

Privacy Policy

1st of August 2018

Please read this privacy policy (“**Privacy Policy**”) carefully before participating in the ICO. This Privacy Policy forms part of the Accompanying Documents, governing the processing of personal data of the Users by the Company for the purposes of the ICO, for participating in the ICO and the usage of the website <https://parkade.io/> (“**Website**”). Please note that the Privacy Policy does not apply to the services offered by the Company nor for registering an account.

Capitalized terms in this Privacy Policy are used in the meaning given to them in the Terms unless otherwise expressly set out herein.

In case you are providing to the Company personal data of third persons, you are obliged to provide to those persons the necessary notifications and, if required, make sure they acquaint themselves with the content of this Privacy Policy, as required under applicable legislation.

1 CONTROLLER

1.1 The controller of your personal data processed for the purposes of the ICO is Parkade Holdings OÜ, an Estonian limited liability company, with a commercial registry no. 14516121, registered address Narva mnt 5, Tallinn, 10117, Estonia („**Controller**“).

E-mail: vik@parkade.io.

2 DATA PROTECTION OFFICER

2.1 You shall have the right to communicate with our data protection officer in order to obtain information on the processing of your personal data, using the following contact information:

E-mail: vik@parkade.io

3 CATEGORIES AND SOURCES OF PERSONAL DATA THE CONTROLLER COLLECTS AND PROCESSES

3.1 Personal data are information that can be used to directly or indirectly uniquely identify, contact, or locate you as a private individual (“**Personal Data**”). The source of collected Personal Data depends on how you communicate with the Controller.

3.2 The Controller collects and processes the following categories of your Personal Data:

3.2.1 **Wallet Data.** Including but not limited to: your personal crypto currency account addresses. (“**Wallet Data**”)

Source: Provided by the User himself/herself.

3.2.2 **Know Your Customer Data.** The Controller may collect any data given related to participating in the ICO, including but not limited to: your first and last name, personal identification code (if exists), date and place of birth, phone number and area code, e-mail, place of residence (address), profession or field of activity, whether or not you are a politically exposed person (“**PEP**”), family member of PEP or person known to be close associate of PEP, data regarding beneficial ownership, copy of identification document, utility bill (for rent, electricity, gas, water, telecommunication services or other similar services), bank or credit card statement, tax bill, credit card type, expiration date, and certain digits of the your card number, details of your transaction history. In

case the User is a legal person, the following data may be collected and processed regarding the User's representative, including but not limited to: first and last name, basis for representation, data regarding beneficial ownership, copy of identification document, utility bill (for rent, electricity, gas, water, telecommunication services or other similar services), bank or credit card statement, tax bill. Regarding beneficial owners, the following data may be collected and processed regarding the beneficial owner, including but not limited to: name, personal identification code (if exists), date and place of birth, place of residence. ("**KYC Data**")

Source: Questionnaire filled out or data provided via other means by the User.

- 3.2.3 **Qualification Data.** The Controller may collect any given data to determine Qualified Investors within the meaning of Article 2(1)(e) of the Prospectus Directive or similar legislation in any other jurisdiction, including but not limited to: size of income, assets and net worth of the User. ("**Qualification Data**")

Source: Information and documents provided by the User.

- 3.2.4 **Communication Data.** The Controller may collect any data relating to any correspondence exchanged between you and the Controller, including any personal information retained in such correspondence, including but not limited to: your name, e-mail, contents of the message, your nicknames and/or social media account names and addresses, when contacting the Company via its official social media accounts. ("**Communications Data**")

Source: Information the User provides during the communications.

- 3.2.5 **Technical Data.** The Controller may collect any device or ICO related data, that has been given and/or sent by you, or by your device, to the Controller via using the Website or via other means of communication, including but not limited to: hardware model used, operating system version used, web browser used, unique device identifiers, statistics about the your device, server log information (the date and time of visit, pages viewed, time spent on the Website, etc.). ("**Technical Data**")

Source: While the User uses the Website, the Controller collects Technical Data from the User's device automatically.

- 3.2.6 **Cookie Data.** The Controller uses cookies on the Website, which may collect your Personal Data. For further information see Section 4 of this Privacy Policy. ("**Cookie Data**")

4 COOKIES

- 4.1 The Controller is using cookies and similar technologies on the Website to analyse user-generated traffic, as well as enhance and optimize the user experience offered by the Website. To the extent allowed by your browser settings and your device, you may consent the use of third party cookies that track your behaviour and show advertisements based on your interests and preferences.

