

# GEON NETWORK PRIVACY AND COOKIES POLICY

## PURPOSE OF THIS PRIVACY NOTICE

Geon Network Limited is committed to protecting and respecting your privacy. This policy, together with any agreement we enter into with you, including those relating to our token sale and use of the Geon App, sets out how your personal data will be treated, your privacy rights and how the law protects you.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## DATA CONTROLLER

Geon Network Limited is the data controller and responsible for your personal data (collectively referred to as **Company, we, us** or **our** in this privacy notice) and ensuring your data is processed in compliance with the General Data Protection Regulation (**GDPR**) or such data protection legislation as may be in force from time to time.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

## CONTACT DETAILS

Our full details are:

Full name of legal entity: GEON NETWORK LIMITED

Name or title of data privacy manager: hello@geon.network

Email address: hello@geon.network

Postal address: 6.20 World Trade Center, 6 Bayside Road, Gibraltar GX11 1AA

You have the right to make a complaint at any time to the [Gibraltar Regulatory Authority](#) (GRA), the Gibraltar supervisory authority for data protection issues. However, please contact us in the first instance as we will endeavour to deal with any concerns that you may have.

## CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This policy was last updated on the Version Date displayed at the top of the policy.

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate and possible, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. Where we need to collect personal data by law, or under the terms of a contract we have with you and if you fail to provide that data when requested, we

may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our website and using our products and services you are accepting and consenting to the practices described in this policy.

### **THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **INFORMATION WE COLLECT FROM YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (**anonymous data**).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes information about your identity such as name, address, date of birth, username or similar identifier, title, gender.
- **Contact Data** includes where you live and how to contact you including: address, email address and telephone numbers.
- **Financial Data** includes information about your financial position, status and history, and payment account details (can include bank, credit, payment and electronic money accounts and cryptocurrency wallets).
- **Transaction Data** includes details about transactions you make with or through us whether in fiat currency or cryptocurrency including transactions relating to any token sale.
- **Technical Data** includes details about the devices and technology you use including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website or services.
- **Profile Data** includes your username and password, purchases made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly

or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data about you including through:

- **Information you give us:**
  - when you apply for, or use, our products or services;
  - when you subscribe or contribute to our Token Sale;
  - create an account on our website;
  - when you communicate with us whether by phone, post, email, online or by other means;
  - when you use our websites or device applications;
  - in emails, letters and other correspondence;
  - give us feedback; and
  - when you request marketing to be sent to you by us or selected third parties;
  
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see the section on Cookies below.
  
- **Your use of our services.** The data we collect when you use our services (such as making transactions, viewing your account details or using any part of our website) includes:
  - Transaction Data;
  - Profile Data;
  - Usage Data; and
  - Technical Data
  
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Companies that introduce you to us;
  - Government and law enforcement agencies; and
  - Agents working on our behalf including fraud prevention agencies, analytics providers, advertisers.

## HOW WE USE YOUR DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where you consent to it;
- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer / contributor to a Token Sale, to ensure we can complete the Token Sale, to issue you tokens under the Token Sale, to verify your identity, to open an account, provide services to you and manage our relationship with you (e.g. inform you of changes and correspond with you)	<ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Financial</li> <li>d. Transaction</li> <li>e. Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>1. Performance of a contract with you</li> <li>2. Necessary to comply with a legal obligation</li> <li>3. Necessary for our legitimate interests (e.g. risk management and fraud prevention)</li> <li>4. Consent</li> </ul>
To enable you to use your account to make and receive payment transactions.	<ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Financial</li> <li>d. Transaction</li> </ul>	<ul style="list-style-type: none"> <li>1. Performance of a contract with you</li> <li>2. Necessary to comply with a legal obligation</li> <li>3. Necessary for our legitimate interests (e.g. risk management and fraud prevention).</li> <li>4. Consent</li> </ul>
To administer and protect our business, your account and our website, to improve our website and products/services (including troubleshooting, data analysis, testing, system maintenance, support, security, reporting, complying with our regulatory obligations and hosting of data)	<ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Financial</li> <li>d. Transaction</li> <li>e. Usage</li> </ul>	<ul style="list-style-type: none"> <li>1. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>2. Necessary to comply with a legal obligation.</li> </ul>

<p>To manage our relationship with you which will include notifying you about changes to our terms or privacy policy.</p>	<ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile</li> <li>d. Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>1. Performance of a contract with you</li> <li>2. Necessary to comply with a legal obligation</li> <li>3. Necessary for our legitimate interests (e.g. risk management and fraud prevention).</li> </ul>
<p>To give you, or allow selected third parties to give you, information about goods and services we think you may be interested in.</p>	<ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile</li> <li>d. Usage</li> <li>e. Marketing and Communications</li> <li>f. Technical</li> </ul>	<ul style="list-style-type: none"> <li>1. Consent</li> <li>2. Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business, to inform our marketing strategy to develop new products/services and grow our business)</li> </ul>
<p>To enable you to partake in a prize draw, competition or complete a survey.</p>	<ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile</li> <li>d. Usage</li> <li>e. Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>1. Performance of a contract with you.</li> <li>2. Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).</li> </ul>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p>	<ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Profile</li> <li>d. Usage</li> <li>e. Marketing and Communications</li> <li>f. Technical</li> </ul>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.</p>	<ul style="list-style-type: none"> <li>a. Identity</li> <li>b. Contact</li> <li>c. Technical</li> <li>d. Usage</li> <li>e. Profile</li> </ul>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## **PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

## **THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any company outside our group of companies for marketing purposes.

