

BARTERCHAIN PRIVACY POLICY

The following Privacy Policy ("Privacy Policy") applies to every use of the Application (as defined below). This Privacy policy is made by **Barterchain Limited**, having its registered office at Connaught House, 1 Burlington Road, Dublin 4, Ireland (VAT number: 4029993WH) (referred to as " Barterchain" or "we", "us", "our", "ours").

For the purposes of this Privacy policy, we are the **Data Controller**.

Introduction

We are committed to protecting the privacy of every user of Barterchain.

We want to stress that, as a pure intermediary, our mission, when collecting data, is philanthropic, to provide users the best experience possible.

Barterchain is an online platform (through website and application) which connects users with the intention of bartering services with each other.

Barterchain's Service operation and features are explained in depth in the Barterchain Terms and Conditions, which the user accepts when joining the platform.

Barterchain's Service can be called, to the extent of this Privacy policy, as "Barterchain" or as the "Service" or as the "Application".

The purpose of this Privacy policy is to inform you about:

- the **types** of information we collect about you,
- **how we may use** that information,
- **how we may disclose** it to third parties.

Please note that this Privacy policy **does not apply to** information you provide directly to, or that is collected by, third parties that you access through the Application, which are controlled by those third parties and whose use may be governed by different privacy policies and/or terms of use.

As a consequence, it is your responsibility to check out the applicable privacy policies and/or terms of use.

1. ESSENTIAL DEFINITIONS

- **"Adequate Jurisdiction"**: a jurisdiction that has been formally designated by the European Commission as having an adequate level of protection for Personal Data.

- "**Application**": the embeddable, downloadable and/or executable Barterchain software application owned by us.
- "**Content**": any audio or video elements as well as any ideas offered by us or third parties, including but not limited to data, film, video, photographs, software, games, graphics and design elements, portraits and images, artistic works, music, sound, information and other services and materials, tangible and intangible, including derivative works, in any and all media and formats, existing or future.
- "**Data Controller**": the entity that decides if how and why to Process Personal Data.
- "**Data Protection Authority**": the independent public authority formally charged with overseeing and ensuring compliance with existing and applicable data protection regulations.
- "**EEA**": the European Economic Area.
- "**Materials**": all Content, Subscribed Content (where applicable and as better defined below), messaging, blogging, chatting, social networking, information, advertising and/or Internet links, etc., accessible or delivered through the Application.
- "**Personal Data**": information about a natural person or information from which a natural person is directly or indirectly identified or identifiable, in particular by reference to an identifying element such as a name, an identification number, geographic locations, online identifiers or by reference to one or more physical, psychological, genetic, mental, economic, cultural or social elements that identify a particular natural person.
- "**Processing**": any operation performed on Personal Data even without the use of electronic means, such as collecting, recording, organizing, storing, processing, modifying, retrieving, consulting, using, communicating, disseminating, or otherwise making available, interconnecting, reducing, erasing, and destroying Personal Data.
- "**Sensitive Data**": any personal data relating to race or ethnicity, political opinions, religious or philosophical beliefs, party or trade union memberships, physical and mental health, sexual habits, judicial information relating to adjudicated or pending criminal proceedings, national identification number, or any other information likely to be considered sensitive under applicable law.
- "**Site**": each and every website operated or maintained by us or on our behalf.

- **"Standard Contractual Clauses"**: model transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.
- **"Subscribed Content"**: any and all content subscribed to, uploaded or "posted" by you, on your behalf, or by other users on or through your Product or Smart Services.

2. COLLECTION OF PERSONAL DATA

Collection of Personal Data:

we may collect Personal Data about you from the following sources:

- **Data you provide**: we may obtain Personal Data about you when you provide it to us (for example, when you contact customer service by email or telephone or otherwise).
- **Data collected during the Relationship**: we may collect or obtain Personal Data about you in the normal use of our platform (for example, if you use a product or service from us).
- **Data you make public**: we may collect or obtain Personal Data about you that you manifestly decide to make public, including through social media (for example, we may collect information from your social profile(s) if you write a public "post").
- **Registration Data**: we may collect or obtain Personal Data about you when you download or use the Barterchain platform (website or app).
- **Data in connection with the Site**: we may collect or obtain Personal Data about you when you visit our website or use one of our features or resources available on or through the Site.
- **Registration Information**: we may collect or obtain Personal Data about you when you use, or register to use, the Application.
- **Information in connection with Content and advertisements**: should you choose to interact with third-party content or advertisements as part of your use of the Application, we may receive Personal Data about you either directly or from the third parties providing contents or advertisements.
- **Information from third parties**: we may collect or obtain Personal Data about you from third parties that provide it to us, including third parties that provide contents or advertisements.

