



Namahe Privacy

May 2018

NAMAHE PRIVATE LIMITED

INVESTOR PRIVACY & FAIR PROCESSING NOTICE

1. **About this notice**

This fair processing notice explains how and why Namahe Limited (a limited liability company incorporated under the laws of Singapore, whose address is 141 Middle Road, #05-06 GSM Building, Singapore 188976) including each of its operating entities, including those in the UK (also referred to as "**Namahe**", "**we**", "**our**" and "**us**") uses personal data about those individuals that either:

- use our website namahe.io (the "**Website**");
- communicate with us; or
- invest in our Token Generation Event ("**TGE**")

(in each case, referred to as "**you**").

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

2. **Our data protection responsibilities**

In this notice we refer to a the following terms, which have the following meanings:

- "**Personal data**" is any information that relates to an identifiable natural person. Your name, address and contact details are all examples of your personal data, if they identify you.
- The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.
- Namahe is a so-called "**controller**" of your personal data. This means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with applicable data protection laws.

3. **What types of personal data do we collect and where do we get it from?**

We collect different types of personal data about you in relation to your use of the Website, communications with us or the TGE and your ongoing investment (as applicable). We cannot communicate with you or administer the TGE and your investment with us without your personal data. Where we don't need your personal data, we will make this clear, for instance we will explain if any forms you are required to complete are optional or contain sections that can be left blank.

You provide us with personal data when you communicate with us (including via the Website) and when you seek to make an investment as part of the TGE. We also obtain some personal data from other sources, and create some personal data ourselves, as set out in the table below.

If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting info@namahe.io.

We collect your personal information from various sources. The table below sets out the different types of personal information that we collect and the sources we collect it from.



Category	Type of personal data	Collected from
Contact Information	<ul style="list-style-type: none"> Name Address Telephone number Email address Organisation details (eg your place of work, job title and organisation contact information) Your marketing preferences 	<ul style="list-style-type: none"> You
Background And Identity Check Information	<ul style="list-style-type: none"> Contact Information (see above) Date of birth Passport Utility bill and/or other proof of address, such as bank statement or driving license Nationality 	<ul style="list-style-type: none"> You Third party systems used for our identity checks
Investment Information	<ul style="list-style-type: none"> Contact Information (see above) Amount invested and other details relating to your investment Payment information You/your organisation's banking details 	<ul style="list-style-type: none"> You Third party systems used for the TGE
Website Information	<ul style="list-style-type: none"> Contact Information (see above) IP address and other online identifiers / web beacons Usernames, passwords and other log-in details (including profile picture(s)) Details of your online browsing activities on our website, such as the pages, products or areas of our website that you visit Your account settings including any default preferences, any preferences we have observed, such as the types of offers that interest you, or the areas of our website that you visit. 	<ul style="list-style-type: none"> You Device used to access the Website Our Website
Sensitive Information	<ul style="list-style-type: none"> Racial or ethnic origin (including your nationality and passport information) Information relating to actual or suspected criminal convictions and offences (pursuant to anti-money laundering and identity checks) 	<ul style="list-style-type: none"> You Third party systems used for our identity checks

4. **What do we do with your personal data, and why?**

We process your personal data for particular purposes in connection with your investment or engagement with us, and the management and administration of our business.

We are required by law to always have a so-called "lawful basis" (i.e. a reason or justification) for processing your personal data. The table below sets out the purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.



Please note that where we have indicated in the table that our processing of your personal data is either:

- (a) necessary for us to comply with a legal obligation; or
- (b) necessary for us to take steps, at your request, to potentially enter into an contract (including for investment) with you, or to perform it,

if you choose not to provide the relevant personal data to us, we may not be able to accept your investment.

Purposes of processing	Lawful basis			
	Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
Contact Information				
a) Responding to your enquiries		✓		✓ (It's important that we can respond to your enquiries)
b) Notifying you in relation to your proposed or existing investment				✓ (It's important that we keep you informed of matters related to your investment or proposed investment)
c) Sending you information as set out in the section "How do we communicate with you?", below	✓			✓ (It is important to keep you updated of our services and token sales)
Background and Identity Check Information				
d) Performing anti-money laundering checks in relation to an investment			✓	✓ (We need to ensure compliance with anti-money laundering requirements)
e) Performing identity checks in relation to an investment			✓	✓ (We need to ensure that the identity of our investors is verified)
f) Assessing your suitability for investment in the TGE				✓ (We need to ensure the above checks have not resulted in potential issues in relation to your investment)
Website Information				



