

Privacy Policy

Effective 17 April 2018

Caution: We may change this Privacy Policy in our sole discretion at any time. Any revisions to this Privacy Policy will be posted on the home page of our Website. It is your obligation to periodically visit our Website to review any changes that may be made to this Privacy Policy. Your continued use of our Website constitutes your agreement to be bound by any such changes to this Privacy Policy. If you do not agree with this Privacy Policy, you are not authorized to use our Website and your sole recourse is to not use our Website.

1. Introduction

Velix.ID is developing the blockchain technology enabled platforms as further described in the White Paper updated and/or amended from time to time at the sole discretion of Company (“White Paper”), which is available via the link: <https://www.velix.id/assets/Velix.ID%20White%20Paper.pdf>

At Velix.ID the privacy and security of our users, Purchasers and visitors are of paramount importance. Velix.ID is committed to protecting the data you share with us. This privacy policy explains how Velix.ID processes information that can be used to directly or indirectly identify an individual (“Personal Data”) collected through use of its website and platform.

For the purposes of this policy, Velix.ID defines the term “User” as an entity or person with which Velix.ID has an established relationship, as well as an individual that visits our front-end website (for example www.Velix.ID).

Any information stored on Velix.ID’s platform is treated as confidential. All information is stored securely and is accessed by authorized personnel only. Velix.ID implements and maintains appropriate technical, security and organisational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

2. Collection and use

2.1 General

The following sections cover the specifics of each of the three groups from which data is collected: website Visitors, Purchasers and Users.

2.2 Website Visitors

If you are a Visitor to our website only, and not a Purchaser or a user of our platform, then this section is relevant for you.

By visiting this website, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not visit this website. If required by applicable law, we will seek your explicit consent to process Personal Data collected on this website or volunteered by you. Kindly note that any

consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible.

Velix.ID may collect, record and analyze information of Visitors to its website. We may record your IP address and use cookies. Velix.ID may add information collected by way of pageview activity. Furthermore, Velix.ID may collect and process any Personal Data that you volunteer to us in our website's forms, such as when you register for events or sign up for information and newsletters. If you provide Velix.ID with your social media details, Velix.ID may retrieve publicly available information about you from social media.

Such Personal Data may comprise your IP address, first and last name, your postal and email address, your telephone number, your job title, data for social networks, your areas of interest, interest in Velix.ID products, and certain information about the company you are working for (company name and address), as well as information as to the type of relationship that exists between Velix.ID and yourself.

Velix.ID gathers data about visits to the website, including numbers of Visitors and visits, Geo-location data, length of time spent on the site, pages clicked on or where Visitors have come.

2.2.1 Purpose of processing personal data

Velix.ID uses the collected data to communicate with Visitors, to customize content for Visitors, to show ads on other websites to Visitors, and to improve its website by analyzing how Visitors navigate its website.

2.2.2 Sharing personal data

Velix.ID may also share such information with service vendors or contractors in order to provide a requested service or transaction or in order to analyze the Visitor behavior on its website.

2.2.3 Cookies

Cookies are small pieces of information sent by a website to a Visitor's hard disk. Cookies cannot be used to run programs or deliver viruses to your computer. By continuing to visit the website, you agree to the placement of cookies on your device. If you choose not to accept our cookies, we cannot guarantee that your experience will be as fulfilling as it would otherwise be. We may also place cookies from third parties for functional and marketing purposes. The use of cookies is widespread and benefits the surfer.

2.2.4 Links to other sites

Please be aware that while visiting our site, Visitors can follow links to other sites that are beyond our sphere of influence. Velix.ID is not responsible for the content or privacy policy of these other sites.

2.3 Purchasers

Purchasers should be aware that upon Token purchase, they could be disclosing information that could make them personally identifiable to Velix.ID. The security and privacy protection implemented on Velix.ID's platform does not cover this type of transfer or disclosure of personal information. Purchasers should be aware that they alone are responsible for the content of the information provided.

2.3.1. Inquires

If you wish to inquire about your Personal Data that may have been collected by a Velix.ID, we recommend that you contact us via contact details on info@velix.id

2.4 Users

2.4.1. General

In order to provide services to its Users, Velix.ID collects certain types of data from them.