- **Creation of Personal Data:** we may also create Personal Data about you, such as records of communications between us, and information regarding your viewing and services history.

3. CATEGORIES OF PERSONAL DATA WE MAY PROCESS

We may process the following categories of Personal Information about you to the extent that such processing is strictly necessary in relation to the processing purposes defined in this Privacy policy (by way of example rather than as an exhaustive list):

1. **Personal Information:** first name(s); surname(s); nicknames; ID verification; profile photo; work experience; studies; bio.
2. **Demographic information:** gender; date of birth/age; nationality; language preference.
3. **Contact information:** address; location; phone number; email address; password; IP address; information from your profile; rates; searching ; history services.
4. **Service information:** category/subcategory services; record of services; searching; history service
5. **Data in relation to the Sites and the Application:** settings; IP address; language settings; date and time; Application usage statistics; Application settings; date and time of connection to the Application; location data, and other information related to technical communications; username; password; security information at login; usage data; aggregate information for statistical purposes.
6. **Content and advertising data:** records of your interactions with our online advertising services and Content, records of advertisements and Content shown on pages or on the Application visible to you on the screen, and any interaction you may have had with said Content or advertisements.
7. **Views and Opinions:** any views or opinions you choose to submit to us (for example, through polls or voting, filling out feedback forms, or rating made on the Application in third-party digital application purchasing platforms) or "posted" publicly on social media.
8. **Non-Personal Data:** when you use Barterchain, we may also collect information that, by itself or in combination with other similar information, cannot be used to personally identify you, or to contact you personally ("Non-Personal Data"). Non-Personal Data also includes technical information about your use of the Application.

9. **Personal Data of children under the age of eighteen (18).**

We are committed to the protection of Children's Personal Data and recognize that parents, guardians, or other adults may swap a service or talent in the interest of family or in the interest of minors.

In some cases, when it's not specified who will benefit from the service, particularly where information is collected electronically, we may not be able to determine whether the information was collected from children under the age of eighteen (18) and we will treat such information as if it had been provided by an adult.

In the event that we are informed that a child under the age of eighteen (18) has provided Personal Data, we will use reasonable efforts to remove such information.

We encourage parents and guardians to participate in all of their children's online activities and to prevent them from providing Personal Data to us through the Application.

We expressly disclaim any liability or claim in connection with the use, or misuse, of said features by children in violation of this Privacy policy.

10. **Cookies and Other Tracking Technologies.** At times, the Service or Application may use "cookies" or other technologies (such as browser cookies, flash cookies, and web beacons). A "cookie" is a small data file placed inside the Product and stored locally within the Product. These technologies help us better understand user behaviour, provide us with information about the Services you have viewed or accessed, and help us make your experience with the Application more useful and personalized. In addition, "cookies" and other technologies may be used to collect information about your online activities over time and on third-party websites and services. Please refer to Section 9 of this Privacy policy: "YOUR RIGHTS AND CHOICES" for information on how you can disable said tracking technologies.

4. **LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

In processing your Personal Data with reference to the processing purposes defined in this Privacy policy at Section 6, we may refer to one or more of the following legal basis, depending on the circumstances:

- **Consent:** we may process your Personal Data when we have obtained your prior, express consent to Processing (this legal basis is used only with respect to Processing that is entirely voluntary - it is not used for Processing that is necessary or in any way mandatory);
- **Contractual requirements:** we may Process your Personal Data where the Processing is necessary in connection with a contract you may enter into

with us;

- **Compliance with applicable law:** we may Process your Personal Data where Processing is required by applicable law;
- **Fundamental interests:** we may Process your Personal Data where the Processing is necessary to protect the fundamental interests of an individual; or
- **Legitimate interests:** we may Process your Personal Data where we have a legitimate interest in proceeding with the Processing for management, operational or promotional purposes of our business and where that legitimate interest is not outweighed by your interests, fundamental rights or freedoms.

