



Calero Privacy Policy

Last updated: May 2nd, 2018

This Privacy Policy (the "Policy") has been created to those who are concerned with how Calero Technologies LTD, a company incorporated under the laws of British Virgin Islands ("Calero", "we", "us", "our", the "Company"), uses personal information, inter alia, information which can be used to directly or indirectly identify them ("Personal Data", "Personal Information"), which they might supply to us when they access or visit <https://calero.io> (the "Website"). "You" refers to you, as a user of the Website. For the reason of the applicable legislation, we inform you that only Calero Technologies has access to the data of your Personal Information.

1. YOUR CONSENT

By using this Website and/service, you consent to our collection and use of your Personal Information as described in this Privacy Policy. The Company's Privacy Policy applies to individuals, members of organisations and all other users of the Website to ensure we carry out our services on your behalf and conduct the necessary due diligence to reduce fraud, money laundering and terrorism financing. We reserve the right to change this Privacy Policy, if and when required, along with related procedures, at any time, without providing any prior notice.

2. COLLECTING AND USE OF PERSONAL INFORMATION

We collect information from you when you register on our Website and or express an interest in our ICO. The types of information collected include, but are not limited to: your name, entity name, physical address, telephone number(s), email address, date of birth, government-issued photo identification or other identification, account numbers, gender, nationality, country of residence, and cryptocurrency addresses.

For Users in the EEA, the User will be the "controller", as defined in the Directive and the GDPR.

If you or your organization are required under the European Union's General Data Protection Regulation (GDPR) to enter into a contract, or other binding legal act under EU or Member State law, with your data processors, [review and accept Calero's Data Processing Agreement](#).

3. PERSONAL INFORMATION THAT IS COLLECTED AUTOMATICALLY

When you access our Site, we automatically collect information about you, including but not limited to:

We collect log information about your use of our Site. Such information may include: the type of browser you are using, access times, pages viewed, our IP address, and the pages you visited before or after navigating to our Site.

We collect information about the device you use to access our Site. Such information may include: the hardware model, operating system and version, unique device identifiers, and mobile network information.

We collect information contained in or relating to any communication that you send to us or send through our Site, as well as meta-data associated with the communication.

3.1. PROCESSING IN THE EUROPEAN ECONOMIC AREA (EEA)

For Users located in European Data Region, all processing of Personal Data is performed in accordance with privacy rights and regulations following the EU Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 (the Directive), and the implementations of the Directive in local legislation.

From May 25th, 2018, the Directive and local legislation based on the Directive will be replaced by the Regulations (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, known as the General Data Protection Regulation (GDPR), and processing will take place in accordance with the GDPR.

4. PERSONAL INFORMATION THAT IS UNIQUE TO YOU

Except for the information which is collected automatically, as described in the clause 3 of this Policy above, the Personal Information is collected only when voluntarily offered by you. The Personal Information means any information that is unique to you, such as: Name, Date of birth, Name of entity you represent, if applicable, Password, if any; Your ETH wallet address (cryptocurrency address of your public ETH/BTC wallet address), ETH/BTC amount you wish to transfer, E-mail address, Country and address of residence, Other personal information you choose to provide.

By providing us your Personal Information, you also consent for us to collect, hold, use and disclose your Personal Information in accordance with this Privacy Policy. In addition to providing the foregoing information, if you choose to correspond further with us through e-mail or through the "contact"

section of our Website, we may retain, use or disclose the content of your messages together with your e-mail address and our responses, unless otherwise agreed between you and the Company in written.

5. KNOW YOUR CUSTOMER PROCESS

In order to participate in the Token Sale, each prospective participant shall be obliged to undergo the identification procedure. In certain cases (when additional verification is required by applicable laws, our anti-money laundering and counter terrorism financing (“AML”) policies) Calero may require you to provide certain additional information for the due diligence purposes.

We may request you to provide the following information for the identification and AML purposes, inter alia:

- Passport or other official document that can be used to identify you;
- Numbers that you may use or have registered with your local tax authority;
- Utility bills or other documents confirming your address;
- Photographs of you;
- Additional contact information (e.g. phone number, skype);
- Source of your funds used for purchasing Calero tokens.

Calero reserves the right to request basic Personal Data, described in the Article 4, and conduct identification and AML procedures prior to your purchase of Calero tokens and/or use of any services, available through the Website. Your participation in the Calero token sale shall always be subject to the KYC procedures, if applicable. At that, we shall not bear any liability for such possible incomplete user.

Calero may refuse your access to the Website or Calero token sale in case (a) you refuse or fail to provide information required for the identification purposes, or data required as a part of the AML procedures, or (b) it has doubts as to the validity, authenticity and genuineness of the Personal Data, provided by you.

6. COOKIES

On occasion We may gather information about your computer to facilitate usage of Our Services and to provide statistical information regarding the use of Our website.

Such information will not identify you personally because it is statistical data about Our visitors and their use of Our website. This statistical data does not identify any personal details whatsoever.

Similarly to the above, We may gather information about your general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer as a cookie and contains information that is transferred to

your computer's hard drive. They help Us to improve Our website and the Services that We provide to you.

All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of Our website.

7. THE PURPOSE OF USING PERSONAL INFORMATION

We may use the Personal Information we collect from you for the following purposes:

- Provision of services to you through the Website or the Calero Platform;
- Conducting the white listing process (for participants of the Calero token sale);
- Verifying that you are the person who you say you are;
- Conduction of the CLO Token sale, distribution of CLO tokens (which includes the use of your Personal Data in the smart contract and ETH blockchain);
- Communicating with you about Calero project, token sale, our products and services, news, events and other data which might be interesting to you in our opinion;
- Maintenance, delivery and improvement of the Website, products and services provided through it;
- Detecting, investigating and preventing fraudulent transactions and other illegal activities, and to protect the rights and property of the Calero and others;
- Analyzing and tracking data to determine the effectiveness of marketing campaign, usefulness of certain content or features, and for better understanding of users' activity;
- Notifying you about changes to the Website, terms of Calero token sale, user documentation, our products or services;
- Protecting our rights and rights of the third parties;
- Verifying compliance with the Terms of Use, governing the use of the Website.

