



P O Z E S S

P R I V A C Y P O L I C Y

#1 Cryptocurrency Social Fashion Marketplace on Blockchain



POZESS

DISCLAIMER

By accessing, creating an account or by using the services rendered across the Pozess Website, and/or participating to the Pozess Token Sale as defined by this T&C and by the Privacy Policy, you are expressly accepting our terms and conditions of this T&C and that Pozess processing your personal data for the purposes exposed in this Privacy Policy. This Privacy Policy is part of the T&C for this Website, but has its own binding obligations apart from those provided in this document. If you do not agree with any of the terms of this T&C, then please do not use our Website and/or participate to the Pozess Token Sale.



1 INTRODUCTION

1.1 Pozess, Ltd with its business address at New Horizon Building, Ground floor, 3 1/2 miles Phillip S.W Goldson Highway, Belize City, Belize (hereinafter referred to as "Pozess" or "we"), offers via www.Pozess.io and www.Pozess.com (the "Website"), Pozess mobile app services related to buying and selling consumer products and services using cryptocurrency and/or participating on the Pozess Token Sale (also interchangeably known as Token Generation Event, TGE, crowdsale ,ICO and/or Initial coin offering)

By accessing, creating an account or by using the services rendered across the Pozess Website, and/or participating to the Pozess Token Sale as defined by the Terms & Conditions and by the Privacy Policy, you are expressly accepting our Terms & Conditions (T&C) and that Pozess processes your personal data for the purposes explained in this Privacy Policy. This Privacy Policy is part of the T&C for this Website, but has its own binding obligations apart from those provided by Point I. If you do not agree with any of the terms of this ToS, then please do not use our Website and/or participate to the Pozess TGE.

This Privacy Policy explains how personal data are processed by Pozess if a person uses Pozess's services, the Website or otherwise interacts with Pozess (such person hereinafter called "Customer"). Only persons of legal age are permitted to use the website and to register to it.

1.2 Pozess is the controller and responsible person for the personal data processed via the Website. Pozess is aware that the protection and careful handling of the Customer's personal data are very important. Pozess will solely use the personal data provided by the Customer in compliance with the applicable data protection requirements, this Privacy Policy and the consent of the Customer.

1.3 The Customer is obliged to keep his personal data correct and up to date.

1.4 The Privacy Policy is drafted in English.

2 PERSONAL DATA CATEGORIES AND THEIR USAGE

2.1 When using Pozess's services or interacting with Pozess the following personal data are processed:

(a) Contact data: e.g. when creating a new user account or communicating with Pozess (i.e. name, address, telephone number, email, birthdate, password in encrypted form) and country.

(b) Verification data: when an account is verified (i.e. screenshots of national identity documents, like passport, driving license ID card, national identification number and identification data from these documents, utility bill details for residence verification)

(c) Financial data: in the course of purchase and sale transactions (i.e. bank details payment service provider information, payment details, wallet address, transaction-ID).

(d) Log data: during activities on the Website, (i.e. IP-address, transaction data, deposit and withdrawal address, computer or mobile device information, IP-address, operating system, browser type, device type, unique device identification number).

(e) Company details if a business account is requested (i.e. commercial register report, data of or concerning beneficial owners, records or additional information on recent, past or planned business activities, other data necessary to determine/validate the structure, the beneficial ownership or any power of attorney of the company).

(f) Details to and proof of funds: i.e. banking statements or any other details provided by banks or financial institutions, contracts of sales or contracts in general, or any other suitable data to prove or determine the origin of funds, if exceeding the daily/monthly or general limits on Pozess. In order to determine Customer's purpose for using the above-mentioned services additional information on recent, past or planned business or personal activities of business or private Customers or other data to determine the Customer's intentions, if necessary, can be processed, as requested by Pozess or provided by the Customer.

(g) Personal data provided to the support team when the Customer submits a request to Pozess's support team or any other member of the Pozess team.

