



OPPORTY tokens sale privacy policy

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SECTION 1. PRIVACY POLICY STATUS AND ACCEPTANCE

1.1. This Privacy Policy (henceforward referred to as the “Policy”) formulates the general rules of User’s Personal Data collection, processing, distribution, use and keeping by the Website Owner.

1.2. Throughout this Policy, we use the term “Personal Data” to describe the amount of information that can be correlated with a specific person (the User) and can be used to identify that person (including the information about Your activities, such as information about Your use of the Website, when directly linked to personally identifiable information, including automatically assembled). We do not consider Personal Data to include information that has been anonymized so that it does not identify a specific User.

1.3. This Policy is an integral part of Opportunity Tokens Sale General Terms & Conditions. In terms not regulated by this Policy, the Opportunity Tokens Sale General Terms & Conditions shall apply to the relationships that appear henceforth.

1.4. The definitions set forth herein and mentioned with a capital letter shall have the meaning as described in Opportunity Tokens Sale General Terms & Conditions.

1.5. Each User must carefully read and abide this Policy.

1.6. It is implied and assumed per se that by the fact of the Website use and Opportunity Tokens purchase or by providing Us with the Personal Data directly on our request, the respective User has fully read, understood and accepted this Policy. If any User does not agree with this Policy in general or any part of it, this User should refrain from using the Website and/or of Opportunity Tokens acquisition.

SECTION 2. PERSONAL DATA COLLECTION, PROCESSING AND USE

2.1. The purpose of personal data accumulation, storage and processing within the Opportunity project shall only be the identification of the Opportunity Token purchaser/participant of the Opportunity Tokens Sale.

2.2. We gather Personal Data from running the Website and use Personal Data, provided to Us by You. When You visit the Website or use our products, We collect the Personal Data sent to Us by Your computer, Your smartphone, or other access device. This Personal Data includes:

- Your IP address
- Device information including, but not limited to, identifier, name, and type, operating system
- Mobile network information
- Standard web log information, such as Your browser type, and the pages You accessed on Our Website. When You use a location-enabled device with Our Website and products, We may collect geographical location data or use various means to determine the location, such as sensor data from Your device that may, for example, provide data on cell towers nearby and Wi-Fi access spots. However, we will not release Your strict personal information that allows for identification to any third party without Your consent, except as set forth herein.

2.3. If You create an Account on our Website, We collect and store the following types of Personal Data about You:

- Your name
- Your address
- Your email and phone number

2.4. In certain cases (when according to Government Regulations additional verification by bank or compliance authority is necessary) We may require additional information from You, namely the following:

- Date of birth;
- Passport or driver license details;
- Numbers that You may use or have registered with Your local tax authority;
- Utility bills;
- Your Photographs;
- Sources of Income confirmation;
- Sworn statements. The abovementioned information and details shall be provided only upon special personal request and specified in respective email.

2.5. We keep Our right to request basic Personal Data, described in clause 2.4., prior to activating Your Account on the Website and/or any services available through the Website. We may refuse You access to our services and Website should We have grounded doubts as to the validity, authenticity and genuineness of the Personal Data provided by You.

2.6. If You do not provide Us with the Personal Data as specified in clauses 2.3., 2.4. hereof, You shall not be able to use the full functionality of the Website and hold the balance of Opportunity Tokens and/or use the Opportunity platform. We shall not bear any liability for such possible incomplete use.

2.7. When You access the Website or use Our products or services We (or Google Analytics, or a similar service provider on our behalf) may place small data files called cookies on Your computer or any other device you use. We implement these technologies to recognize You as our User, customize Our Website and advertising, measure promotional efficacy and collect information about Your computer (as described in clause 2.2. hereof) or other access device to alleviate risk, prevent fraud, promote trust and safety. You may control the use of cookies within Your Internet browser settings. If you reject or delete certain cookie files, be aware that our Website's related features and functions and services performance may be impaired.

2.8. You agree to provide the Personal Data specified here and further on and agree that Personal Data You provided may be processed and stored by Us or Our counterparties (as specified in clause 3.4. and further on) during the period of time that is practically

necessary to fulfill the aims and purposes of Opportunity Tokens Sale as set forth in the Whitepaper.

2.9. We only collect the Personal Data that is required for proper use of the Website or for Opportunity Tokens purchase from our Users. We use Your Personal Data to particularly:

- Administer Our Website and provide services;
- Develop new products and services;
- Personalize Our Website for You;
- Send You technical notices and support and administrative messages;
- Communicate with You about products, services, promotions, events and other news and information we think will be of interest to You;
- Monitor and analyze trends, usage and activities in connection with Our Website and services;
- Provide third parties with statistical information about Our Users (no identification ability);
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Website Owner and others;
- Link or combine Personal Data We collect from or about You; and
- Verify compliance with the terms and conditions governing the use of Our Website (including monitoring private messages sent through the Website private messaging service).

