

OnLife
TOKEN SALE PRIVACY POLICY
Last updated: 01.12.2018

STATUS AND ACCEPTANCE OF PRIVACY POLICY

1. This Privacy Policy (hereinafter referred to as the “Policy”) sets forth the general rules of “Personally Identifiable Information”(hereinafter the “PII”) is being used online including its processing, distribution, use and keeping by the Onlife Management OÜ, a company established and existing under the laws of Estonia, having its business address at Onlife Management OÜ (hereinafter the “OnLife”, “Company”, “Us”, “We”). The proper handling of personal data is extremely important to us. We therefore take your privacy seriously when processing and protecting your personal data. This is done in accordance with provisions set out in the applicable privacy laws (including the General Data Protection Regulation).
2. Throughout this Policy, OnLife use the term “Personal Data” to describe PII information that can be associated with a specific person (hereinafter the User) and can be used to identify that person (including the information about the User’s activities, such as information about Your use of the Website, when directly linked to personally identifiable information, including automatically collected). OnLife does not consider Personal Data to include information that has been anonymized so that it does not identify a specific User.
3. It is understood and presumed that by the fact of the Website use, purchase of ONLC Tokens, or by providing OnLife the Personal Data directly on its request, the User has fully read, understood and accepted this Policy. If any User does not agree with this Policy in general or any part of it, such User should withhold from using the Website and/or purchase of ONLC Tokens.

COLLECTION, PROCESSING AND USE OF PERSONAL DATA

4. The main purpose of Personal Data collection, storage and processing of Personal Data within the OnLife project shall be the identification of the ONLC Token Purchaser during the OnLife Token Sale. We may also use the information we collect from you when you register, make a purchase on the Website, sign up for our news letter, respond to a surveyor marketing communication, surf the website, or use certain other site features in the following ways:

- (1) To improve our website in order to better serve You;
- (2) To allow us to better service you in responding to customer service;
- (3) To administer a contest, promotion, survey or other site feature;
- (4) To quickly process your transactions;
- (5) To send periodic emails regarding the Website and to follow up with them after correspondence (live chat, email or phone).

5. OnLife also use cookies to collect Personal Data from running the Website and use of Personal Data, provided to OnLife by You.

What are Cookies?

A "cookie" is a piece of data that a web server creates when you visit a web site. This data is information about how and when you use a site. It is placed on your computer, smartphone, smart TV or tablet ("online device") in the form of a small text file. The information cannot be used to identify you personally. Cookies do not collect personal information such as your name, address, telephone number, or email address.

There are two main types of cookies:

Session cookies: these are temporary cookies that expire when you leave the site. Session cookies allow the website to recognize you as you navigate between pages during a single browser session and allow you to use the website most efficiently. For example, session cookies enable a website to remember that a user has placed items in an online basket.

Persistent cookies: in contrast to session cookies, persistent cookies are stored on your online device between browsing sessions until expiry or deletion. They therefore enable the website to "recognize" you on your return, remember your preferences, and tailor services to you.

We use both session cookies and persistent cookies on our website. The benefit of enabling cookies is that it will allow your use of OnLife's website(s) to be faster, easier and tailored to your interests.

Why we use Cookies

Many cookies are designed to give you optimal usage of the web. For example, we use cookies to collect information about your activity on our websites to enable us to improve your user experience when using our websites, e.g. a cookie which recognizes if your browser supports specific technology features. This helps, for example, in enabling web pages to be loaded more quickly when you request the download of a large file. The information that we collect and share is not personally identifiable. It does not include your name, address, telephone number or email address.

We use cookies on this website for the following purposes:

To collect statistical information: We use cookies to collect statistical information on how you use our websites for statistical and evaluation purposes to help us understand how users use the website and help us improve the structure of our website.

Engagement: We use cookies to collect non-identifiable information to gain a better understanding of customer behaviours on our website(s) to develop engagement strategies to better serve you. This data may be matched with internal customer information to provide you with services that better reflect your needs.

Authenticating your computer: We use cookies to gather information such as IP Address and Browser type to authenticate you and your computer.

Security and verification: To help us maintain security and verify your details whilst you use the website as you navigate from page to page, which enables you to avoid having to re-enter your details each time you enter a new page.