(h) Location Information: we collect different types of information about your general location (e.g. IP address) and provide information that is more specific if the localization function in the settings menu of your mobile device is enabled;

(i) Usage Information: we collect information about your actions, such as the date and time of your visit on the Website, which browser you are using, login dates, the date and time you access to the Website, the length of time you spend on the Website;

(j) Network and connections Information: we collect information about the links that you may follow, the web pages and content of the Website that you view, the duration of such viewing as well as any other similar information and statistics that relate to your interactions with the Website;

2.2 The personal data are used for the purpose of performing the contract or in order to take steps at the request of the data subject prior to entering into a contract, verification of the Customer's identity, prevention of fraud and misuse, risk management, payment processing and chargebacks, proof of purchase and selling, comparison during the course of business, to respond to Customer service and support requests, inform about important updates of Pozess's services and terms, and analyse and improve the website's quality and usage experience. The personal data listed above under 2.1 a), b), c), d), e), f), g), h), i) and j) are required for entering into and performance of the contract. If Customer fails to provide such data Pozess will not be able to provide its services to the Customer.

The basis for such processing is contract performance (Art 6 para 1 lit b GDPR), compliance with legal obligations to which Pozess is subject (Art 6 para 1 lit c GDPR), and Pozess's legitimate interests in measures regarding prevention of fraud and misuse of its services (e.g. for illegal purposes) and risk management when operating its business and interacting with Customers (Art 6 para 1 lit f GDPR). Upon the Customer's prior consent (Art 6 para 1 lit a GDPR) the personal data may be used for marketing, direct advertisement (see point 5 "Newsletters" below), and Website analysis and improvement (see point 4 "Cookies" below).

2.3 If Pozess will ask to provide any other personal data not described above, then such data and the purpose and legal basis for the collection and processing, will be communicated to the Customer at the point of collecting the personal data.

3 RECIPIENTS OF PERSONAL DATA

3.1 The Customer agrees, that for the purpose of the identity verification, personal data may be forwarded to a third party KYC software provider. Depending on the level of verification the following personal data may be transferred to the chosen verification provider first name, surname, address, birthdate, email address, telephone number. Without providing the personal data required for the respective level the verification is not possible.

3.2 For purposes of AML (anti-money-laundering) and CFT (Combating the Financing of Terrorism) Pozess conducts – based on its legitimate interest to prevent fraud and misuse of its services (Art 6 para 1 lit f GDPR) – an examination of politically exposed persons and sanctioned persons in the course of the Know-Your-Customer process may be transferred to and checked by a competent 3rd party against a register of politically exposed persons and sanctioned persons. Without the transfer and check of these data, it is not possible to open an account with Pozess. Based on this check Comply Advantage informs Pozess whether the Customer is politically exposed persons or sanctioned persons. For further information on the possible results and consequences of the due diligence process please see Pozess's Terms and Conditions.

3.3 In case Customer uses the "Pozess support tool" provided by Tawk (www.tawk.to), or submitting a support request to "support@Pozess.com" Customer's personal data (e-mail address, name, IP-address and the additional data submitted directly by the Customer to handle the support request) are transferred to and processed by Tawk and by the customer service team at Pozess..

3.4 Further, Pozess may share the personal data with

(a) our employees who need them to fulfill contractual and legal obligations and legitimate interests, its

development partners Dreamztech Solutions Inc, 123 E Baseline RD, Ste D106 Tempe,AZ 85283,USA and Mirak.no Skjolden 1, 1367 Høvik, Norway

(c) affiliate marketing partners if Customer registers to the "Pozess Affiliate Program". In the context of the registration Customer is informed about the affiliate partners to whom the personal data (first name, last name, company name, web URL, address, contact number, email address, and any other personal data directly transferred to the affiliate partner by the Customer) will be sent. Without the transfer of the information to the affiliate partner the participation in the affiliate program is not possible.

