



Privacy Policy

Last updated: 13 June 2018

This privacy policy ("**Privacy Policy**") describes how we, the qiibee foundation (CHE-177.987.779), Gotthardstrasse 26, 6300 Zug, Switzerland ("**qiibee**", "**we**", "**our**" or "**us**"), collect and further process personal data. This Privacy Policy is not necessarily a comprehensive description of all our data processing. It is possible that other privacy policies are applicable to specific circumstances.

TABLE OF CONTENTS:

1. Who we are and how to contact us	2
2. Personal data we collect and process	2
3. How we process and use your personal data	3
4. How we use Cookies / Tracking and other techniques on our Website	5
5. Where we transfer personal data to	6
6. How we retain your personal data	7
7. How we keep your personal data secure	7
8. Obligation to provide personal data to us	7
9. Your rights	8
10. How this Privacy Policy may be updated	9

1. WHO WE ARE AND HOW TO CONTACT US

The controller of the data processing as described in this Privacy Policy (i.e. the responsible person) is the qiibee foundation, Gotthardstrasse 26, 6300 Zug, Switzerland. You can notify us of any data protection related concerns via mail at our address or using the following e-mail address: welcome@qiibee.com.

2. PERSONAL DATA WE COLLECT AND PROCESS

Your privacy is important to us. At qiibee, we follow the following fundamental principles:

- Unless required by applicable law or regulation, we do not ask you for personal data (as defined below).
- However, qiibee may collect your personal data that you provide by using our services (as defined below), by communicating with us or by reporting a bug or other error related to our Services.

“Personal data” in this Privacy Policy means any information that identifies, or could potentially be used to identify you as an individual.

We do our best to minimize the amount of personal data we collect from you. We primarily process personal data that we collect from users when operating the qiibee website

(www.qiibee.com; “**Website**”), the qiibee wallet (web) app (“**Wallet**”), our private blockchain and our other applications and services (together “**Services**”), or that we obtain from participants in a sale, airdrop or similar distribution of our qiibee token (QBX) (together “**QBX Distributions**”). This includes, but is not limited to, any information you are submitting in a registration form, contact form, chat form or similar form on our Website, our wallet (web) app or other applications.

Insofar as it is permitted to us, we obtain certain personal data from publicly accessible sources (e.g., commercial registers, press, internet, social media, public chat groups, public distributed ledgers and public blockchains [such as the Ethereum network]) or we may receive such information from affiliated companies of qiibee, from authorities or other third parties (e.g., companies building their loyalty program based on our Services, providers of services regarding anti-money laundering [AML] regulations and know-your-customer [KYC] checks, self-regulatory organisations). Apart from data you provide to us directly, the categories of data we receive about you from third parties include, but are not limited to, information from public registers, information regarding legal regulations such as AML and KYC restrictions (if you are participating in any QBX Distributions), information about you found in the media or internet (including social media, public chat groups, your transactions on public distributed ledgers and public blockchains [such as the Ethereum network]), data in connection with your use of our websites (e.g., IP address, MAC address of your smartphone or computers, information regarding your device and settings, cookies, date and time of your visit, sites and content retrieved, applications used, referring website, localization data) and data we receive from companies building their loyalty program based on our Services (e.g., your e-mail address, data regarding the earning, redemption and other transactions of cryptographic tokens).

3. HOW WE PROCESS AND USE YOUR PERSONAL DATA

We primarily use the personal data we collect to provide, develop and enhance our Services and any other of our platforms, which is in our (or, as the case may be, any third parties') legitimate interest.

Mainly in the context of QBX Distributions, but also when providing our Services, we use the collected data to conclude and perform contracts with the respective participants of QBX

Distributions and users of our Services, as well as in order to comply with our domestic and foreign legal obligations.

