bank account numbers, bank statements, and trading information.
- Identity verification information, such as image of your government issued ID (passport, national ID card)
- Residence verification information, such as utility bill details, phone bill or similar document.

The source of the account data is user who opens an account. The account opening data will be used and processed for the purposes of performing a detailed Know Your Customer (Hereinafter: KYC) procedure according to necessary Anti-Money Laundering and Anti-Terrorist regulations.

Users are visitors of the ENCORES website and therefore their Personal Information are collected as described in the previous section. These Personal Information will be used for operating our website, providing our services, ensuring the security of our

website and services, maintaining back-ups of our databases and communicating with Users.

### *2.3.2 COLLECTION OF USER DATA*

During a User's registration at ENCORES platform, Users provide information such as name, company name, email, address and nationality (registered seat of the legal entity), bank account, ID number and image of the ID document, date and place of birth, personal picture, phone number, utility bill and other relevant data.

The Users Data shall be collected and processed by a third party processor, who is a trusted partner of ENCORES for collecting and processing Users data on behalf of ENCORES. The processor is an experienced identity verification company that will process Personal Data for the purposes of the necessary KYC/AML procedures. The processor will obtain and process all the above stated Personal Data and run KYC/AML procedures and ensure compliance with the relevant AML legislation.

For the purposes of maintaining users' accounts and reviewing users for the purposes of KYC/AML compliance, ENCORES will collect and process the same that the Processor will collect in the process of User verification (KYC) procedure. ENCORES will use some of those information also for personalizing Service experience, analyzing ENCORES website usage, improve website offerings, help to respond to customers' requests and support needs, contact you about new Services, modification of the Terms, Privacy Policy or Cookies Policy, communicate company news, updates, promotions and related information regarding the company, products or services, administering a contest, surveys, promotions and other site features.

If you wish to stop receiving marketing communications from us, please contact us at [support@encorestoken.uk](mailto:support@encorestoken.uk) to opt-out or go to one of our previous emails and unsubscribe.

Users of ENCORES services can at any time access and edit, update or delete their contact details by logging in with their username and password to ENCORES platform and use "Delete User Account" setting. ENCORES will not retain User data longer than is necessary to fulfill the purposes for which it was collected or as required by the applicable laws and regulations.

### *2.3.3. GEOGRAPHICAL LOCATION OF PROCESSING PERSONAL DATA*

All Personal Data, which will be collected and processed within KYC procedure by the Processor and ENCORES are stored on servers in European data regions. Such Personal Data is not transmitted to another Data Regions.

ENCORES has servers in European data regions. ENCORES “Data Region” is a set of data centers located within a defined geographical area where User data is stored. Personal Data is not transmitted to another Data Regions. For ENCORES Users, all accounts are located in ENCORES European Data Region, all Personal Data is processed in the EEA.

It has to be noted that ENCORES is can be operating on the blockchains, which are decentralized databases software platforms for virtual assets. Blockchains are a list of records, called blocks, which are linked and secured using cryptography. Each block typically contains a cryptographic hash of the previous block, a timestamp and transaction data. By design, a blockchain is inherently resistant to modification of the data. Therefore Data cannot be modified or deleted, since there are no servers involved. Data are dispersed among computer all around the world in encrypted version.

All the above means that your Personal Data may be collected, stored, processed and that you will not be able to delete it or invoke the right to be forgotten. Your data is encrypted, meaning they are coded (anonymized). Note that also encrypted personal data may still be traced back to a person if enough effort is put into it by experts or someone holds the key to decryption. With using ENC token, and ENCORES services, you expressly agree to may give your Personal Data on the (public) blockchain that these Data (even though encrypted) cannot be deleted and that Personal Data may be transferred outside European territory.

#### *2.3.3.1 PROCESSING IN ACCORDANCE WITH GENERAL DATA PROTECTION REGULATION*

The processing of Personal Data is performed in accordance with privacy rights and regulations following the EU Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 (the Directive), and the implementation of the Directive in local legislation. From May 25th, 2018, the Directive and local legislation based on the Directive will be replaced by the Regulations (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, known as the

General Data Protection Regulation (GDPR), and our processing will take place in accordance with the GDPR.

### **2.3.3.2 CONTROLLER**

ENCORES processes Personal Data both as a Processor and as a Controller, as defined in the Directive and the GDPR:

ENCORES, which you as a Visitor entered an agreement with when using ENCORES platform as a Visitor, will be the Controller for Visitors data, as outlined above in “Collection of Visitor data” section.

