

JOLTEE PRIVACY POLICY

Last Updated: August. 23, 2019

In addition to this Privacy Policy, the use of the Website of JOLTEE (or hereinafter “us”) and/or the purchase of the JOLT Tokens requires the acceptance of the Buyer (hereinafter “you”) of:

- Terms of Use
- White Paper
- JOLT Token Purchase Agreement

These documents formalize a contractual relationship between you and JOLTEE serving, in particular, as a legal basis for the collection and processing of your Personal Data by JOLTEE under the conditions of this Privacy Policy.

By using our Website, you declare that you accept the terms of this Privacy Policy. JOLTEE makes every effort to best protect your privacy during your visits to the Website.

You can contact our Data Protection Officer at any time, whose contact details are provided below.

This section is devoted to our Privacy Policy. It allows you to learn more about the origin and use of information and Personal Data collected and processed by us during your consultation of our Website, or the purchase of the JOLT Tokens and to inform you about your rights, in particular your specific rights.

This Privacy Policy is therefore important for you, who wants to have a positive and confident experience of your participation of our ICO who wants to accurately and fully answer your questions about your consultation of our Website and the purchase of the JOLT Tokens, and take your wishes into account.

We may freely modify this Privacy Policy. Any changes will take effect immediately and will only apply to person using the Website after the change. Therefore, we invite you to refer to it on each visit to our Website, to read its latest version permanently available on the Website.

ARTICLE 1 – The protection of your Personal Data

1.1 What is the legal basis for the processing implemented

In accordance with the General Data Protection Regulation No. 2016/679 of April 27, 2016 (hereinafter “**GDPR**”) and the Swiss Data Protection Act (hereinafter “**Personal Data Regulations**”), the processing referred to in this Privacy Policy are supported by a specific legal basis.

JOLTEE GmbH with a capital of CHF 20.000 under n°CHE-244.132.932 in the commercial register of the Canton of Zürich and registered office address Haldenstrasse 126 – 8055 ZURICH – Switzerland, is responsible for the processing of your personal data (as a “data controller” pursuant to the GDPR).

1.2 What Personal Data is collected?

- Country
- First name
- Middle name
- Last name
- Date of birth

- Nationality
- Email address
- Contact number
- Address
- Phone number
- Scan of ID Document : passport, driving license, national identity card or resident permit card
- ETH Wallet
- BTC Wallet
- Cryptocurrency wallet

(hereinafter the “Personal Data”)

1.3 How long is your Personal Data kept by JOLTEE?

We will retain your Personal Data for as long as is necessary for the purpose for which it was collected. We will further retain your Personal Data to comply with legal and regulatory obligations, for as long as claims could be brought against us and for as long as legitimate interest, including data security, requires.

If you have elected to receive informational communications from us, we retain information about your preferences until you opt out of receiving these communications and in accordance with our policies.

To determine the appropriate retention period for your Personal Data, we will consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we use your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

1.4 For what purposes is your Personal Data?

Your Personal Data enumerated above is necessary to allow you access to our services, their use and their improvement, and is processed by us in order to:

- Perform operations relating to our relationship regarding the purchase of JOLT Tokens ;
- Manage requests for the exercise of the rights referred to the Article 2 below;
- Technical support;
- Fight against fraud.

1.5 Hosting your Personal Data?

The Personal Data collected and processed by JOLTEE is only stored on secure servers located in European Union. In order to operate certain services and features on the website, JOLTEE may be required to transit the Personal Data through its servers and/or those of its partners who may be located throughout the world , in which case we have taken appropriate steps to maintain an adequate level of data protection as required by the applicable Data Protection Regulations.

JOLTEE requires all its subcontractors and service providers to implement any necessary technical measure, on an ongoing basis, to keep Personal Data secure and ensure the same high level of protection of Personal Data as that required by the Personal Data Regulations.