- 4.2 The legal basis for using essential cookies is the Controller's legitimate interest to provide the basic functionalities of the Website. The essential cookies include but are not limited to the following types of cookies:

- 4.2.1 Session cookies to maintain the functionality of the Website;

- 4.2.2 User-centric security cookies to detect authentication abuses;
 - 4.2.3 Multimedia content player cookies to store technical data to play back video or audio content on the Website;
 - 4.2.4 Load-balancing cookies for improving distribution of workloads;
 - 4.2.5 User interface customisation cookies for determining language or font preferences.
- 4.3** Data collected via Cookies mentioned in Section 4.2 above are retained for a period of 90 days.
- 4.4** The legal basis for using following cookies is your consent. These cookies are applied or may be applied on the Webpage only after you have given your consent for the application of such cookies:
- 4.4.1 Performance cookies and analytics technologies to collect information about how you use the Website. The foregoing data collected via cookies are retained for 120 days.
 - 4.4.2 Web beacons are bits of data that count the number of Users who access the Website and allow the Controller to see if a cookie has been activated. The Controller may use this information to identify which emails are more interesting to the Users. This information is aggregated and does not identify you individually. The foregoing data collected via cookies are retained for 120 days.
 - 4.4.3 Third party cookies applied by the Company, but the application of which may result in revealing personal data related to you to third parties and may result in storage or access to information stored on your terminal equipment:
 - 4.4.3.1 *Cookies deployed by Google Double Click (doubleclick.net) are used for behavioural targeting, ad delivery and improved reporting on campaign performance. The foregoing data collected via cookies are retained for 90 days;*
 - 4.4.3.2 *Cookies deployed by Youtube (youtube.com) (including cookies by Google Analytics) are used for registering anonymous statistical data on for example how many times the video displayed and what settings are used for playback. The foregoing data collected via cookies are retained for 90 days;*
- 4.5** You have the possibility to allow or deny cookies using the browser settings. If you prefer not to receive cookies, you may set the browser to refuse all cookies or send an alert when a cookie is issued. Additional information how to manage the cookie settings of the browser can be found here: [Internet Explorer](#), [Chrome](#), [Firefox](#), [Safari](#), [Opera](#).

5 THE PURPOSES OF AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

- 5.1** The Controller's legal basis to process your Personal Data depends on the objective and context in which the Controller collects the Personal Data. The Company processes Personal Data on the following four legal grounds: **performance of a legal obligation, performance of the Terms, the Controller's legitimate interest** and your **consent**.
- 5.2** If the legal basis for processing your Personal Data is:
- 5.2.1 legitimate interest, this means first and foremost the objective of providing the essential functionalities of the Website and carrying out the ICO;

- 5.2.2 consent, this means first and foremost the objective of ensuring an effective user experience by adjusting content, as without your consent it would not be possible to tailor the Website to meet your preferences;
- 5.2.3 performance of the Terms, this means first and foremost the objective of preparing and fulfilling the token sales and purchase agreement in the form of the Terms;
- 5.2.4 compliance with an obligation arising from legislation, this means first and foremost that the Controller is required to process certain personal data by law. In this case the Controller cannot decide which data are collected, as it derives from applicable laws.

5.3 The following depicts a list of processing purposes that are linked to specific data categories and legal basis for processing:

Processing purpose	Legal basis for the processing purpose	Categories of personal data used by the Controller for the processing purpose
Diagnose and repair problems with the ICO and the Website	Legitimate interest in providing data security and prevent fraudulent actions	Technical data
Administer the ICO, through the conclusion (including preparatory measures) and enforcement of the Terms	Performance of the Terms	KYC Data, Technical Data, Wallet Data
Enabling communication between the User and the Controller	Legitimate interest in carrying out the ICO	Communication Data, Technical Data
Providing the User a possibility to buy/sell PRKC tokens from/to the Controller according to the Terms	Performance of the Terms	KYC Data, Technical Data, Wallet Data
Providing functioning and accessible Website	Legitimate interest in providing basic functionalities of the Website with relevant information about the ICO	Technical Data, Cookie Data
Performance of the KYC procedures	Legitimate interest in detecting and preventing crime, fraudulent actions with the purpose of monetizing the ICO proceeds	KYC Data
Improve, personalise and develop the Website	Legitimate interest in developing and enhancing the Website and the	Technical Data, Cookie Data

	user experience in the course of regular business activities	
Determining Qualified Investors; determining User's eligibility for participating in ICO	Performance of the Terms	Qualification Data
Verifying the User's identity	Performance of the Terms	KYC Data
Developing consumer profiles, perform sales analysis and identifying marketing opportunities and strategies; tailoring the contents of the Website and general communication to suit User's preferences	Consent	Technical Data, Cookie Data

5.4 The Controller may process your data for other purposes, provided that the Controller discloses the purposes and the use to you at the relevant time, and that you either consent to the proposed use of the Personal Data or the new purpose is compatible with the original purpose brought out herein.