Purposes of processing	Lawful basis			
	Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
g) Ensure the operation and performance of the Website (PLEASE ALSO SEE THE COOKIES SECTION BELOW)				✓ (We need to ensure the Website functions correctly)
h) To improve the functionality of the Website				✓ (It is in our interest to keep the Website up to date and improve its functionality for the benefit of users)
i) To enable you to create accounts and log-in to them via the Website				✓ (It is in our interests to grant you access to a private log-in where you can access information relevant to you and your investment)
Investment Information				
j) Providing you/your organisation with investment in the TGE		✓		
k) Taking payment from you in respect of your investment		✓		
l) Sharing relevant information in relation to your investment				✓ (It is important that we keep you updated as to the growth of your investment)
All categories				
m) Establishing and enforcing our legal rights and obligations and monitoring to identify and record fraudulent activity			✓	
n) Complying with instructions from law enforcement agencies, any court or otherwise as required by law			✓	
o) For our general record-keeping and investor relationship management		✓		✓ (We need to store investor related



Purposes of processing	Lawful basis			
	Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
				information so we can refer back to it)
p) Managing the proposed sale, restructuring or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organisation			✓	✓ (We have a legitimate interest in being able to sell any part of our business)
q) Resolving any complaints from or disputes with you		✓		✓ (We need to be able to try and resolve any complaint or dispute you might raise with us)

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand the input spread of our investors.

5. Sensitive Information

Some of the processing described in the above table will include the processing of 'special categories of personal data' and/or sensitive personal data (together, "**Sensitive Information**" – as set out in the table at **paragraph 3**, above). This refers to sensitive or special categories of personal data which we are required to process with more care, according to applicable laws.

The table below sets out the different purposes for which we process your Sensitive Information and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Purposes of processing	Sensitive Information - lawful basis			
	You have given your explicit consent to the processing	It is necessary to protect somebody's vital interests or they are incapable of giving consent	It is necessary for the establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest
Performing anti-money laundering checks	✓		✓	
Performing identity checks	✓		✓	

6. Who do we share your personal data with, and why?



Sometimes we need to disclose your personal data to other people.

Inside the Namahe Group:

We are part of group of companies. Therefore, we will need to share your personal data with other companies in our group for our general business purposes, to manage your investment and, in some cases, for authorisations/approvals with relevant decision makers, reporting and where systems and services are provided on a shared basis.

Access rights between members of our group are limited and granted only on a need to know basis, depending on job functions and roles.

Outside the Namahe Group

From time to time we may ask third parties to carry out certain business functions for us, such as IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data. Examples of these third party service providers include service providers and/or sub-contractors, include IT systems software and maintenance, back up, and server hosting providers.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, where the relevant disclosure is:

- (a) if we buy, sell or transfer our business (or part of it) in connection with a share or asset sale or outsourcing, we may disclose or transfer your personal data to the prospective seller, buyer or transferor and their advisors; and
- (b) if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers, investors or others.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- (c) IT support, cloud platform and data hosting providers;
- (d) Crypto currency exchanges;
- (e) anti-money laundering and background checking vendors;
- (f) payment processors in relation to your investment with us;
- (g) consultants and professional advisors including legal advisors and accountants;
- (h) courts, court-appointed persons/entities, receivers and liquidators; and
- (i) governmental departments and statutory and/or regulatory bodies.

7. **Where in the world is your personal data transferred to?**

As part of a multi-jurisdictional organisation with operations in Singapore and the UK, we will process your personal data in those jurisdictions (which may be a jurisdiction other than that in which you are resident) .

We may also transfer your personal data to external recipients that are established in jurisdictions other than your own.



Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction.

8. **How do we keep your personal data secure?**

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate security measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

9. **How long do we keep your personal data for?**

We will only retain your personal data for a limited period of time (for example, for so long as you have invested with us plus a period of time following, based on the factors below), and for no longer than is necessary for the purposes for which we are processing it for. This will depend on a number of factors, including:

- (j) **any laws or regulations that we are required to follow;**
- (k) **whether we are in a legal or other type of dispute with each other or any third party;**
- (l) **the type of information that we hold about you; and**
- (m) **whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.**

10. **How do we communicate with you?**

We will use your personal data to communicate with you:

- in relation to any investment you make and to remind you when the token pre-sale is open;
- to administer our relationship with you;
- to respond to any questions or complaints that you may have; and
- to invite you to take part in market research or request feedback on our products and services.

From time to time and with your consent (as required), we will provide you with information about token sales, services, promotions and/or offers which may be of interest to you.

Where you have subscribed to our newsletter, we will also provide a copy by email.