2.10. The Website Owner is the only data controller and processor, except for the cases when there is an objective Website Owner's need to control/process or store Personal Data at Website Owner's counterparties or agents. If a counterparty of this kind or agent have a need to be engaged by the Website Owner, we shall notify You in advance.

2.11. You may access, review and edit Your Personal Information at any time by logging in to the Website using Your credentials.

2.12. You have the right to require the deletion of Your Personal Data provided by You to Us or claim/revoke your consent for collection, processing and storage of Your personal data by Us at any time. If You decide to do so, You should send the respective notification using Your Account on the Website or via User contact form on the Website.

We shall delete Your respective Personal Data from any sources within 24 hours from the moment We receive the request from You. The Website Owner reserves the right to suspend provision of any services to You referring to Opportunity project and/or delete Your Account on the Website without prior notice or compensations of any kind.

2.13. We do not intend to publish any Opportunity Tokens purchase related Personal Data without Your prior written consent.

SECTION 3. PERSONAL DATA PRESERVATION AND DISTRIBUTION

3.1. We will make every effort provided by Applicable Law to keep all of Your Personal Data secret.

3.2. We store and process Your Personal Data on Our servers in numerous locations. By submitting Your Personal Data, You agree to the fact of its transfer, storage and processing. We will take all reasonable required measures to ensure Your Personal Data security. We protect Your Personal Data in accordance with internationally recognized standards by application of physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards We use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. We authorize Personal Data access only if it is required for service responsibilities fulfillment. All of our physical, electronic, and processing safeguards are designed to comply with applicable laws and regulations. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent. From time to time, Personal Data may be also stored in other locations. In this case We ensure that Personal Data is stored and processed at reasonable levels of care and security.

3.3. Due to certain security checks from Our trusted partners, we are required to compare Your Personal Data to third party databases in order to verify its accuracy and confirm Your identity. This allows Us to comply with relevant anti-money laundering regulations and "know your customer"(KYC) regulations.

3.4. We will not share Your Personal Data with any third parties other than Our respective identity verification partners. We reserve our right to share Your Personal Data with:

- Our banking and brokerage partners;
- Companies that We plan to merge with or be acquired by (should such a combination occur, We will notify You and will require that the newly combined entity follows these terms with respect to Your Personal Data);
- 3rd party identification service providers for fraud prevention purposes;
- Law enforcement, government officials, or other third parties (when We are compelled to do so by a subpoena, court order, or similar legal procedure);
- We believe in good faith that the disclosure of Personal Data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of Our policies;
- Our Personal Data processing counterparties or agents, hired by or cooperating with, whose services are required by us from the practical point of view;
- Other third parties with Your prior consent or direction to do so.

3.5. We will not provide Your Personal Data to any other Website users or third parties other than described in clause 3.4. herein without Your consent or direction to do so.

3.6. We will not sell or rent Your Personal Data to third parties.

3.7. We may combine Your Personal Data with information we collect from other companies and use it to improve and personalize the Website and our products, as well as our content and advertising.

3.8. We may use Your name and email address to provide You with information about products or services that may be of interest to You. Your Personal Data will be used according to the set of applicable laws or with your consent.

3.9. Our services may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If You follow a link to any of these websites, please note that these websites and any services that may be accessible through them have a Privacy Policy of their own and that We do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or

services, such as contact information and location. Please check these policies before You submit any personal data to these websites or use these services.

SECTION 4. DATA KEEPING

4.1. In accordance with Applicable Law and in the need to provide services to Our Users, We may hold Your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain Your Personal Data for as long as Your account is active. Moreover, Your Personal Data may be held beyond the abovementioned period until it is indispensable for Us to have relevant information with respond to any issues that may arise later.

SECTION 5. SECURITY

5.1. We use relevant electronic and processing safeguards to protect the privacy of the information You provide from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not totally secure. Please note that We are not liable for the security of any data You are transmitting over the Internet, or third party content.

SECTION 6. CORRECT/UPDATE/DELETE PERSONAL DATA

6.1. You have the right to access Your Personal Data and to require the correction, updating or deletion of incorrect or/and inaccurate data by means of a contact form on the Website. This request must still comply with Opportunity Tokens Sale General Terms & Conditions and Our legal obligations.

SECTION 7. AMENDMENTS

7.1. The Website Owner reserves the right to modify or amend this Policy at its own discretion. Your continued usage of the Website and/or services shall mean Your acceptance of those amendments.

SECTION 8. CONTACT

8.1. If You have questions concerning this Privacy Policy, please feel free to send us the respective message using the respective contact form on the Website.