5. SENSITIVE DATA LEGAL BASIS

We do not intend to collect or otherwise process your Sensitive Data in the normal course of our business. If, for whatever reason, it becomes necessary to process your Sensitive Data, we refer to one or more of the following legal basis:

- **Compliance with applicable law:** we may Process your Sensitive Data where processing is required or permitted by applicable law;
- **Detection and prevention of a crime:** we may process your Sensitive Data where the Processing is necessary for the detection and prevention of a crime (including the prevention of fraud);
- **Establishment, exercise, or defense of a right:** we may process your Sensitive Data where processing is necessary for the establishment, exercise or defense of a right; or
- **Establishment, exercise, or defense of legal rights:** We may process your Sensitive Personal Data where the processing is necessary for the establishment, exercise, or defense of legal rights; or
- **Consent:** we may process your Sensitive Personal Data where we have obtained, in accordance with applicable law, your prior, express consent to the processing of your Sensitive Personal Data (this legal basis is used only with respect to processing that is entirely voluntary - it is not used for processing that is necessary or in any way mandatory).

6. HOW WE USE THE INFORMATION WE COLLECT (THE PROCESSING PURPOSES)

We may process your Personal Information for the following purposes:

- **Provision of Materials:** providing you with promotional materials at your request, communicating with you in connection with such products or services, operating and managing the Sites and Application, providing you with Content, displaying advertisements or other information to you, communicating, and interacting with you through the Sites and Application.
- **Operation of the Application:** providing and maintaining services in connection with the Application, operating the Application (including the Processing of searches or requests for certain Services, Suggested Services, provided blogs, open forums, discussion pages, and customized features).
- **Communications with you:** communications with you through any means (including email, telephone, text messaging, social media, postings or in person) regarding new items and other information with respect to which you may be interested, subject to such communications being provided to you in accordance with applicable law; maintaining or updating your contact information where appropriate; and subject to obtaining your prior consent on the "**opt-in**" decision where required.
- **IT communications and operations:** management of our communications systems, IT systems security operations; IT security audits.
- **Health and safety:** health and safety assessments and record keeping, compliance with relevant legal requirements.
- **Financial management:** sales; finance; corporate controls; vendor management.
- **Surveys and voting:** confrontation with you to get your opinion about our products and services.
- **Investigative activities:** detection, investigation and prevention of regulatory violations and crimes in accordance with applicable law.
- **Legal proceedings:** creation, exercise, and defense of rights.
- **Compliance with the law:** compliance with our legal and regulatory obligations in accordance with applicable law.
- **Improvement of the Sites and Application:** identifying problems with the Sites and Application; planning improvements to the Sites and Application.
- **Non-Personal Data:** We may use Non-Personal Data for our internal purposes. We reserve the right to use or disclose aggregate and/or Product-specific Non-Personal Data in any manner we deem appropriate, including for our own, our partners' and other third parties' marketing and advertising purposes, and you acknowledge and consent to this. We may also use diagnostic data (which does not identify you and does not contain Personal Data) to improve the Application.

Combination of Information.

We may combine Personal Data and Non-Personal Data collected to provide and improve the services offered. From time to time, we may also, transfer or combine Personal Data collected off-line with our online databases or electronically store information collected off-line. We may also combine Personal Data collected online with information made available from other sources, including information received from our affiliates, marketing or advertising companies. If we combine Non-Personal Data with Personal Data, the information so combined will be treated as Personal Data in accordance with this Privacy policy for as long as the same data remains combined.

7. HOW WE SHARE AND DISCLOSE INFORMATION

We can share the information indicated in this Privacy policy. This section describes how we share that information. We will disclose your Personal Data only and to the necessary extent:

- to comply with applicable law;
- to create, exercise or defend our rights;
- to the extent necessary in connection with the sale or reorganization of a substantial part of our business.