8. HOW WE SECURE INFORMATION TRANSMISSIONS

Calero protects your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards Calero uses are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.

Calero will ensure that the Personal Data will be stored and processed with the reasonable level of care and security. Our corporate values, ethical standards and policies are committed to the protection of customer's Personal Data.

9. THIRD-PARTY DISCLOSURE

We do not sell or trade any personally identifiable information. Trusted third parties who assist us in operating our website and conducting our business may have access to personal information if necessary. Information provided by anyone through this website will be used and disclosed as necessary for regulatory and compliance purposes. In some cases, we may be required to disclose information by law.

10. THIRD-PARTY LINKS

You may find links to third party websites on Our Website. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as We have no control over them.

11. SOCIAL SHARING

The Website may allow you to share certain content from the Website on a social media or network. In case you share the content or information through a social media or network, you become involved in relations with the third party that provides the social media or network. Please visit the privacy policies of such third parties to obtain more information about the purpose and scope of data collection and the processing of such data by such entities. We do not bear any responsibility for such third parties.

12. CHANGES TO OUR PRIVACY POLICY

This Privacy Policy may be updated from time to time to reflect changes to our information practices. If we make any material changes we will notify you by email or via other messaging system, or by means of posting an updated version of this Privacy Policy on the Sites. We encourage you to periodically review this policy for the latest information on our privacy practices. Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes. In all the above cases, your continued use of Calero's Service after any notice or posted modified Privacy Policy indicates acceptance of the modified Privacy Policy.

13. RETAINING OF THE INFORMATION

We only retain personal information for the purposes for which the personal information was collected — including for the purpose of meeting any legal, accounting or other reporting requirements or obligations.

If we use personal information to make a decision that directly affects an individual, we will keep that information for at least one year after using it so that individuals have a reasonable opportunity to obtain access to it.

14. ACCESS TO THE INFORMATION, WITHDRAWAL

You have the right to withdraw your consent for collection, processing and storage of your Personal Data by us at any time, unless we are directed to retain such information by the law. The withdrawal of

consent shall not affect the lawfulness of processing based on consent before its withdrawal. If you decide to do this, you should send the respective notification to us by e-mail or through the contact form on the Website. You have the right to access Personal Information held about you. Your right of access can be exercised in accordance with the applicable laws and this Policy.

You have the rights to obtain from us a confirmation as to whether or not your Personal Data are being processed, and, where that is the case, access to the personal data, including, (a) purposes of the processing, (b) the categories of Personal Data concerned, (c) the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organizations, (d) the envisaged period for which the personal data will be stored, or the criteria used to determine that period, (e) the existence of the right to request rectification or erasure of Personal Data or restriction of processing of your Personal Data, (f) the right to lodge a complaint with a supervisory authority, (g) if Personal Data are not collected from you, any available information as to their source, (h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you. Such information shall be provided upon your request within 1 month from its receipt by us.

You may access, review and edit your Personal Data at any time by communicating Calero in writing. You have the right to demand Calero to provide you access to your Personal Data and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting Calero. Nevertheless, this request must comply with Calero legal obligations. Calero reserves its right to suspend provision of any services to you referring to Calero project and token sale, and/or delete your account on the Website without prior notice, not providing any compensation to you. You may opt out of receiving promotional communications from us at 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, if any. You may lodge a complaint with a supervisory authority in case you believe that our actions violate your rights as to the Personal Data.

15. THE RIGHT TO DATA PORTABILITY

You have the right to receive the Personal Data concerning you, which you have provided to Calero, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Calero. In exercising this right, you shall have the right to have the Personal Data transmitted directly from us to another controller, in case we reasonably find this technically feasible. Please note that execution of this right must not adversely affect the rights and freedoms of others.

16. THE RIGHT TO BE FORGOTTEN

You have the right to obtain from Calero your Personal Data without undue delay where one of the following grounds applies: (a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, (b) you withdraw your consent for the processing

and there is no other legal ground for the processing, (c) you object to the processing where your Personal Data are processed for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing, (d) the Personal Data have been unlawfully processed, (e) the Personal Data have to be erased for compliance with a legal obligation in the law to which you are the subject. We may reject your request for erasure in case the processing of your Personal Data is necessary (i) for exercising the right of freedom of expression and information, (ii) for compliance with a legal obligation which requires processing by the law to which Calero is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us, (iii) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the law in so far as the right for erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or (iv) for the establishment, exercise or defense of legal claims.

17. THE RIGHT TO RESTRICTION OF PROCESSING

You have the right to obtain from us restriction of processing where one of the following applies: (a) the accuracy of the Personal Data is contested by you, for a period enabling us to verify the accuracy of the Personal Data, (b) the processing is unlawful and you oppose the erasure of the Personal Data and request the restriction of their use instead, (c) Calero no longer needs the Personal Data for the purposes of the processing, but is required by you for the establishment, exercise or defense of legal claims, (d) you have objected to processing pending the verification whether the legitimate grounds of Calero override those of you. Where processing has been restricted in accordance with the above, such Personal Data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the law. If you obtain restriction of processing pursuant to the above, you shall be informed by Calero before the restriction of processing is lifted.

18. CONTACT

Questions, comments and request regarding this Privacy Policy are welcomed and should be assessed to admin@calero.io or through the Telegram group.