Personalized Content: To remember how you have customized your use of this site, such as your preferred currency and time zone.

Use of Third Parties: We may use third party providers, such as Google Analytics, to help collect and compile information like the number of visitors to our site, where visitors have come to the site from and the pages they visit. Our third party providers may also use cookies to deliver advertisements that are more relevant to you and your interests and to help measure the effectiveness of an advertising campaign.

These third parties may collect your IP address or device identifier on the date you visit a site, but not your name or other identifying information. We do not combine information collected through the use of these third party providers with other personal information we may have about you.

Third party providers have their own cookie and privacy policies.

(1) Opting-Out

As part of our commitment to fair information practices, OnLife allow you to opt out of the use of information about your activities on other websites to provide you with Interest-based advertising.

You can opt out of Google Analytics by installing Google's opt-out browser add-on, and out of interest-based Google ads using Google's Ads Settings.

Even if you optout, you may still receive OnLife advertising. It just means that the advertising you see will not be customised for you.

(2) Refusing Cookies

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place. You can limit the collection of your information by disabling cookies on your browser. You may also be able to modify your browser settings to require your permission each time a site attempts to set a cookie.

However, our website(s) (and many other websites) rely on cookies to enable certain functionality. If you choose to disable cookies, some of the services available on our website may not work properly.

(3) External Websites and Links

Our websites may contain links to external websites. We are not responsible for the practices of those third party websites. Where you access other websites from our sites using the links provided, the operators of these websites may use cookies in accordance with their own cookies policy, which may differ from ours. You should read their privacy and cookie policies carefully before you provide any personal information to them.

(4) Caution regarding automatic Cookie Functionality

Browsers such as Microsoft Internet Explorer allow you to store passwords and logon IDs so you do not need to re-enter this information each time you access a web site. OnLife strongly urges you NOT to use this functionality to prevent unauthorized use of your online banking access code(s). This Personal Data includes:

- (1) Your IP address;
- (2) Device information including, but not limited to, identifier, name, and type, operating system;
- (3) Mobile network information;
- (4) Standard web log information, such as Your browser type, and the pages You accessed on OnLife Website.

When the User use a location-enabled device with OnLife Website and products, OnLife may collect geographical location data or use various means to determine the location, such as sensor data from the User's device that may, for instance, provide data on nearby cell towers and Wi-Fi access spots. However, OnLife will not release

Your personal identifying information of such kind to any third party without Your consent, except as set forth herein.

6. If the User want to purchase ONLC Tokens, OnLife collect and store the following types of Personal Data about You / Company You represent:
Your full name / Full company name, the names of the director, members of the management board or other body replacing the management board, and their authorization in representing the legal person;
Date of birth / Registration number and date;
Your address, place of residence; / Registered address;
Your email and contact phone number / Mobile telephone number and e-mail of the company.

7. OnLife may require You to provide additional information under KYC Procedure including:
a. Passport or driver license details;
b. Numbers that You may use or have registered with Your local tax authority;
c. Utility bills;
d. Your photo;
e. Confirmation of proceeds sources;
f. Sworn statements;
j. Documents that confirming the status of an accredited investor in accordance with the law of the US and / or the European Union and/or United Arab Emirates and/or Hong Kong and/or Singapore.

8. OnLife also reserve the right to request the User for remote identification procedure and to use third party services for such identification.

9. OnLife reserve OnLife right to request basic Personal Data, described in clause 7, prior to purchase of ONLC Tokens and/or use of any services, available through the Website. OnLife may refuse the User access to the Website in case if OnLife have grounded doubts as to validity, authenticity and genuineness of the Personal Data, provided by the User.

