

Privacy Statement for participants of 2local ICO

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What is this privacy statement?

This privacy statement is intended to explain in a simple and clear manner what personal data we collect about you and how we process it. The Declaration shall apply to the following persons:

- All existing and potential customers of 2local. According to the ' Know your customer ' rules, we are legally obliged to keep personal data about you, even for a certain period of time after you are no longer a customer. Anyone involved in a transaction on the 2local.io website or 2local app, whether that is personal or as a representative of a legal entity (for example, a manager, intermediary, legal representative, operational employee).
- With personal data we mean all information that tells us something about you or that we can link to you. This includes, for example, your name, address, date of birth, account number, IP address or information about transactions from your account. With processing, we mean everything we can do with this data, such as collecting, capturing, storing, modifying, organizing, using, disclosing, passing or deleting.

For the KYC/AML screening We make use of the services of PESCHECK. PESCHECK's Privacy statement can be found at www.pescheck.nl/privacy-policy/and may be considered as repeated and inserted here.

What data do we collect about you?

We collect, among other things, the following personal data:

- **Identification**, such as your name, surname, date of birth, place of birth, identification number, e-mail address and the IP address of your computer or mobile device;
- **Transaction**, such as your wallet number, secret key, rewriting, and transfers that involve your account;
- **Special Personal Data**

We do not record any particular personal data that is related to your health, ethnicity, religious or political beliefs.

What do we do with your personal data?

We only use your personal data for administrative purposes.

- **Administration** – When you open an account at 2local and purchase more than €1,000,- per month of L2L tokens, we are legally obliged to collect personal data in order to establish your identity (such as a copy of your identity card or passport) and to Determine if you can become a customer with us.
- **Personal Marketing** – Based on your personal situation, we may send you letters, e-mails or text messages with a product or service offer or show you such offer when you sign up on our website or in a mobile app. You can no longer wish to receive such personal offers. You have the right not to agree to or object to personal direct marketing or commercial activities. This also applies to the profiling that is part of these activities.
- **Improvement and development of products and services** – With analyses of how you use our products and services, we gain more insight into you and find out how we can improve ourselves. Such as:
 - ★ We analyze information about transactions. This way we can determine where and how to improve the Android and iOS.
 - ★ We analyze the results of our marketing activities to measure how effective these are and how relevant our actions are.
 - ★ We analyze the purchases. This way we can determine personal offers to do.
 - ★ We may use your information to send you personal offers via email or through our website or mobile apps. You have the right to object to personal direct marketing or commercial activities at any time. This also applies to the profiling that is part of these activities.
- **Prevention and recognition of fraud and data security**– We have a duty to protect your personal data and prevent, detect and limit security breaches. This also applies to the information that we are obliged to collect about you. For example, to comply with the laws and regulations against money laundering, terrorist financing and tax fraud.

- We may process your personal data for the purpose of protecting you and your financial assets against fraudulent activities, for example if you have become a victim of identity theft, hacking or if someone else has your personal data in Hands.
- We may use certain information about you to create profiles (name, account number, age, nationality, IP address, etc.) to recognize certain criminal activities and to find out the person behind them.

Data we process for other purposes are anonymized or stripped of personal information as much as possible.

Who do we share your data with and why?

KYC/AML-screener

We Exchange data with the KYC-screener, namely PESCHECK from Enchede (The Netherlands). The PESCHECK Privacy statement is available at www.pescheck.nl/privacy-policy/ and can be considered as repeated and inserted here. PESCHECK is taking care of the legal screening of customers who purchase more than €1,000,- per month of L2L tokens. Data exchange always takes place in accordance with Global Data Protection Policy (GDPR) the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

Public authorities

To comply with the laws and regulations, we may pass on data to the relevant authorities, for example to counter terrorism or prevent money laundering.

In certain cases, we are legally obliged to share your information with third parties, including:

- **Public authorities, regulatory authorities Supervisors,** such as the central Bank of the countries in which we operate.
- **The Tax Office** Can ask us to pass on your data credits.
- **Judicial/Law enforcement agencies** such as the police, prosecutors, courts and organizations engaged in arbitration or mediation after they have requested explicit and legal grounds.

