



BitCanna

PRIVACY STATEMENT

PRIVACY STATEMENT BITCANNA

BitCanna is a trade name of International Blockchain Solutions B.V. (“**BitCanna**”). We at BitCanna take your privacy and the security of your information seriously. We are committed to being responsible custodians of the information you provide to us and the information we use in the course of operating our business. Personal information (*persoonsgegevens*) entails all information about a specific person, this also goes for information that can be used to (indirectly) identify you or that we can link to you. By using this statement, we at BitCanna wish to comply and act in accordance with our obligation to inform the persons from who we use data, as is required under the General Data Protection Regulation (*Algemene Verordening Gegevensverwerking* or the “**GDPR**”).¹

We will only use your personal information as set out in this privacy statement. By (i) using our website <https://www.bitcanna.io> (the “**Website**”), (ii) applying and signing on to the whitelist (the “**Whitelist**”) and (iii) interacting and corresponding with us, you agree to us using your personal information in accordance with this statement.

USAGE OF YOUR PERSONAL DATA

BitCanna will collect the personal data mentioned in this statement exclusively for the following purposes:

- to verify whether or not you are eligible to participate in our upcoming token sale;
- to provide our services to you, including but not limited to the execution of agreements you have entered into, to verify your identity, to maintain accurate information about you, and/or to carry out or respond to questions, requests and/or instructions from you;
- to carry out, monitor and analyse our business;
- to troubleshoot, operate and improve our digital services, our Website and/or the Whitelist;
- to send you newsletters, marketing communications, and/or other information that may interest you; and
- to share information you provide to us with selected third parties that provide services to us.

THE TYPES OF PERSONAL DATA WE COLLECT

BitCanna will collect the following information to be provided voluntarily by you to us for the purpose of providing our services and in order to comply with KYC and AML regulation:

- your name, address and primary place of residence;
- your e-mailaddress(es);
- your phone number;
- a photocopy of your ID;
- a photograph of yourself; and
- your corporate information (if applicable).

BASIS FOR PROCESSING YOUR PERSONAL DATA

BitCanna will process your abovementioned personal data exclusively on the (legal) basis listed below, as such in accordance with clause 6 of the GDPR:

- given consent to the processing;
- for the performance of a contract;
- for compliance with a legal obligation to which BitCanna may be or is subject; and
- for the purposes of the legitimate interests pursued by BitCanna.

¹ 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 (General Data Protection Regulation), to be found at the following website:

<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L:2016:119:FULL&from=EN>

SHARING YOUR PERSONAL DATA WITH THIRD PARTIES

BitCanna only shares your personal data with third parties insofar as necessary for the provision of services with due observance of the aforementioned (legal) basis. Nevertheless, BitCanna may provide your personal data to a third party, such as a supervisor or any other public authority, to the extent that there is a legal obligation to do so.

If a third party is contracted by BitCanna to process your personal data on behalf of BitCanna, a 'processing agreement' (*verwerkersovereenkomst*) is concluded under which the designated third party is also obliged to comply with the GDPR. Third parties contracted by BitCanna who offer services as a controller (if any), are also responsible for compliance with the GDPR for the (further) processing of your personal data.

STORAGE OF YOUR PERSONAL DATA

The personal data that we collect from you will be transferred to and stored at a secure server administered by BitCanna. Your personal data will be processed by staff who work for us and/or by staff who work for one of our suppliers. This includes staff engagement in, among other things, but not limited thereto, the fulfilment of your order and the providing of support services. By submitting your personal data you agree to this transfer, storing and processing. We will take all the necessary steps to ensure that your data is treated securely and in accordance with this privacy statement.

All the (personal) data you provide to us is stored on secured servers. Where we have given you a password which enables you to access certain parts of our Website and/or the Whitelist, you are responsible for keeping your own password confidential.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to and through our Website and/or the Whitelist. Therefore, any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent any unauthorised access.

HOW LONG DO WE KEEP YOUR PERSONAL DATA

We will keep your personal data no longer than is necessary in accordance with the (legal) basis and purposes stated above and/or to meet legal and regulatory requirements.

YOUR RIGHTS

You have the right under the data protection laws to access and review the information we hold about you, subject to certain conditions. If you wish to make an application to access this information, please contact us via the contact details stated at the end of this privacy statement. You also have the right to amend or update the information which we hold about you. To do so, or if you wish us to stop using your personal data, you can also contact us via the contact details stated at the end of this privacy statement. You will receive a written response by us within four (4) weeks of receipt of your request.

Specific circumstances may arise because of which BitCanna cannot (fully) execute your request as mentioned above. Such circumstances may include, amongst other things, compliance with a legal obligation to which BitCanna may be or is subject.

If you have the opinion that we are not treating your personal information with an adequate level of precision and/or confidentiality, you also have the right to file a complaint with the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*).

THIRD-PARTY WEBSITES AND SOCIAL MEDIA

On the Website 'buttons' and/or hyperlinks are included to promote or share web pages on social (media) networks or third-party websites such as Twitter, LinkedIn or Facebook. BitCanna does not supervise these networks and websites and is therefore not responsible for the processing of your personal data by and through the parties behind those networks and websites. The use of these media is therefore at your own risk. Before you make use of these third-party services, BitCanna recommends you to read the privacy statements of those third parties.

COOKIES

In order to increase the user-friendliness of the Website and to collect the data of usage of the Website, BitCanna uses so-called 'cookies'. A cookie is a small text file that is placed on your computer, tablet or smartphone during your visit on the Website. You can refuse the use of these cookies at any time, although this may limit the functionality and ease of use of the Website.

The Website also uses cookies from Google Analytics to follow, in general terms, the user behaviour and general trends and to obtain reports. This helps to improve the functioning of the Website. Google may provide this information to third parties if Google is legally obliged to do so or insofar third parties process the information on behalf of Google. By using the Website, you agree to the processing of the information by Google in the manner and for the purposes described above. Cookies are also placed by the use of buttons and/or links, as described above under "*Third-party websites and social media*". As stated before, BitCanna has no influence on the placement and usage of those cookies by third parties.

More information regarding the functioning of cookies and how to block and/or delete them can be found on the website of the Dutch Authority for Consumers & Markets (*Autoriteit Consument en Markt*), in Dutch: <https://www.consuwijzer.nl/telecom-post/internet/privacy/uitleg-cookies>

AMENDMENTS TO THIS PRIVACY STATEMENT

BitCanna has the right to change the contents of this privacy statement at any time without any prior notice. Amendments to this privacy statement are published on the Website. Therefore, we advise you to consult the Website on a regular basis.

QUESTIONS AND CONTACT DETAILS

We welcome your comments and inquiries. If you wish to contact us with questions about our privacy or data protection practices, please use the following contact details:

International Blockchain Solutions B.V.

info@bitcanna.io

Nieuwezijds Voorburgwal 101 (3)

1012RG Amsterdam

Chamber of commerce number: 70123713

This version of the privacy statement has been implemented on June 15th, 2018.