Personal Data and Non-Personal Data. We may share Personal Data and Non-Personal Data as follows:

- With our and our affiliates' staff, employees, contract counterparties, agents, to help us provide or improve services related to the Application.
- With our professional consultants.
- With third parties and their related advisors in connection with mergers, acquisitions, bankruptcy, dissolution, reorganization, total or partial sale of Barterchain's assets, financial activities, total or partial disposal of our assets, or similar transactions or procedures, as well as activities preliminary thereto (for example, due diligence).
- Where required or permitted by applicable laws and regulations.
- With any party relevant to the prevention, investigation, detection or action with respect to crimes or in execution of criminal convictions, including protection against and prevention of threats to public safety.
- With any relevant party, guarantor authority or court, to the extent necessary for the establishment, exercise and defense of rights.

- With public or private authorities, upon request, i.e., for the purpose of reporting any actual or potential violations of applicable laws and regulations.
- With carefully selected third parties, including suppliers or business partners, where necessary to provide a service to us or to perform a function on our behalf in connection with the Application. Any disclosure by us of your Personal Data to a carefully selected third party or to any third party mentioned in this Privacy policy, we will comply with data protection legislation, ensuring that the third party has put in place all measures to keep your data secure, does not use your Personal Data for purposes other than and in addition to those specified by us and in accordance with our purposes set out in this Privacy policy.
- With other third parties solely at your discretion and with your express consent and for the purposes you request.

8. THIRD PARTY MATERIALS, SERVICES, APPLICATIONS AND ADVERTISING

Third parties that offer Applications, Services or Materials on the Application may collect Personal Data or Non-Personal Data when you access their Applications, Services and Materials. We are not responsible for the data collection and privacy policies in use by such third parties or their services, and they may collect data about you and may share it with us and/or others. Third parties and their services may also track you over time and space, submit their own advertisements (including "interest-based" advertisements) to you, and may or may not have published privacy policies of their own.

In addition, as you use the Application you may be directed to other services that are provided and controlled by third parties and that we do not control. For example, if you browse the Internet and "click" on a link on one website, the link may take you to a different website. We encourage you to note when you access a new website or application and to review the privacy policies of all third parties involved and pay attention in connection therewith. We are not responsible with respect to the availability, completeness and accuracy of such third parties' privacy policies or disclosures.

9. YOUR PREFERENCE TO THE COLLECTION OF DATA AND THE MODIFICATION OF EXPRESSED PREFERENCES - YOUR RIGHTS AND CHOICES

Accuracy of data

We undertake to make every reasonable effort to ensure that:

- your Personal Data processed by us is accurate and, where necessary, kept up to date; and
- any and all of your Personal Data processed by us that is inaccurate (having regard to the purposes for which it is processed) is deleted or amended without delay.

From time to time, we may ask you to confirm the accuracy of your Personal Data.

Non-excessive data

We undertake to make every reasonable effort to ensure that your Personal Data processed by us is limited to that which is strictly necessary in relation to the purposes set out in this Privacy policy.

Data Retention

We undertake to put in place all reasonable efforts to ensure that your Personal Data processed by us is Processed for only the minimum period necessary in relation to the purposes set out in this Privacy policy.

The criteria for determining how long your Personal Data is retained are as follows: we will retain copies of your Personal Data in a form that permits identification only for as long as necessary in connection with the purposes set forth in this Privacy policy, unless applicable law requires a longer period of retention of your Personal Data. In particular, we may retain your Personal Data for as long as necessary to create, exercise or defend a right of ours.

Your Rights

In relation to applicable law, you may have rights with respect to the Processing of your Personal Data for which we are the Data Controller, which include:

- the right not to provide us with your Personal Data (however, please note that in such a case we may not be able to provide you with all the Services that you request if you do not provide us with your Personal Data);
- the right to request access to, or copies of, your Personal Data, together with information related to the nature, Processing, disclosure of such Personal Data;
- the right to request rectification of any inaccuracies in your Personal Data;
- the right to request information about the legitimate basis;
- the deletion of your Personal Data;
- the limitation of the Processing of your Personal Data;

- the right to object, on legitimate basis, to the processing by us or on our behalf of your Personal Data;
- the right to obtain certain transfers of Personal Data to other Data Controllers, in a structured, practically used and digitally readable format, within applicable purposes;
- where we process your Personal Data on the basis of your consent, the right to withdraw your consent (provided that such withdrawal does not invalidate any Processing lawfully carried out prior to the date on which we receive notice of such withdrawal nor prevent Processing of your Personal Data done in reliance on any other legal basis);
- the right to lodge complaints before a Data Protection Authority in connection with the Processing by us or on our behalf of your Personal Data.