## **OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by emailing us at [hello@geon.network](mailto:hello@geon.network)

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **WHO WE MAY DISCLOSE YOUR INFORMATION TO**

You agree that we may disclose your personal information to:

- Any member of our group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries as reasonably necessary for the purposes, and on the legal bases, detailed in this policy;
- Our agents, advisors and business partners who we use to help manage your accounts and services, improve services and resolve issues such as legal disputes;
- HM Revenue & Customs, regulators and other authorities;
- Fraud prevention and credit reference agencies for the purpose of verifying your identity and ensuring the security of your account;
- Any party linked with you or your business's products or services;
- Organisations that introduce you to us;
- Organisations we introduce you to for marketing purposes;
- Analytics and search engine providers that assist us in the improvement and optimisation of our website;

- Any insurance company for the purposes of insuring risk; and
- Other entities where we are obliged to by law or to law enforcement agencies for the purposes of registration of fraud or suspected fraud or where we have your consent.

You agree that we can and will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- If substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [terms of use](#) and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

In addition to the disclosures detailed in this section, we may also disclose your personal information where it is necessary to do so: for compliance with a legal obligation; in order to protect the vital interests of you or another natural person; and for the establishment, exercise or defence of legal claims.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **HOW WE USE YOUR INFORMATION TO MAKE AUTOMATED DECISIONS**

We may use systems to make automated decisions based on information we hold about you. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you now or in the future. The following are some of the ways we may use systems to make automated decisions:

### *Tailoring products and services*

We may use your data along with that of other customer in order to study and learn about our customers' needs, and to make decisions based on what we learn. This helps us to design products and services for different customer groups, and to manage our relationships with them.

### *Fraud detection*

We use your personal information to help determine if your account is being used fraudulently or for money-laundering. If there is a risk of fraud, or money laundering, we may suspend or terminate your account and refuse access to your account.

### *Opening accounts*

We may use automated checks to help determine if you satisfy our criteria for an account, including fraud, money laundering and eligibility checks.

## **Your rights with respect to automated decisions:**

- You can ask that we do not make our decision based on the automated decision alone.
- You can object to an automated decision, and ask that a person reviews it.
- If you want to know more about these rights, or to exercise them, please contact us.

## **WHERE WE STORE AND TRANSFER YOUR PERSONAL DATA**

All information you provide to us will be transferred and stored in a jurisdiction located in the European Economic Area (EEA). However, we may transfer some or all of your data to countries outside of the EEA which may not offer the same level of protection as the GDPR with respect to the processing of your personal data. Where your data is transferred to such countries either a derogation allowed under Article 49 of the GDPR will apply or your data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission (EC) can be found on the EC's website: [here](#)

Where data is to be transferred to a group company in a country outside of the EEA which may not offer the same level of protection as the GDPR with respect to the processing of your personal data, we will ensure that the group company agrees to binding corporate rules in accordance with Article 47 of the GDPR. Further information can be found on the EC's website: [here](#)

Where we transfer data to organisations based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see EC's website page: [here](#)

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **KEEPING AND DELETING YOUR DATA**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

We keep certain data for minimum periods, namely:

- we retain Transaction Data for a minimum of six years after the date of the transaction;
- we retain certain Account Information, for a minimum of six years after your agreement with us has ended.

The majority of personal data we hold will be deleted 10 years after the termination of any agreement you have with us unless it is needed for other necessary or legitimate purposes.

In some circumstances you can ask us to delete your data: see request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## YOUR RIGHTS

Under the GDPR you have the right to:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights you will need to contact us at [hello@geon.network](mailto:hello@geon.network). In the case of exercising your right to access, you will also need to provide appropriate evidence of your identity.

### NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the contact details at the start of this policy.

## COOKIES POLICY

Our website uses cookies to distinguish you from other users of our website. A cookie is a small file of letters and numbers that we put on your computer if you agree. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

We use the following 4 main types of cookies:

**[Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website and enter into transactions.

**Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.]

If you wish you can change your cookie settings in your browser if you would like to prevent any cookies being stored on your online enabled device, but be aware that this may severely impact the functionality of the site.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.