Please note that you may opt-out of receiving the newsletter and any other marketing materials that we send you, by unsubscribing.

11. **Cookies**

When you visit the Website, we generate one or more “cookies.”

If you do not agree to our use of cookies, you should set your browser settings accordingly or not use the Website. Please be aware that if you disable the cookies that we use, this may impact your user experience while using the Website.

The table below summarizes the different types of cookie we use on the Website, together with their respective purpose and duration (i.e. how long each cookie will remain on your device).



Two types of cookies may be used on the Website - "session cookies" and "persistent cookies". Session cookies are temporary cookies that remain on your device until you leave the Website. A persistent cookie remains on your device for much longer or until you manually delete it (how long the cookie remains on your device will depend on the duration or "lifetime" of the specific cookie and your browser settings).

Cookies used on the Website:

Type of Cookie	What do they do?	Do these cookies collect my personal data / identify me?
Necessary	Cookies that are essential to making the Website work correctly. They enable visitors to move around our website and use our features. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session.	These cookies do not identify you as an individual. If you do not accept these cookies, it may affect the performance of our website.
Performance	Cookies that help us understand how visitors interact with our web properties by providing information about the areas visited, the time spent on the website and any issues encountered, such as error messages. They help us improve the performance of our websites, alert of any concerns and more.	These cookies don't identify you as an individual. All data is collected and aggregated anonymously.
Functionality	Cookies that allow our web properties to remember the choices you make (such as your user name, language or the region you are in) to provide a more personalized online experience.	The information these cookies collect may include personally identifiable information that you have disclosed, such as a username, for example. We shall always be transparent with you about what information we collect, what we do with it and with whom we share it. If you do not accept these cookies, it may affect Website performance and functionality and may restrict access to web content.
Targeting / advertising	Cookies that are used to deliver content that is more relevant to you and your interests. They may be used to deliver targeted advertising or to limit the number of times you see an advertisement. They also help us measure the effectiveness of advertising campaigns on the Website. We may use these cookies to remember websites you have visited and we may share this information with other parties, including advertisers and our agencies.	Most types of these cookies track consumers via their IP address so may collect some personal identifiable information.



What are cookies?

Cookies are files or pieces of information that may be stored on your computer (or other internet-enabled devices, such as a smartphone or tablet) when you visit the Website. A cookie will usually contain the name of the website from which the cookie has come from, the "lifetime" of the cookie (i.e. how long it will remain on your device) and a value, which is usually a randomly generated unique number.

What do we use cookies for?

We use cookies to make the Website easier to use and to better tailor our web presence and products to your interests and needs. Cookies may also be used to help speed up your future activities and experience on the Website. We also use cookies to compile anonymous, aggregated statistics that allow us to understand how people use our web properties and to help us improve web structure and content. We cannot identify you personally from this information.

How can I control or delete cookies?

Most internet browsers are initially set up to automatically accept cookies. You can change the settings to block cookies or to alert you when cookies are being sent to your device. There are a number of ways to manage cookies. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings.

If you disable the cookies that we use, this may impact your experience while on the Website. For example, you may not be able to visit certain areas of the Website.

If you use different devices to view and access the Website (e.g. your computer, smartphone, tablet etc.), you will need to ensure that each browser on each device is adjusted to suit your cookie preferences.

12. **What are your privacy rights and how can you exercise them?**

Where our processing of your personal data is based on your **consent** (please see the tables above), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know.

Where our processing of your personal data is based on the **legitimate interests** (please see the tables above), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Where we are processing your personal data for **direct marketing** purposes, you have the right to object to that processing.

You have the right to (subject to applicable laws and certain limitations):

- (n) access your personal data and to be provided with certain information in relation to it, such as the purpose for which it is processed, the persons to whom it is disclosed and the period for which it will be stored;
- (o) require us to correct any inaccuracies in your personal data without undue delay;
- (p) require us to erase your personal data;
- (q) require us to restrict processing of your personal data;



- (r) receive the personal data which you have provided to us, in a machine readable format, where we are processing it on the basis of your consent or because it is necessary for your contract with us (please see the tables above) and where the processing is automated; and
- (s) object to a decision that we make which is based solely on automated processing of your personal data (however, we do not currently conduct any such decision making).

If you wish to exercise any of these rights please contact info@namahe.io in the first instance.

You may also have the right to lodge a complaint with the relevant data protection regulator (for example the Information Commissioner's Office in the UK).

13. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice. We also encourage you to check this notice on a regular basis – updated copies can be found at: www.namahe.io/privacy

14. **Where can you find out more?**

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact info@namahe.io.