When we share your personal data internally or with third parties in other countries, we always ensure appropriate safeguards to protect this data. L2L is hereby based on:

- Global Data Protection Policy (GDPR) the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.
- EU model contracts. These include standard provisions used in agreements with service providers to ensure that the transfer of data to countries outside the European Economic Area complies with European laws and regulations in respect of Protection.
- Privacy Shield, an agreement for the protection of personal data transmitted to the United States.

What are your rights and how do we deal with them?

We respect the right that you have as a customer to determine how your personal data is used. These are the following rights.

The right to view information

You have the right to view the personal data processed by us.

The right to rectification

If your personal data is inaccurate, you have the right to ask us to correct it. If we have shared information about you with third parties and then this data has been corrected, these third parties will be notified accordingly.

The right to object to processing You can object to the use of your personal data by 2local for legitimate interests, this may be online. We will consider your objection and investigate whether the processing of your information has such a major impact on you that we must discontinue this processing. You cannot object to the processing of your personal data if this occurs as a result of legal obligations, to comply with contractual obligations to you or in case of problems with the security of your account (for example, if your Account is blocked).

The right to limited processing

In the cases below, you have the right to ask us to limit the use of your personal data.

- You believe that the information is incorrect.
- We process the data unlawfully.
- 2local no longer needs the data, but you want us to keep it for use in a legal process.
- You have objected to our use of your data for legitimate interests.

The right to transfer data You have the right to ask us to transfer your personal data directly to you or another company. This applies to personal data that we process with your consent or on the basis of a contract with you automated. As far as technically possible we will transfer your personal data.

The right to Erasure

You can ask us to erase your personal data in the following cases.

- We no longer need it for the original purpose.
- You withdraw your consent for processing.
- You object to our use of your data for legitimate interests.
- 2local processes your personal data unlawfully.
- A law of the European Union or a Member State requires 2local to erase your personal data..

The right to complain

If you are not satisfied with the way in which we have responded to your objections, you have the right to complain to us. If you are dissatisfied with our response to your complaint, you can appeal to 2local. You can also contact the authority that is responsible for the protection of personal data in your country.

Use your Rights

If you wish to make use of your rights or wish to file a complaint, you can contact us via the website 2local.io.

We strive to respond to your request as soon as possible. Sometimes this can take up to a month (if permitted by law). If we need more time to handle your request, we'll let you know how much extra time we need and what the reason for the delay is.

In some cases, we may reject your request. If permitted by law, we will inform you in due time about the reason for rejection.

Your obligation to provide data

We need certain information about you to fulfill our obligations as 2local and our associated contractual obligation. There is also information that we must collect according to the law. Without this information, we may not be able to provide you with an opportunity to purchase €1,000,- or more per month.

How do we protect your personal data?

Within 2local we use an internal policy framework and minimum standards to protect your data. More specifically and in accordance with applicable laws and regulations, we take appropriate technical and organizational measures (policies and procedures, IT security, etc.) so that the confidentiality and integrity of your personal data and the way Processed is ensured. In addition, employees of 2local are obliged to confidentiality and they may not disclose your personal data unlawfully or unnecessarily.

What can you do to protect your data?

We do everything to protect your data, but there are also things you can do yourself:

- Install antivirus software,
- AntiSpyware software and a firewall and keep it up to date.
- Never leave equipment unattended.
- Instantly change your password on suspicion of Disadvice.
- Keep your passwords strictly confidential and use secure passwords, so no obvious combinations of letters and numbers.
- Be alert when you are online and make sure you know what unusual activities you can recognize. Example is a new web address or phishing emails asking for personal information.

How long do we keep your personal data?

We may retain your personal data for as long as it is necessary for the purpose for which it was originally collected. After this period, your data is deleted.

How can you contact us?

If you want to know more about the policy of 2local when it comes to data processing and how we use your personal data, you can contact us via the website 2local.io.

Applicability of this privacy statement

This is the privacy Statement of 2local. The statement applies to all 2local entities insofar as they process personal data.

This privacy statement may be adapted to modified laws and regulations and/or to the manner in which we process personal data. This version is from July 2019.

The latest version is available at 2local.io