(d) to any competent law enforcement body, regulatory, government agency, court or other third party where disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;

(e) to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of Pozess's business. The Customer's personal data may be transferred to the new owners so that the services may continue to be provided to Customer provided that Pozess informs the buyer it must use personal data only for the purposes disclosed in this Privacy Policy;

(f) to any other person with Customer's consent to the disclosure.

4 THE USE OF COOKIES

4.1 During the use of the Website, personal data may be collected through automatic data collection methods, such as cookies. Cookies are small data files which are saved to the Customer's computer or device and allow an analysis of the Customer's usage behaviour on the Website. The personal data collected are computer or device information, including IP address, operating system, browser type, device type, unique device identification number, and data which represent the usage behaviour on the Website (e.g. the time spent on the Website, which pages were accessed or links clicked). These data are collected by Pozess to analyse and evaluate the effectiveness of Website and to improve its quality for a better Customer experience.

4.2 Further, Pozess uses the services of the data processor Hotjar Limited, in Malta, to analyse and better understand Customer's needs and to optimize the Website's service and experience. Hotjar is a technology service that helps Pozess better understand the Website experience (e.g. how much time user spend on which pages, which links they choose to click, what users do and don't like, etc.) enabling to improve the services. To this end Hotjar's cookies are stored that collect data on the Customers' Website behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display the Website). Hotjar stores this information in a pseudonymized form. Neither Hotjar nor Pozess will use this information to identify individual users or to match it with further data on an individual Customer. For further details, please see Hotjar's privacy policy by clicking on this link(<https://www.hotjar.com/legal/policies/privacy>). The customer can opt-out from Hotjar's cookies by following this opt-out link(<https://www.hotjar.com/legal/compliance/opt-out>).

4.3 Further, Pozess uses Google Analytics, a web analytics tool by Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses cookies. The stored information of the

use of the Website (e.g. pages visited, users activities on Website, time spent on the Website) which is generated by the cookies is transmitted and saved on a server by Google in the USA. This Website uses the IP anonymization on, whereby the IP address of the Customer is shortened by Google within the European Union and the European Economic Area. Only in exceptional cases, the whole IP address is first transferred to a server of Google in the USA and then shortened.

4.4 On behalf of Pozess, Google will use this information to evaluate the usage of the Website for reports about the Website activity and to fulfill further services towards the Website owners concerning the activity on the Website and internet. The Customer's IP address acquired from Google Analytics, will not be merged with other data from Google.

4.5 By clicking on the "OK"-button in the Website's cookie banner the Customer agrees to the use of cookies. The consent can be withdrawn at any time by deleting the cookies from the terminal device and browser and adjusting the browser settings; this, however, may compromise the functionality of the Website. The withdrawal of the consent does not affect the lawfulness of processing based on consent before its withdrawal.

4.6 The Customer can disable cookies to be saved with specific browser settings; thereby the Customer might not be able to use all the offered functions on the Website to their full extent. Furthermore, the Customer can disable the collected website-specific data (IP address) through cookies to send and processed by Google, by downloading and installing the following browser plugin (<http://tools.google.com/dlpage/gaoptout>).

5 NEWSLETTER

5.1 Upon Customer's consent his email address, name, last login date, register date will be passed on to Mailchimp or other 3rd party service providers in order to receive per email newsletters and information from Pozess and regarding Pozess's events, new products, services, and app features.

6 DATA RETENTION

6.1 Pozess erases the Customer's personal data in principal 1 year after termination of the contractual relationship or before if the data is not required for the purpose for which they were collected anymore. A longer retention may be necessary due to guarantee, warranty, statute of limitations (e.g. the limitation period for damages of 3 years or in specific cases the general limitation period of 30 years and statutory retention periods (e.g. under commercial or tax law) applicable to Pozess, or for the duration of any legal disputes in which the data are required as evidence or for as long as there are other legitimate interests in retention.