Your information is also transferred to our service provider as necessary to conduct the AML/KYC and to our bank also located in Switzerland. Where we transfer your Personal Data out of the EU we will

take steps to ensure that your Personal Data receives an adequate level of protection where it is processed and your rights continue to be protected.

For your information, JOLTEE is based in Switzerland and we use a service provider to help us to conduct the compliance analysis (KYC, AML, PEP usw.) located in Switzerland. We are permitted to transfer your Personal Data to our servers and to our supplier in Switzerland because Switzerland is currently on the European Commission's list of countries found to provide adequate protection for the rights and freedoms of data subjects in connection with the processing of their Personal Data.

1.6 What information do we share with third parties?

JOLTEE may be required to temporarily and securely transfer to third parties, the Personal Data mentioned above which is necessary in particular for the operation, coordination and maintenance of our website, for purchasing the JOLT Tokens and also to fight against fraud and more generally any criminally reprehensible activity.

The following Personal Data will be forwarded, notably, to our service provider Swisscom (Schweiz) AG in order to conduct the compliance analysis (KYC, AML, PEP usw.).

Swisscom (Schweiz) AG will collect the following data:

- Voice record of the identification call;
- Picture of the contributor;
- Picture of the contributor's documents (passport, ID card).

All this data will be delivered to JOLTEE (JOLTEE will grant access to its Bank as well) and irreversible ("*unwiederruflich*") deleted at Swisscom (Schweiz) AG after ending over to JOLTEE. The Personal Data collected by Swisscom (Schweiz) AG are encrypted. All Personal Data remains in Switzerland and information transfer is over a secure server.

In any case, JOLTEE will never transmit your Personal Data to any third party likely to use it for its own purposes, and in particular for commercial and/or direct advertising purposes, without your express consent.

ARTICLE 2 – Your rights

2.1 What are your rights?

In accordance with the Personal Data Regulations, you have the following specific rights:

- access (Article 15 of the GDPR),
- rectification (Article 16 of the GDPR),
- erasure (Article 17 of the GDPR),
- limitation of processing (Article 18 of the GDPR),
- portability (Article 20 of the GDPR),
- opposition (Articles 21 and 22 of the GDPR),

2.1.1 Rights of access

You have the right to obtain from us a confirmation as to whether or not your Personal Data are being processed. Where that is the case, you can request access to the Personal Data and the following information:

- The purposes of the processing;
- The categories of Personal Data concerned;
- The recipients or categories of recipient to whom the Personal Data have been or will be disclosed;
- The envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;
- The existence of the right to request from JOLTEE rectification or erasure of your Personal Data or restriction of processing of your Personal Data or to object to such processing;
- The right to lodge a complaint with a supervisory authority.

Where Personal Data are transferred to a third country or to an international organization, you have the right to be informed of the appropriate safeguards pursuant to Article 46 of the GDPR relating to the transfer. You can obtain a copy of the appropriate or suitable safeguards, where applicable on demand to JOLTEE under the contact details set out under Article 6.

JOLTEE provides a copy of the Personal Data that is subject to processing.

JOLTEE may require the payment of reasonable fees based on the administrative costs for any additional copy requested by you.

2.1.2 Rights of rectification

You have a right to request us to rectify of inaccurate Personal Data concerning you without undue delay.

2.1.3 Rights of erasure

You have the possibility to obtain from JOLTEE the erasure, as soon as possible, of Personal Data concerning you when one of the following reasons applies:

- The Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed by JOLTEE;
- You have withdrawn your consent to the processing of such Personal Data and there is no other legal basis for the processing;
- You exercise your right to object under the conditions set out below and there is no compelling legitimate reason for the processing;
- The Personal Data has been unlawfully processed;
- The Personal Data must be erased to fulfil a legal obligation;
- The Personal Data was collected from a child.