In addition, in line with applicable law and where appropriate, we may process your personal data and personal data of third parties for the following purposes, which are in our (or, as the case may be, any third parties') legitimate interest, such as:

- communication with you as a user of our Services, participant in any QBX Distributions or when you contact us via e-mail, social media, chat groups or similar;
- communication with third parties and processing of their requests (e.g., companies building their loyalty program based on our Services, providers of services regarding AML regulations and KYC checks, self-regulatory organisations);
- advertisement and marketing (e.g., e-mail newsletter, messages on social media and in chat groups), provided that you have not objected to the use of your data for this purpose (if you already receive our e-mail newsletter or other messages, you may object at any time and we will place you on a blacklist against further e-mail newsletters or other messages);
- asserting legal claims and defense in legal disputes and official proceedings;
- prevention and investigation of criminal offences and other misconduct (e.g. carrying out AML and reputational checks, conducting internal investigations, data analysis to combat fraud);
- ensuring our operation, including our IT, and our Services;
- acquisition and sale of business divisions, companies or parts of companies and other corporate transactions and the transfer of personal data related thereto as well as measures for business management and compliance with legal and regulatory obligations as well as internal regulations of qiibee.

If you have given us your consent to process your personal data for certain purposes (for example when registering to receive newsletters or carrying out a KYC check), we will process your personal data within the scope of and based on this consent, unless we have another

legal basis, provided that we require one. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

4. HOW WE USE COOKIES / TRACKING AND OTHER TECHNIQUES ON OUR WEBSITE

We typically use "cookies" and similar techniques on our Website and Wallet, which allow for an identification of your browser or device. A cookie is a small text file that is sent to your computer and automatically saved by the web browser on your computer or mobile device, when you visit our Website or use our Wallet. If you revisit our Website or use our Wallet, we may recognize you, even if we do not know your identity. Besides cookies that are only used during a session and deleted after your visit of the website ("**Session Cookies**"), we may use cookies in order to save user configurations and other information for a certain time period (e.g., two years) ("**Permanent Cookies**"). Notwithstanding the foregoing, you may configure your browser settings in a way that it rejects cookies, only saves them for one session or deletes them prematurely. Most browsers are preset to accept cookies. We use Permanent Cookies for the purpose of saving user configuration (e.g., language, automated log in), in order to understand how you use our services and content. If you block cookies, it is possible that certain functions (e.g., language settings, automated log in) are no longer available to you.

In accordance with applicable law, we may include visible and invisible image files in our newsletters and other marketing e-mails. If such image files are retrieved from our servers, we can determine whether and when you have opened the e-mail, so that we can measure and better understand how you use our offers and customize them. You may disable this in your e-mail program, which will usually be a default setting.

By using our Services and consenting to the receipt of newsletters and other marketing e-mails you agree to our use of such techniques. If you object, you must configure your browser or e-mail program accordingly or refrain from using our Services, should the respective setting not be available.

We may use Google Analytics or similar services on our website. These are services provided by third parties, which may be located in any country worldwide (in the case of Google Analytics Google LLC is in the U.S., www.google.com) and which allow us to measure and evaluate the use of our website (on an anonymized basis). For this purpose, Permanent Cookies are used, which are set by the service provider. The service provider does not receive (and does not retain) any personal data from us, but the service provider may track your use of

the Website, combine this information with data from other websites you have visited and which are also tracked by the respective service provider and may use this information for its own purposes (e.g. controlling of advertisements). If you have registered with the service provider, the service provider will also know your identity. In this case, the processing of your personal data by the service provider will be conducted in accordance with its data protection regulations which we do not control.

5. WHERE WE TRANSFER PERSONAL DATA TO

In the context of the provision of our Services, performance of QBX Distributions and other business activities and in line with the purposes of the data processing set out in Section **Error! Reference source not found.**, we may transfer personal data to third parties, insofar as such a transfer is permitted and we deem it appropriate, in order for them to process personal data for us or, as the case may be, their own purposes. In particular, the following categories of recipients (“**Recipients**”) may be concerned:

- our service providers (in particular qiibee ag, Gubelstrasse 19, 6300 Zug, Switzerland (“**qiibee ag**”); and others such as e.g. providers of services regarding AML regulations and the performance of KYC checks, marketing and PR agencies), including processors (such as e.g. IT providers);
- dealers, suppliers, subcontractors and other business partners;
- companies building their loyalty program based on our Services
- domestic and foreign self-regulatory organisations authorities or courts;
- the public, including users of our Website, Wallet and social media;
- acquirers or parties interested in the acquisition of business divisions, companies or other parts of qiibee or qiibee ag;
- other parties in possible or pending legal proceedings;