7 SOCIAL SHARING

7.1 Our Website and mobile apps may offer social sharing features, links to social media and other integrated tools. Your use of such features enables the sharing of information with your contacts or the public, depending on the settings you use with the entity that provides the social sharing feature or social media. Please visit the privacy policies of the entities that provide these features to obtain more information about the purpose and scope of data collection and the processing of such data by such entities.

8 LINKS TO THIRD PARTY WEBSITES

8.1 Pozess can display third party advertisements and other related content that links to third party websites. Pozess cannot control or be held liable for the privacy policies and content of any third parties. We advise you to read their privacy policies to learn how they collect and process your personal information.

9 SECURITY

9.1 Pozess is keen to take all necessary actions to protect your information against unauthorized access, loss, destruction or undesired alteration this includes password protection, encryption, secure channels and database. Your password is meant to protect your Pozess Account, so we strongly recommend you to use a unique and strong password, limit access to your computer and browser, and sign off after having used our Website.

Even if Pozess is continuously implementing and updating its administrative, technical and physical security measures to ensure protection of your information, Pozess cannot guarantee the security of the transmission or storage of your information in the Internet environment at any time. You agree to not hold us and our respective past, present and future employees, officers, directors, contractors, consultants, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns (collectively, the "Parties") liable for any loss or damage of any sort incurred as a result of any misappropriation, interception, modification, deletion, destruction or use of information provided through our Website.

You understand and agree that your transactional information will be made public on the Ethereum blockchain and, therefore, disclosed to anyone.

YOU ACKNOWLEDGE THAT THE USE OF THE INTERNET IS NOT SAFE AND THAT THERE ARE CERTAIN INHERENT RISKS TO YOUR PERSONAL DATA. POZESS SHALL MAKE REASONABLE EFFORTS TO PROTECT YOUR PERSONAL DATA BUT IT CANNOT GUARANTEE OR WARRANT THAT DATA YOU PROVIDE TO POZESS IS SAFE AND PROTECTED FROM UNAUTHORIZED THIRD-PARTY ACCESS AND THEFT AND, THEREFORE, WAIVES ALL LIABILITY IN THIS RESPECT.

10 RIGHTS & CHOICES

10.1 In accordance with applicable law, the Customer has the right to access, correct, request deletion of his personal data, to object to the processing of his personal data, and to data portability of his personal data, to request restriction of the processing of his personal data. To exercise these rights the Customer can send an email to support@Pozess.com. Pozess does not use personal data for automated decisions within the meaning of Art 22 GDPR (i.e. decisions producing legal effects concerning data subjects, or otherwise significantly affecting them, based solely on automated processing of personal data, including profiling).

10.2 The Customer has the right to file a complaint to the competent data protection authority when he believes his data protection rights have been violated



10.3 You may at any time review, update or delete the information provided in your Pozess Account by logging in to your account and updating the information on your account.

10.4. Deactivate and delete your Pozess Account - As a Pozess user you may deactivate and delete your Pozess Account by emailing at support@pozess.com. The User may reactivate the Account at any time by simply registering on the Website.

11 DECLARATIONS OF CONSENT

11.1 By checking the respective box as a part of the registration process, the Customer confirms to have read the Privacy Policy and agrees to the data processing as described herein.

11.2 Further, by checking the respective separate box the Customer can consent that his email address name, last login date, register date will be sent to Mailchimp Inc, in order to receive marketing communication as described in point 5 above.

The Customer has the right to withdraw his consents at any time via E-Mail to support@Pozess.com. The withdrawal of his consent does not affect the lawfulness of processing based on consent before its withdrawal.

12 UPDATES TO THIS PRIVACY POLICY

12.1 Pozess may update this Privacy Policy from time to time in response to changing legal, technical or business developments. Pozess will take appropriate measures to inform the Customer, about the updates, consistent with the significance of the changes. Pozess will obtain Customer's consent to any material changes in this Privacy Policy if this is required by applicable data protection laws.



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