

# PRIVACY POLICY Smilo Platform B.V.

We are Smilo Platform B.V. We respect your privacy and private life, but sometimes we need your personal data. In this privacy policy we explain which data we use and how we save, protect and process this data. This privacy policy applies to our website <https://smilo.io/> (the "Website") and the services that we offer (the "Services"). We comply with the General Data Protection Regulation (the "Relevant Legislation").

## Are you under the age of sixteen?

If you are younger than sixteen years old, you cannot use our Website and Services without the permission of your parents or legal guardian.

## Personal data

To offer our Website and Services we process personal data. "Personal data" means any information relating to an identified or identifiable natural person. This definition used in our Privacy Policy is not identical to the definition of Personal Data as stipulated in the Relevant Legislation for reasons of readability.

## Your permission

We can store your data at various moments, for example when you visit our Website, create an account via our Website, use our Services or when you contact us. We are allowed to process your data because we ask your permission via this privacy policy. In addition, we need your data to carry out the agreement between you and us. If you choose not to share your data, then in case one does not want to comply with our know your customer (KYC) or privacy regulations, we will not be able to accept them as part of our whitelist and as such you will not be able to participate in the ICO and/or bounty program of Smilo Platform B.V.

We will not process your data without your consent, unless we are legally obliged to do so.

## What data do we collect and how do we use your data?

To use our Website and Services, we need the following data:

- Your name
- Your date of birth
- Your address
- Your residence
- Your e-mail address
- Pictures that are clearly identifiable
- Your citizen service number and/or the document number of your passport or ID with a clear picture of you holding this official document
- Blockchain wallet addresses

We can also store the following non-personal data if you use our Website:

### **Login**

We save the following data to your account: username, linked encrypted password. This way, you don't need to provide us with your data again.

### **Newsletter**

Smilo Platform B.V. offers newsletters. That way, you are fully informed of (discount)offers and other news. We use an double opt-in system to be sure of your permission. This means that you verify your permission for any new confirmation. We ask you for this verification via an email that we send to the address you have given us. Every time we send you a newsletter you have the possibility to unsubscribe from the newsletter.

We will only use your personal data for the purposes listed above or any other purpose that is connected thereto. This way, your data will never be used by us in an unexpected way.

## **Automatic decision-making**

Based on your data we can make decisions automatically, for example blacklisting of spammers and bad actors, automated bounty rewards, captcha approval or denial. We make these decisions based on Smilo Network Protocol. Such a decision may have the consequence that blacklisting of spammers and bad actors, automated bounty rewards, captcha approval or denial. It is important that we make such decisions because Through our decentralised blockchain platform we are able to automate certain actions to the advantage of impartial and efficient ruling..

## **Security**

We work hard to protect your personal data from unauthorized or unlawful access, alteration, disclosure, use or destruction. That way, unauthorized persons do not have access to your data. We take the following measures to protect your personal data:

- Encryption of digital files that contain personal data
- Secure network connections with Secure Socket Layer (SSL) technology or a technology that is similar to SSL
- The access to the data is limited to the persons that need the data
- The access of the data is secured with two-step verification

## **How long do we store your data?**

We shall store your personal data for as long as necessary to fulfil the purposes listed above.

## **Transfer**

We will only process your data within the European Union. We will only process your data outside of the European Union if the country has an effective protection level for your data.

We will never transfer your data to other countries or other parties then described above.

## Links

You may find advertising or other content on our Website that link to other websites. We do not control the content on these websites and are not responsible for the content or the privacy protection of these websites. We advise you to read the privacy policies of those websites.

## Modifications to this privacy policy

We may update our privacy policy from time to time. When we change this privacy policy in a significant way, we will post a notification on our Website along with the updated privacy policy. We also inform users that are registered with an email address in case of any significant moderation. If you are not registered as user we advise you to visit the Website and this policy regularly.

## Your rights

The data we collect is personal. Therefore, you have the following rights:

- You may request access to the personal data we process about you;
- You may request us to correct, update, shield or delete your personal information in our records. In the event of fraud, non-payment, or other wrongful act, we can keep some data in a register on a blacklist;
- You may request a copy of the personal data we have processed about you. We can - on your request - send this copy to another party, so you don't have to send the data yourself;
- You may file a complaint against processing your data;
- You may file a complaint with the Dutch Data Protection Authority(Autoriteit Persoonsgegevens), if you are under the impression that we process your data unlawfully;
- You may always withdraw your consent to process your data. We cannot process your data from the moment you withdraw your consent.

Should you have further questions regarding this privacy policy, please contact us via the information below.

## Contact information

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