Certain Recipients may be within Switzerland but they may be located in any country worldwide. In particular, you must anticipate your personal data to be transmitted to any country in which qiibee is active by affiliates, branches or other offices (see www.qiibee.com) as well as to other countries in Europe and the USA where our service providers are located. If we transfer data to a country without adequate legal data protection, we ensure an appropriate level of protection as legally required by way of using appropriate contracts (in particular on the basis of the standard contract clauses of the European Commission, which

can be accessed [here](#)) or binding corporate rules or we rely on the statutory exceptions of consent, performance of contracts, the establishment, exercise or enforcement of legal claims, overriding public interests, published personal data or because it is necessary to protect the integrity of the persons concerned. You can obtain a copy of the mentioned contractual safeguards at any time from the contact person named under Section 1 above insofar they are not available under the aforementioned link. However, we reserve the right to redact copies for data protection reasons or reasons of secrecy or to produce excerpts only.

6. HOW WE RETAIN YOUR PERSONAL DATA

We process and retain your personal data as long as required for the provision of our Services, the performance of our contractual obligations and compliance with legal obligations or other purposes pursued with the processing, i.e. for the duration of the entire business relationship (from the initiation, during the performance of the contract until it is terminated) as well as beyond this duration in accordance with legal retention and documentation obligations. Personal data may be retained for the period during which claims can be asserted against our company or insofar as we are otherwise legally obliged to do so or if legitimate business interests require further retention (e.g., for evidence and documentation purposes). As soon as your personal data are no longer required for the above-mentioned purposes, they will be deleted or anonymized, to the extent possible. In general, shorter retention periods of no more than twelve months apply for operational data (e.g., system logs).

7. HOW WE KEEP YOUR PERSONAL DATA SECURE

We are committed to making sure your information is protected and have taken appropriate technical and organizational security measures that help keep your personal data safe such as training of our staff, IT and network security solutions, access controls and restrictions, and more.

8. OBLIGATION TO PROVIDE PERSONAL DATA TO US

In the context of any business relationship between qiibee and you (e.g., your usage of our Services or your participation in any QBX Distributions) you must provide us with any personal data that is necessary for the conclusion and performance of a business relationship and the performance of our contractual obligations (as a rule, there is no statutory requirement to provide us with data). Without this information, we will usually not be able to enter into or

carry out a contract with you (or the entity or person you represent). In particular, if you are participating in any QBX Distributions, you will be required to provide any personal data necessary for us to comply with AML regulations and carry out KYC checks. Furthermore, our Services cannot be used unless certain information is disclosed to enable data traffic (e.g. IP address).

9. YOUR RIGHTS

In accordance with and as far as provided by applicable law (as is the case where GDPR is applicable), you may have your personal data rectified or deleted, restrict our processing of that information, and object to the processing of your personal data. In addition you have the right to receive certain personal data for transfer to another controller (data portability). Please note, however, that we reserve the right to enforce statutory restrictions on our part, for example if we are obliged to retain or process certain data, have an overriding interest (insofar as we may invoke such interests) or need the data for asserting claims. If exercising certain rights will cause costs which need to be reimbursed to us by you, we will notify you thereof in advance. We have already informed you of the possibility to withdraw your consent in Section 3 above. Please further note that the exercise of these rights may be in conflict with your contractual obligations and this may result in consequences such as premature contract termination or may involve costs which need to be reimbursed to us by you. If such costs will incur on you, we will inform you in advance unless it has already been contractually agreed upon.

In general, exercising these rights requires that you are able to prove your identity (e.g., by a certified copy of identification documents where your identity is not evident otherwise or can be verified in another way). In order to assert these rights, please contact us at the addresses provided in Section 1 above.

In addition, you have the right to enforce your rights in court or to lodge a complaint with the competent data protection authority provided for by applicable law. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

10. HOW THIS PRIVACY POLICY MAY BE UPDATED

We may amend this Privacy Policy at any time without prior notice. We occasionally review this Privacy Policy to make sure it complies with applicable laws and conforms to changes in our business. The current version published on our Website shall apply. If we do revise this Privacy Policy, we will update the date at the top of this Privacy Policy so that you can tell if it has changed since your last visit and will do our best to notify you. Please review this Privacy Policy regularly to ensure that you are aware of its terms. If the Privacy Policy is part of an agreement with you, we will notify you by e-mail or other appropriate means in case of an amendment.

* * *