The above is without prejudice to your non-derogable rights.

Should you wish to exercise any of the above rights, please contact us through our dedicated e-mail address info@barterchain.io

In this regard, please note that:

- we may require proof of your identity before granting effect to the aforementioned rights invoked;
- if your request involves the ascertainment of additional facts (for example,, a determination with respect to the non-compliance of certain processing with applicable law) we will evaluate your request in a reasonably short time before deciding what action to take.
- If we receive a valid request to grant effect to any of the foregoing invoked rights, we will make every reasonable effort within one (1) month or, to the extent permitted by applicable law, as soon as reasonably practicable.

Should you request removal of your Personal Data, you acknowledge that your Personal Data may continue to exist in a non-deletable form that would be difficult or impossible for us to locate, and that for file storage purposes, we reserve the right to retain any information removed from, or changed in, our active databases for non-commercial purposes including dispute resolution, problem resolution and enforcement of this Privacy policy.

The above rights do not apply to our collection of Non-Personal Data. We reserve the right to deny processing of data removal requests that are impractical or that affect the privacy of others. Refusal to Process data removal requests must be justified by applicable law.

All users of the Application are required to provide true, correct, complete and accurate Personal Data when requested, and we will reject and delete any data that

we in good faith believe to be incorrect, false, falsified or fraudulent, or inconsistent with, or in violation of the Privacy policy.

Cookies

Our website uses different types of cookies each of which has a specific function, as indicated in the Cookie policy.

10. SECURITY OF THE INFORMATION WE COLLECT

We take the security of your Personal Information seriously. We maintain physical, administrative, and organizational protections designed to preserve the confidentiality and security of your Personal Data. Unfortunately, the transmission of information over the Internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted through your use of the Application. Any transmission of Personal Data is at your own risk. We are not responsible for circumventing all privacy settings or security measures for the Application.

11. BOARDS AND OTHER PUBLIC SPACES

We may offer boards or other public features on the Application, and any of your "posts" in those public spaces are considered public information that is available to other users.

We do not control, and are not responsible for, the actions of other users of the Application with respect to any information you "post" in such spaces. In addition, information you release in public spaces may be collected and used by other users to send unsolicited messages to you and for ulterior purposes.

Any "postings" to bulletin boards and public spaces on the Application are governed by the terms and conditions of the applicable third-party websites. Portions of your user profile may also be available to other users, and you should take care not to use Personal Data in your user name or other information that may be publicly available to other users.

12. TRANSNATIONAL TRANSFER OF INFORMATION

We may transfer and store Personal Data that you provide to us in connection with your use of the Application on servers located in countries outside your jurisdiction. We may also transfer Personal Data collected from you in other countries outside your jurisdiction to Barterchain or to third parties mentioned in this Privacy policy to the extent such transfer is necessary for the purpose of fulfilling our obligations under this Privacy policy.

Where we transfer your Personal Data from the EEA to recipients located outside the EEA who are not in an Adequate Jurisdiction, we do so on the basis of Standard

Contractual Clauses. You may make a request for a copy of our Standard Contractual Clauses using the contact information provided in Section 9 ("Your Rights") of this policy.

13. PRIVACY POLICY VERSIONS AND AMENDMENTS

We reserve the right to amend this Privacy policy at any time and for any reason, and we will post any amendments to this Privacy policy within a reasonable time after they become effective. This Privacy policy will remain in full force and effect for as long as you remain a user of the Product, even if your use of, or participation in, a particular service, feature, function, or promotional activity, terminates, expires, ceases, is suspended or disabled for any reason.

14 CONTACT US.

Please feel free to direct any further questions you may have with respect to this Privacy policy to the e-mail address: info@barterchain.io

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