For Users data, as outlined in the “Collection of Users data” section, the ENCORES will be the Controller in accordance with GDPR. The Users Data shall be processed by a third party Processor, to Collect and process Users data on behalf of ENCORES. The Processor is an experienced identity verification company that will process Personal Data for the purposes of the necessary KYC/AML procedures. The Processor will obtain and process users: name, surname, address, residency, date and place of birth, ID number, copy ID, users’ picture, email, phone number, utility bill and other personal information. The Processor is having sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of GDPR and ensure the protection of the rights of the data subject.

ENCORES has a data processing agreements in place with its providers, ensuring compliance with all the relevant regulations, including GDPR. All hosting is performed in accordance with the highest security regulations. All transfers of data internally is done in accordance with this data processing agreement.

## **4. Retention and deletion of Personal Information**

ENCORES will not retain data longer than is necessary to fulfill the purposes for which it was obtained for or as required by applicable laws or regulations. When a users’ account is terminated or expired, all Personal Data collected through the platform will be deleted, as required by applicable law.

Every user or visitor can invoke the right be right to be forgotten at any time. Users and visitors can request a list of his or her personal data. In case you wish to obtain such data send an e-mail to [support@encorestoken.uk](mailto:support@encorestoken.uk) . You will receive the list within one month from receiving your request by ENCORES.

## **5. Acceptance of these Conditions**

We assume that all Visitors of our website and users of ENCORES platform have carefully read this document and agree to its contents. If someone does not agree with this Privacy Policy, they should refrain from using our website and platform. We reserve the right to change this Policy as necessity dictates or with the change of our Services. Continued use of ENCORES website and platform after having been informed of any such changes to these conditions implies acceptance of the revised Privacy Policy. This privacy policy is an integral part of the Terms of Service for ENCORES Services and Website.

## **6. Legal Obligation to Disclose Personal Information**

### **6.1. Disclosure to third parties**

In processing your transactions, we may share some of your Personal Information with third party service providers who help with our business operations. Your information will not be sold, exchanged, or shared with any third parties without your consent, except to provide ENCORES Services or as required by law. By using our Services and accepting our Terms of Service, you consent to the disclosure of your Personal Information as described in this Privacy Policy.

### **6.2. Disclosure to prevent damage and disclosure to legal authorities**

We will reveal the user's personal information without his/her prior permission only when we have reason to believe that the disclosure of this information is required to establish the identity of, to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to ENCORES or to others who could be harmed by the user's activities or of persons who could (deliberately or otherwise) transgress upon these rights and property. We are permitted to disclose personal information when we have good reason to believe that this is legally required and when the competent authorities have required to present them with such Personal Information.

## **7. Security of Personal Information**

We use a variety of security measures to ensure the confidentiality, integrity, availability and privacy of your Personal Information and to protect your Personal Information from loss, theft, unauthorised access, misuse, alteration or destruction. These security measures may include, among others:

- Password protected directories and databases.
- Secure Sockets Layered (SSL) technology to ensure that your information is fully encrypted and sent across the Internet securely.
- Vulnerability Scanning to actively protect our servers from hackers and other vulnerabilities.
- Secure coding principles.
- Logging off activities performed in the platform.
- Access controls and
- other measures to mitigate risks identified during risk assessment process.

All financially sensitive and/or credit information is transmitted via SSL technology and encrypted in our database. Only authorised ENCORES personnel are permitted access to your Personal Information, and these personnel are required to treat the information as highly confidential. The security measures will be reviewed regularly in light of new and relevant legal and technical developments.

## **8. Access right to your personal information**

You have the right to access your Personal Information to correct, update, and block inaccurate and/or incorrect data. To exercise this right, contact us at [support@encorestoken.uk](mailto:support@encorestoken.uk) .

## **9. Information, Complaints and Contact**

If you have any further questions regarding the data ENCORES collects, or how we use it, then please feel free to contact us by email at: [support@encorestoken.uk](mailto:support@encorestoken.uk)

## **9. UPDATES of the privacy policy**

This Privacy Policy may be revised, modified, updated and/or supplemented at any time, without prior notice, at the sole discretion of [support@encorestoken.uk](mailto:support@encorestoken.uk) . When we make changes to this Privacy Policy, we will notify all users on our website, and make the amended Privacy Policy available on our website.

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