10. If the User does not provide OnLife with the Personal Data as specified in clauses 6,7 hereof, the User shall not be able to use the full functionality of the Website and purchase of ONLC Tokens and/or use the OnLife platform. At that, OnLife shall not bear any liability for such possible incomplete use.
11. OnLife is the only data controller and processor, except for the cases when there is an objective OnLife need to control/process or store Personal Data at OnLife's counterparties or agents. Should such counterparty or agent be engaged by the OnLife, OnLife shall notify You in advance.
12. You may access, review and edit Your Personal Data at any time by communicating OnLife in writing.
13. The User has the right to require OnLife to delete User's Personal Data provided by the User to OnLife or revoke his (or her) consent for collection, processing and storage of his (or her) personal data by OnLife at any time. If You decide to do this, You should send the respective notification to the OnLife. OnLife shall delete Your respective Personal Data from any sources within 24 hours from the moment OnLife receive such request from You. At that, the OnLife reserves its right to suspend provision of any services to You referring to OnLife project and/or delete Your Account on the Website without prior notice, not providing any compensations to You.
14. OnLife will not publish any Personal Data related to Your purchase of ONLC Tokens without Your prior written consent.

PERSONAL DATA PROTECTION AND SHARING

15. OnLife will do any and all efforts and actions prescribed by Applicable Law to store any of Your personal data in secrecy.
16. OnLife store and process Your Personal Data on OnLife servers in various jurisdictions, where our facilities and/or OnLife service providers are located. By submitting Your Personal Data, You agree to this transfer, storing, or processing. OnLife will take all steps reasonably necessary to

ensure that Your Personal Data is treated securely and in accordance with this Policy. OnLife protect Your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards OnLife use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. OnLife also authorize access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent than in Your country. From time to time, the Personal Data may be also stored in other locations, and in such cases, OnLife will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

17. OnLife is sometimes required to compare the Personal Data You provide to third party databases in order to verify its accuracy and confirm Your identity. This allows OnLife to comply with relevant anti-money laundering (AML) regulations and “know your customer” (KYC) regulations.
18. OnLife will not share Your Personal Data with any third parties other than OnLife respective identity verification partners. OnLife reserve our right to share Your Personal Data with:
 - a. OnLife banking and brokerage partners;
 - b. Companies that OnLife plan to merge with or be acquired by (should such a combination occur, OnLife will notify You and will require that the newly combined entity follow these terms with respect to Your Personal Data);
 - c. Third party identification service providers for fraud prevention purposes;
 - d. Law enforcement, government officials, or other third parties when OnLife are compelled to do so by a subpoena, court order, or similar legal procedure; or OnLife believe in good faith that the disclosure of Personal Data is necessary to prevent

physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of OnLife policies;

e. OnLife Personal Data processing counterparties or agents, hired by or cooperating with us, who's services are required by us from the practical point of view;

f. Other third parties only with Your prior consent or direction to do so.

19. OnLife will not provide Your Personal Data to any other Web site users or third parties other than described in clause 18 herein without Your consent or direction.

20. OnLife will not sell or rent Your Personal Data to third parties.

21. OnLife may combine Your Personal Data with information OnLife collect from other companies and use it to improve and personalize the Website and our products, as well as our content and advertising.

22. OnLife may use Your name and email address to provide You with information about products or services that may be of interest to You, but OnLife will not use Your Personal Data without complying with applicable laws and, where appropriate, obtaining your consent.

23. OnLife services may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If You follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that OnLife do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location data. Please check these policies before You submit any personal data to these websites or use these services.

RETAIN INFORMATION

24. In accordance with Applicable Law and as needed to provide services to OnLife Users, OnLife may hold Your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. OnLife may retain Your Personal Data for as long as You possess ONLC Tokens and/or use the Website. Moreover, Your Personal Data may be hold beyond the abovementioned period till it is indispensable for OnLife to have relevant information to respond to any issues that may arise later.

SECURITY

25. OnLife use relevant electronic and procedural safeguards to protect the privacy of the information the User provide to OnLife from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Please note that OnLife are not liable for the security of any data Users are transmitting over the Internet, or third party content.

CHANGE/UPDATE/DELETE PERSONAL DATA

26. You have a right to demand OnLife to provide You access to Your Personal Data and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting OnLife. Nevertheless, this request must comply with OnLife ONLC Tokens Sale Agreement and OnLife legal obligations.

AMENDMENTS

27. We may revise this Privacy Policy from time to time. The current version of the policy will govern our processing of your personal data and will always be available at on-life.io. If we make a change to this policy that, in our sole discretion, is material, we will notify you via an email to the email address associated with your account. If required by law, we will request your permission or give you the opportunity to opt out of any new uses of your Personal Information.