

## **Privacy Policy**

### **Moozicore Token Sale**

The Privacy Policy presents how we process and protect personal data of our users who register to the Service available at <https://tokensale.moozicore.com> you become our user (“user”, “users”, “you”, “your”).

The general Moozicore Terms and Conditions (“T&C”) which explain how you can use the Service is available at <https://tokensale.moozicore.com>

#### **I. Who handles your personal data**

We shall handle it. We are Moozicore sp. z o.o. a Polish company. We have our registered seat in Poznań (postal code 61-894), at Plac Władysława Andersa 7 and we are entered into the register of entrepreneurs of the National Court Register kept by the District Court of Poznań – Nowe Miasto and Wilda in Poznań, VIII Commercial Department of the National Court Register under KRS number 0000718249, REGON: 369457682, NIP (TAX ID): 7831772602 (“Moozicore”, “we”, “us”, “our”).

We will handle all the data connected to the Service, including all personal data processed by the Service.

All devices that process the personal data which is collected through the Services will be in the European Union. This is good news for you, as this means that user personal data protection will be compliant with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/WE (General Data Protection Regulation), (“Regulation” or “GDPR”).

If you are not in an EU Member State when you register or log on/in the Service, the Regulation will not apply. We will continue to protect your personal data in accordance with the Regulation, but you take responsibility for any mishandling of your personal data that happens on such occasions.

#### **II How we process your personal data**

We primarily process your personal data to provide you with the Service – as outlined in the T&C. Specifically, we process your personal data to:

1. enable registration and create a user account on the Service, the processing in this case is carried out on the basis of art. 6 point 1 letter a of the GDPR,
2. verify your identity, including data necessary for counteracting money laundering (AML- Anti Money Laundering), the processing in this case is carried out on the basis of art. 6 point 1 letter c of the GDPR,
3. enable you to purchase MZI GOLD tokens available through the Service, this is carried out on the basis of art. 6 point 1 letter b of the GDPR,

To do the above, we will process following personal data:

1. Data required to create the account and to use the Service:
  - 1.1. user name and login data,
  - 1.2. contact details, such as email address, telephone number, home address,
2. Data required to verify the user's identity, including data required to ensure the AML rules' compliance:
  - 2.1. first and last name,
  - 2.2. address,
  - 2.3. date of birth,
  - 2.4. citizenship,
  - 2.5. country of birth,
  - 2.6. passport number,
  - 2.7. statement on the origin of funds for purchasing MZI GOLD tokens,
  - 2.8. a photo of the user's passport first page,
  - 2.9. the image of the user,
  - 2.10. the ID of the user's individual wallet.
3. Data collected by the IT system based on user's activity through the Service:
  - 3.1. metadata related to your location when you log into the Service,
  - 3.2. metadata related to your settings of the Service,
  - 3.3. metadata related to the exact time of using the Service,

We believe that all the data you provide are true and correct. Unfortunately, as we cannot verify that independently, we will not be liable for any incorrect, incomplete or false data you provide us with or for any legal consequences related to providing incorrect, incomplete or false data.

The data indicated in points 1 and 2 above is provided directly by the user.

You provide all your personal data voluntarily. When you complete and send the interactive forms and/or provide us with the required files and documents you give your consent for their processing for the purposes listed above.

We collect the data indicated in points 3 while you use the Service.

You give your consent to collect such data by using the Service according to T&C.

In addition to the above-mentioned purposes, we may process the collected personal data to:

1. contact you when it is required to ensure proper operation of the Service,
2. send you newsletters (only if you subscribed),
3. send information on our products and services,
4. send information on products and services of entities we cooperate with (only if you gave your consent) .
5. facilitate to run the Service,
6. facilitate your access to your personal data we collected,
7. monitor and test effectiveness of the services provided,
8. design and test new functionalities and services,
9. prepare statistic data on the use of the Service provided,
10. take actions against or preventing misuse of the services provided,

We verify the users to make sure we comply with AML rules set by the Anti-Money Laundering and Counter-Terrorism Financing Act of March 1, 2018 (Journal of Laws of 2018, item 723). Specifically, we:

1. analyse whether the funds use by within the Service originate from a legal source ;
2. confirm your actual identity.

Your data shall be verified for AML purposes by either:

1. one of our employees or associates or
2. our external advisor specializing in AML- risk analyses.

