

Privacy policy

Neuromation OÜ (**Neuromation**) has created the following privacy policy (the **Policy**) to commute to you clearly and conclusively how Neuromation processes (including collection, use, transferring, storage, deletion, etc.) your personal information. This Policy informs you of your rights as a data subject. This Policy is an integral part of the agreements between you and Neuromation.

Neuromation is a controller of your personal data. Neuromation processes personal data in accordance with applicable law, including the 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/EC (the **GDPR**).

Please read the Policy carefully prior to submitting the data, use of Neuromation platform services or concluding contracts with Neuromation.

If you cannot find the answers you're looking for in our Policy or have any other questions regarding your personal data, please do not hesitate to contact Neuromation using the following contact information:

Name: Neuromation OÜ
Office: Kai 1-5M, Tallinn, 10111 Estonia
E-mail: support@neuromation.io

1. WHAT KIND OF PERSONAL DATA DOES NEUROMATION COLLECT?

- 1.1 **The data requested in connection with the Neurotoken (NTK) sale:** the first and last name and e-mail address. We may, however, request you to provide us with more detailed personal data during anti-money laundering (AML) and know your customer (KYC) checks, such as a copy of your ID or a passport.
- 1.2 **The data required in the course of the registration on the Neuromation platform:** your first name, e-mail address and password.
- 1.3 **Optional data provided in the Neuromation platform account settings:** your last name, Ethereum (ETH) or NTK Wallet address and your profile photo.
- 1.4 **Market transaction data:** token amount, wallet address, date of any transfer and a description of the content of the transfer, including the amount, currency used, and the account number used for the transfer.

2. HOW DOES NEUROMATION COLLECT PERSONAL DATA?

- 2.1 We collect your data when you:
 - (a) become a contributor during the sale of NTK's;
 - (b) sign up and use our platform at platform.neuromation.io;

- (c) subscribe to our mailing lists.

3. WHAT ARE THE PURPOSES OF PROCESSING?

- 3.1 Neuromation is offering NTK-s. In order to acquire NTK, and become a contributor, you have to conclude a contract with Neuromation. Therefore, Neuromation processes your personal data for the performance of the contract and in order to take steps prior to entering into a contract. Neuromation will process your data requested in connection with the Neurotoken (NTK) sale.
- 3.2 In case you sign up at Neuromation platform, Neuromation will process your personal data in order to enable you to use the platform and the services provided therein.
- 3.3 Furthermore, the processing might be necessary for compliance with legal obligations to which Neuromation is subject. For example, Neuromation is required to organise the accounting and financial reporting.
- 3.4 Neuromation will also process your personal data if the processing is necessary for the purposes of the legitimate interests pursued by Neuromation. In every such case Neuromation will consider whether such interests might be overridden by the interests or fundamental rights and freedoms of the data subject. For example, Neuromation has the legitimate interest to process your data to help with fraud identification and prevention.
- 3.5 Neuromation can process your personal data if you have given consent to the processing of your personal data for one or more specific purposes. For example, Neuromation can send you direct marketing offers if you have expressly given such consent. You have the right to withdraw your consent at any time. However, we remind you that the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

4. WHERE WE STORE AND PROCESS PERSONAL DATA?

- 4.1 We process your personal data in the European Union as well as in countries outside the European Union. In case our suppliers process your data in countries which do not provide sufficient level of protection to your rights, we will carefully assess all the circumstances and make sure appropriate safeguards are put in place so that your rights are not in any way undermined. We make sure that conditions to enforce your rights and effective legal remedies are available.

5. HOW LONG WE RETAIN YOUR PERSONAL DATA?

- 5.1 Neuromation has both the right and the obligation to retain the personal data collected for a certain period. Neuromation does not retain personal information longer than necessary to achieve the purposes of processing and comply with the obligations of Neuromation. However, Neuromation may retain the personal data for a longer period if you have given consent for longer storage and processing of the data.
- 5.2 As a rule, Neuromation will keep your personal information for 5 years after you have disposed of all NTK-s.

- 5.3 The information contained in the accounting records will be retained for seven years in accordance with the law.
- 5.4 If Neuromation sends personal information to another controller, the data retention periods will be determined by the recipient of the data.

6. TO WHOM AND WHY WE TRANSFER YOUR PERSONAL DATA?

- 6.1 Neuromation discloses personal information only to the extent and in the form necessary for the fulfilment of the purposes listed in the Policy.
- 6.2 Neuromation may transfer your personal data to other data controllers or processors. Neuromation may share information with companies that provide support services to Neuromation (e-mail, marketing). These companies may need information about you in order to perform their functions. Data processors are not authorized to use the shared data for any other purpose. You will find the list of other data controllers and data processors published on our website.
- 6.3 Neuromation is required to transfer personal data if Neuromation is legally bound by such an obligation. For example, Neuromation might be obligated to disclose personal data to public authorities upon their legitimate request.

7. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

- 7.1 You can always opt out of receiving promotional communications any time by following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as technical notices, support or administrative notifications or information about your account.
- 7.2 You have the right to receive information about the personal data processed by Neuromation, including the categories of data processed, the sources of the data, purposes of processing etc. You are also entitled to receive copies and extracts of personal data processed. You have the right to request the correction or updating of data if it turns out that the personal data being processed is inaccurate.
- 7.3 You have the right to obtain from Neuromation the erasure of your personal data. Neuromation will erase your data or implement other measures that result in the data becoming permanently anonymous if:
 - (a) your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - (b) you withdraw the consent on which the processing is based and there is no other legal ground for the processing;
 - (c) you object to the processing and there are no overriding legitimate grounds for the processing;
 - (d) your personal data have been unlawfully processed;

(e) your personal data have to be erased for compliance with a legal obligation to which Neuromation is subject.

7.4 Neuromation will fulfil your request within a reasonable time, but no later than one month after receiving the request.

7.5 You are entitled to lodge a complaint to the supervisory authority. In Estonia the supervisory authority is Estonian Data Protection Inspectorate located at Väike-Ameerika St. 19, 10129 Tallinn and online www.aki.ee.

8. CHANGES TO THIS POLICY

8.1 Any revisions to this Policy will be posted on the Neuromation website. We recommend to periodically visit our website to review any changes that may be made to this Policy. If you continue to use our website and services, it constitutes your agreement to be bound by this Policy and any possible changes.

This Policy was last updated on 25 July 2018.