6 RETENTION OF PERSONAL DATA

6.1 User's data (all categories mentioned in Section 3) shall be stored insofar as reasonably necessary to attain the objectives stated in Section **Error! Reference source not found.** of this Privacy Policy, unless stipulated otherwise in applicable laws or in the following:

6.1.1 Technical Data are retained for 3 years as of the collection of the Personal Data.

6.1.2 Wallet Data are retained for 5 years as of the collection of the Personal Data.

6.1.3 KYC Data are retained for 10 years as of the collection of the Personal Data.

6.1.4 Qualification Data are retained for as long as the User holds PRKC tokens and 5 years thereafter.

6.1.5 Communication Data are retained no longer than for 3 years as of the creation of such data.

6.2 After the term mentioned in Section 6.1. of this Privacy Policy, the Controller will delete your respective data immediately, except as noted below:

6.2.1 The Controller retains your Personal Data for a longer period if it is necessary to comply with the Controller's legal obligations, meet regulatory requirements, resolve disputes, and enforce the Terms.

6.2.2 The Controller may anonymize your Personal Data and retain this anonymized information indefinitely.

7 SHARING THE PERSONAL DATA AND DATA TRANSFER OUTSIDE OF THE EU OR EEA („EU/EEA“)

7.1 Only the Controller's authorised processors have access to the personal data and they may access the data only for the purpose of conducting the ICO, resolving issues associated with the ICO and the Website.

7.2 The Controller does not disclose any User-related data to any third parties except for:

Categories of Recipients	Reason for sharing
Law enforcement and data protection authorities	Only if the Controller is under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so under applicable law, by a court order or for the purposes of prevention of fraud or other crime); your personal data in order to comply with any legal obligation (for example, if required to do so under applicable law, by a court order or for the purposes of prevention of fraud or other crime).
Operational service providers (legal advisors, auditors etc. bound to confidentiality)	Ensuring adequate performance of the ICO and functioning of the Website; enforcing the Terms and other legal rights deriving from the Accompanying Documents.
Authorised processors	The Controller may transfer personal data to third party service providers who act as data processors and may operate the technical infrastructure that The Controller needs to host, store manage and maintain the Website, its contents and the data that Controller processes, also to provide data backup and security. Please see the list of the categories of the processors used by the Controller: [...].

7.3 Please note that, some operational service providers might be located outside the EU/EEA, thus the Controller may transfer your Personal Data outside the EU/EEA. In such cases the Controller shall opt to use special Personal Data protection safeguards, in order to ensure the safety of your Personal Data. You have the right to get acquainted with or obtain information on the transferring of your Personal Data outside the EU/EEA by contacting the Controller using the contact information specified in Sections 1 and 2 of this Privacy Policy.

7.4 The Controller is established in the EU and may, from time to time, transfer Personal Data to Canada, in relation to which an adequacy decision has been adopted by the EU Commission, to the extent your Personal Data is protected under the Canadian Personal Information Protection and Electronic Documents Act.

8 YOUR RIGHTS

8.1 If you are a resident of the EU/EEA, then you have the following data protection rights, which can be exercised by contacting the Controller via contact information referred to in Sections 1 and 2 of this Privacy Policy. You have right to:

- 8.1.1 access your Personal Data processed by the Controller and you may demand the correction of inaccurate personal data or demand the erasure thereof;
- 8.1.2 request restriction of the processing of the Personal Data in respect of them, or the right to object to the processing if it is based on the Controller's legitimate interest, as well as the right to portability of your Personal Data (transmission of the Personal Data to another legal or natural person), including by electronic means;
- 8.1.3 recourse to the Data Protection Inspectorate or a court if you find that your rights are violated in the processing of Personal Data, unless a different procedure for contestation is provided under applicable legislation;
- 8.1.4 not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce significant effect;
- 8.1.5 withdraw your consent to the processing of Personal Data in the cases where the legal basis for Personal Data processing is your consent. For withdrawing your consent, you may use the contact information referred to in Sections 1 and 2 of this Privacy Policy.

9 OTHER

- 9.1** The Controller may unilaterally modify the Privacy Policy from time to time. The latest version of the Privacy Policy is always accessible on the Website.

If you have any questions regarding the processing of your personal data or exercising your rights in relation to the Privacy Policy, please contact the Controller at the contact details provided in Sections 1 and 2 of this Privacy Policy.