2.1.4 Rights to limitation

You have the possibility to obtain from JOLTEE the limitation of the processing of your Personal Data when one of the following reasons applies:

- JOLTEE verifies the accuracy of the Personal Data following your challenge of the accuracy of the Personal Data;
- The processing is illegal and you oppose the erasure of the Personal Data and require instead the limitation of its use;
- JOLTEE no longer needs the Personal Data for the purposes of processing but it is still necessary for you to ascertain, exercise or defend legal rights;

- You have objected to the processing under the conditions described below and JOLTEE checks to see if the legitimate reasons pursued prevail over your alleged reasons.

2.1.5 Right of Data portability

You have the possibility to receive from JOLTEE the Personal Data concerning you, in a structured format, commonly used and readable by machine when:

- The Personal Data processing is based on consent, or on a contract and;
- The processing is performed using automated methods.

When exercising your right to portability you have the right to have the Personal Data sent directly by JOLTEE to a data controller you designate, when this is technically possible.

Your right to the portability of your Personal Data must not affect the rights and freedoms of others.

2.1.6 Right of opposition

You have the right to object at any time, for reasons relating to your particular situation, to a processing of your Personal Data based on the legitimate interest of JOLTEE. JOLTEE will no longer process the Personal Data unless it demonstrates that there are legitimate and compelling reasons for the processing that prevail over your interests and your rights and freedoms, or may retain it for the purpose of the ascertainment, exercise or defense of rights in court.

2.2 How can I exercise your specific rights?

To exercise your specific rights with JOLTEE, you can send your request:

- By email to our Data Protection Officer at contact@joltee.co
- By letter to our Data Protection Officer at the following address:

JOLTEE GmbH

Attention: Data Protection Officer
Haldenstrasse 126
8055 ZURICH
SWITZERLAND

You will receive a reply within a maximum period of one (1) month from the date of receipt of your request.

If necessary, this period may be extended by two months by JOLTEE which will notify you, depending on the complexity and/or number of requests.

In the event of a request to delete your Personal Data and/or if you exercise your right to request the deletion of your Personal Data, we may however retain it in the form of intermediate archiving, for the duration necessary to meet our legal, accounting and tax obligations and, in particular, to prevent any possible illegal behaviour after the deletion of your account (reuse of your old account by a third party).

You may, at any time, make a claim to the competent supervisory authority.

ARTICLE 4 – Security measures

JOLTEE implement effective means to ensure that your data is secure. This is why we use control measures that are technical, physical and procedural which are implemented at the time of collection, processing and transfer of your data.

To provide you with the necessary security while maintaining the usual browsing comfort, several mechanisms have been implemented.

Connection to our site is carried out via a secure connection using SSL (Secure Socket Layer) technology. Access can only be gained by entering your email address and password, which are personal to you.

Nevertheless, you must protect the password of your account and not communicate it to anyone. To do so, your password must consist of at least 8 characters and a special character, not be composed of the surname, first name or an email address used for your registration. After four unsuccessful attempts, the account will be blocked.

Your password and the links to our site sent in our emails are for your sole attention, and are confidential.

Indeed, although JOLTEE infrastructures are protected from malicious software called "malware" (viruses, trojans, worms, spyware, etc.), the security of your terminal and your network remains your responsibility. We recommend that you have an up to date anti-virus on your terminal, do not let anyone access your wired or wireless home network or WIFI and check that your communications with the Internet are legitimate. You can also install a firewall on your computer.

ARTICLE 5 – Cookies

We use "cookies" in order to facilitate navigation throughout our website. A cookie is a small data file stored on your computer.

A cookie may be used in order to enable you access to site functionalities like connexion, display and content search but may also be used for social sharing and website statistics.

A cookie file cannot identify you personally. If you do not want to accept cookies, you can configure your web browser in order to block them. Most of web browsers enable cookie blocking.

ARTICLE 6 – Contact

All questions relating to data and your privacy are welcomed and should be addressed to our support team. If you have any questions, comments or requests regarding this privacy policy then please, contact our Data Protection Officer via contact@joltee.co.