2.4.2 Collection of User data

During a User's registration and later on Velix.ID's platform, they provide information such as name, company name, email, address, telephone, credit-card number and other relevant data. This information is used by Velix.ID to identify the User and provide them with support, services, mailings, sales and marketing actions, billing and to meet contractual obligations.

Velix.ID Users can at any time access and edit, update or delete their contact details by logging in with their username and password to Velix.ID's platform. Velix.ID Users may create more Users with different privilege levels within their account. It is the responsibility of the User that creates other User accounts, to choose the level of access each User should have. Once these new Users log into Velix.ID, they meet the definition of User in this policy. Velix.ID will not retain User data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

2.4.3 Controller

Velix.ID processes Personal Data both as a Processor and as a Controller.

The Velix.ID entity which you as a User entered an agreement with when using Velix.ID's platform, will be the Controller for User data, as outlined above.

3. Personal data

We may collect and process the following data about you:

- **Data you give us.** You may give us data about you by filling in forms on Website and/or platform or by corresponding with you by phone, e-mail or otherwise. The data you give us may include your name, title, employment records, address, e-mail address and phone number, financial and credit card data, personal description and photograph.
- **Data we collect about you.** With regard to each of the visits to Website and/or platform we may automatically collect the following data:
 - technical data, including the Internet protocol (IP) address used to connect the your computer to the Internet, your login data, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - data about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from Website and/or platform (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction data (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Data we receive from other sources.** We may receive data about you if you uses any of the other services we provide. We are also working closely with third parties (including but not limited to business partners, sub-contractors in technical, payment

and delivery services, advertising networks, analytics providers, search data providers, credit reference agencies) and may receive data about you from them.

Uses made of the personal data

We use data held about you in the following ways:

- **Data you give us.** We will use these data:
 - to carry out our obligations arising from T&Cs and/or any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
 - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you.
 - to notify you about changes to our service;
 - to ensure that content from our Website and/or platform is presented in the most effective manner for you and for your computer.
- **Data we collect about you.** We will use this data:
 - to administer our Website and/or platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our Website and/or platform to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our service, when you chooses to do so;
 - as part of your efforts to keep our website and/or platform safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you and other users of our website and/or platform about goods or services that may interest you or them.
- **Data we receive from other sources.** We may combine these data with information you give us and information we collect about you. We may use these data and the combined information for the purposes set out above (depending on the types of information we receive).

4. Retention and deletion

Velix.ID will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations. For Purchaser data, Velix.ID's Users have control of the purpose for collecting data, and the duration for which the Personal Data may be kept. For Purchaser data, Users with an active account will therefore have the responsibility to delete data when required. When a Users's account is terminated or expired, all Personal Data collected through the platform will be deleted, as required by applicable law.

5. Acceptance of these Conditions

We assume that all Visitors of our website, Purchasers powered by Velix.ID and users of Velix.ID's platform have carefully read this document and agree to its contents. If someone does not agree with this privacy policy, they should refrain from using our

website and platform. We reserve the right to change our privacy policy as necessity dictates. Continued use of Velix.ID website and platform after having been informed of any such changes to these conditions implies acceptance of the revised privacy policy. This privacy policy is an integral part of Velix.ID's terms of use.

6. Our Legal Obligation to Disclose Personal Information

We will reveal a user's personal information without his/her prior permission only when we have reason to believe that the disclosure of this information is required to establish the identity of, to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to Velix.ID or to others who could be harmed by the user's activities or of persons who could (deliberately or otherwise) transgress upon these rights and property. We are permitted to disclose personal information when we have good reason to believe that this is legally required.