### **III Personal data use by the third parties**

We will protect your personal data, we collected as required by the Regulation at all time. Sometimes, we will need to share it with third parties and our employees. We will ensure that this will only be done to ensure smooth operation of the Services, namely to:

1. in order to carry out the user's verification procedure to meet the legal requirements for AML (Anti-Money Laundering),
2. to ensure the correct, safe and lawful operation of the Service,
3. settle accounts within for your use of the Service,
4. ask a third party to operate the Service or some of its parts on our behalf for us,
5. assert our legitimate claims,
6. do other things – if you permit us.

We will not sell or otherwise share your personal data with third parties except when you give your consent, law or a court of law so requires or to operate the Service.

Sharing your personal data to the third parties will always be compliant with the Regulation and other relevant rules.

### **IV Age restrictions**

You may only use the Service if you are of legal age and enjoy full legal capacity in your country of origin.

### **V Protection of personal data**

We ensure that we shall take reasonable technical and organizational measures to ensure confidentiality, integrity and availability of the your personal data we collect. Only duly authorized personnel and third parties that ensure compliance with the requirements of the Regulation regarding the processing and security of the personal data can process your personal data we collect. Personal data are processed using secured hardware and distributed databases. including additional logging to data, including Personnel accessing higher risk data (copies of documents, image of the person), encryption and pseudonymisation of the personal data need a higher-level clearance as access to the higher risk data is additionally protected.

We undertake actions to minimize the risk of sending personal data through the internet. Notwithstanding the above, we need to remind you that sending anything, including personal data, through the internet is not entirely secure and may be susceptible to risks we cannot mitigate.

We cannot be held liable for any risk associated with your use of end devices. It remains only your duty to ensure an adequate level of security of your end devices and software you use to access the Service.

In the scope of the verification necessary to carry out the AML verification procedure, We will use automatic decision-making mechanisms to verify the credibility of the person. Such mechanisms do not provide for user profiling. These activities are necessary in order to perform the contract, under which the user will be able to purchase tokens offered by the Administrator. Decision-making mechanisms are set out in the Moozicore T&C. In this case, you have the right to appeal against the decision taken in an automated manner. The appeal can be directed to the following e-mail address: [gdpr@moozicore.com](mailto:gdpr@moozicore.com)

## **VI Personal data storage period**

The personal data will be processed:

- until withdrawal of a consent to their processing,
- until the completion of the contract on sale of tokens offered by the Administrator, including the time frame of the statute of limitation of any claims that may be related to the improper performance of the contract,
- for a period of 5 years from the end of the year in which the verification procedure was carried out, in the case of data processed for the purpose of carrying out the AML.

## **VII Your rights**

You have following rights connected to our processing of your personal data:

1. you can withdraw consent to the processing of the personal data; personal data processing from before the withdrawal remains legal,
2. you can request access to your personal data, which is implemented, among others, through access to data provided in the Service,
3. you can request correction (rectification) of your personal data collected, which is implemented, among others, by the possibility of correcting user's data in the Service,
4. you can request removal of your personal data collected, to the extent that it does not violate the legal obligations imposed on the Administrator, including the possibility of removing the User's account from the Service,
5. you can request a restriction of your personal data collected,
6. you can transfer personal data, including right to receive a copy of your personal data in a machine-readable format,
7. you can object to the processing of your personal data, including its processing for direct marketing,
8. you can file a complaint with the relevant supervisory body, i.e. Inspector General for the Protection of Personal Data (Prezes Urzędu Ochrony Danych Osobowych).

We will implement all users' rights related to the processing of the personal data in accordance with the Regulation.

In order to efficiently execute inquiries and requests related to the processing of personal data, please forward your questions or concerns to [gdpr@moozicore.com](mailto:gdpr@moozicore.com)

## **VIII – Cookie policy**

When visiting Service, small files can be saved (cookies) on your end device. We use cookies to store various information which ensures that your user experience of the Service is smooth. We had to encrypt these files to prevent access to their content by anybody but us.

According to the software settings used on your end device, the following cookies are used:

1. technical cookies that ensure proper operation and display of the Service in the browser you use, as well as ensure the safety of your activities in the Service, continuity of the session in case of logging in.
2. analytical cookies, which allow us to monitor Service statistics, verify the display content frequency, aid in fraud detection within the Service through the application of automated actions (bots).

Technical cookies are mostly stored on the your end device within a given session of using the Service. These cookies are deleted when a session ends, or the browser is turned off. Other cookies can be permanently saved on your end device.

You can change the way cookies are used on your end device. It is possible to disable saving of the cookies, but it may cause the Service to malfunction.

How you change the cookies settings depends on the software used by your end device.