7. Velix.ID's Data Protection Officer

Velix.ID has a "Data Protection Officer" who is responsible for matters relating to privacy and data protection. This Data Protection Officer can be reached at the following address:

- Velix.ID
- Attn: Data Protection Officer
- e-mail: info@velix.id

8. Sharing or disclosing personal data

We share your personal data in the following ways:

- Affiliates. Your personal data may be accessible to all our affiliated companies worldwide for the purposes described in this Policy.
- Agents, representatives, vendors, suppliers, sponsors, societies and business partners. Your personal data may be accessible to our agents, representatives, sponsors and entities for which we are acting as an agent, licensee, joint venturer or publisher.
- Service providers. Your personal data may be accessible to our service providers and suppliers, which assist us with producing and delivering our products and services, operating our business, and marketing, promotion and communications. These providers and suppliers include, for example, editors, reviewers, credit or debit card processors, customer support, email service providers, IT service providers, financial services and shipping agents.
- Other third parties. We may share personal data with other third parties if we expressly told you about such potential disclosure at the point at which you submitted the personal data to us.
- Compliance with law and similar obligations. We may share personal data in order to: (i) respond to or comply with any law, regulation, subpoena or court order; (ii) investigate and help prevent security threats, fraud or other malicious activity; (iii) enforce and protect the rights and properties of us or our affiliates; or (iv) protect the rights or personal safety of our employees and third parties on or using our property.
- Change in corporate circumstances. If we the platform, website or a related asset or line of business is acquired by, transferred to or merged with another company, your personal data may be disclosed to the prospective or actual purchasers.
- Your permission. We may also disclose your personal data with your permission.

9. Information security

We have reasonable commercial standards of technology and operational security in place to protect all information provided by users via this website and/or platform from unauthorized access, disclosure, alteration, or destruction.

10. Anonymous data

We may create anonymous data records from personal data by excluding information that make the data personally identifiable to you. We use this anonymous data to analyze request and usage patterns so that we may enhance the content of our Services and improve platform and/or website navigation. We reserve the right to use anonymous data for any purpose and disclose anonymous data to third parties at our sole discretion.

11. Information about our use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

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, use a shopping cart or make use of e-billing services.

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 may 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.

You can find more information about the individual cookies we use and the purposes for which we use them in the list below:

__ga A Google Analytics cookie used to distinguish users and sessions.

__gat A Google Analytics cookie used to determine new sessions / visits.

__gid A Google Analytics cookie used in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.

cookie_notice_accepted Cookie to store your acceptance of cookies

wfvt_ Contains information about your general geographic location. These are known as session cookies and are deleted when you leave the site.

wordfence_verifiedHuman This cookie is used by Wordfence to verify you as a human user, for added security.

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 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. Our Cookie Policy should be read in conjunction with our Privacy Policy and website terms and conditions, which also appear on our website.

12. Purpose of using Cookie

We use cookies on our site for the following general purposes:

- To identify your browser when you return to our site, to record and remember any preferences defined during your previous visit. For example, if you have registered on our site, cookies can allow us to keep your login information, so that you do not have to re-enter your connection information each time.
- To customise your browsing experience and the content on our site. For example, when you visit an internet page, we, our service providers or our partners automatically install a cookie in order to recognise your browser when you access the internet, and thus display information based on what appears to be of interest to you.
- To measure and document the effectiveness of different features, offers and electronic communications (by determining which emails you have opened and whether you clicked on a link in the email).

The Settings option on the toolbar of most browsers should tell you how to prevent your browser from accepting new cookies, how to obtain notification when you receive a new cookie, or how to disable cookies that are not useful to you. Please note that if you refuse cookies, you may not be able to access many of the tools offered by our site.

13. Web beacons

Our site may also use web beacons (also called invisible GIFs or invisible pixels), which are tiny digital images with a unique identifier that work like cookies, and which are placed in the code of a webpage. We use them to understand the browsing patterns of our users who access one page from another page within our site in order to provide or transmit information to the cookies, but also to know if you are accessing our site from an online advertisement displayed on a third party site, and finally, to improve the performance of our site. We may also allow our service providers to use web beacons to help us determine which emails have been opened by their recipients and to track user traffic and actions on our site. We do this so we can better measure the relevance of our content and the effectiveness of our offers.

14. Amendments

We reserve the right to amend or supplement this Policy at any time without warning and notifying you on such amendments and supplements. You undertake from time to time to check this web-page for the purpose of such amendments and supplements' tracking.

The updated Privacy Policy takes effect from the date of its posting unless otherwise provided by the provisions of the updated Privacy Policy.

15. For Further Information

The Privacy Policy is determined and governed by Laws of Singapore.

If you have any further questions regarding the data Velix.ID collects, or how we use it, then please feel free to contact us by email at: infor@velix.id