

Privacy Policy

Membrana LTD is a company incorporated under the laws of Cayman Islands under registration number 339391 whose registered office is at Willow House, Cricket Square, PO Box 709, Grand Cayman KY1-1107, Cayman Islands (hereinafter referred as "**Membrana**", "**us**" or "**we**").

You must read this policy before using our websites (including those available via the URL www.membrana.io) or any other URL on which we make any of our websites available (the "**Website**"). By accessing, browsing or otherwise using the Website, you are deemed to have read, understood and agreed to this policy. If you do not agree with any part of this policy, you must not use the Website.

For the purposes of applicable data protection laws, Membrana is a 'controller' of certain personal data that is processed through the Website. We are committed to respecting the privacy of individuals whose personal data we process. This includes information about you that we collect directly from you, or through third parties.

We have appointed a Data Protection Officer to oversee any questions or issues in relation to this policy. If you have any questions or wish to exercise any of your legal rights in relation to your personal data, please contact the Data Protection Officer using the details set out below:

Email: info@membrana.io (please use "Data Protection Officer" in the email subject line)

Collection and Use of Personal Data

When you register to use the Website

If you register to use the Website (in order to subscribe for the subscription process (the "**Token Sale**"), you must provide certain personal data about you, including your email address(es) and country of residence, and choose a password.

When you contact us

If you contact us by telephone, email, post or using any function made available on our Website, we will collect any personal data about you that you choose to give us.

Token Sale

Within the subscription process, you will be asked to enter personal data. We may transfer your personal data to other service providers if it is necessary for the completion of the Token Sale. This encompasses the transfer of data necessary to KYC ("know your customer") and payment service providers.

IP Addresses, Cookies and Web Logs

As with most websites, our servers automatically collect certain technical information such as your IP address, the date and time of your visit, and information about the browser you use. This information is used for system administration and to collect and report aggregate information on visits to the Website and users' browsing patterns which does not identify specific individuals.

Like many other companies, we also use 'cookie' technology, where our servers deposit special codes on a visitor's computer. Cookies help us to improve the Website and to deliver a better and more personalised service. As above, this information also helps us determine the total number of visitors to the Website and browsing patterns on an on-going basis and the types of Internet browsers (e.g., browsers from Google, Apple, Microsoft and Mozilla) and operating systems (e.g., Microsoft Windows, Android or Apple iOS) used by our visitors. This information is used to improve the Website and enhance your online visits. We do not use this information to identify visitors or cross-reference this information with personal data you may provide on the Website. If you wish, you can set up your browser so that you do not

receive any 'cookies' while visiting the Website, but if you do so this may affect the performance of the Website and you may not be able to use all the options otherwise available.

By continuing to use the Website, you agree to our use of cookies, in the manner set out above.

How Your Personal Data Will Be Used

We use the information held about you to provide you and others with an opportunity to participate in the Token Sales, to ensure that content from the Website is presented in the most effective manner for you and for your computer and to notify you about any changes to the Token Sales process. We also use the information you provide to ensure compliance with this policy.

In summary, we use your personal data for the following main purposes, to:

- enable your use of the digital presence (establishing a connection);
- provide, manage and improve the Website (for example, through technical administration and maintenance of system security);
- personalise the Website for you;
- administer and operate your account;
- process your requests, for example to reserve a certain amount of Tokens purchased in the Token Sale;
- process feedback provided by you or in relation to you;
- prevent fraud and improve the security of the Website;
- provide user support, process any complaints or enquiries made by you and to tell you about important changes to the Website;
- provide reports to our content suppliers;
- provide reports, analytics and benchmarking to you and other users of the Website and our services;
- to contact you (including by email, SMS and push notifications) about the Token Sale, subject always to your communication preferences;
- for research, analysis and risk management; and
- conduct marketing or research.

Recipients of Personal Data

We may disclose personal data we hold about you to:

- our service providers, including IT hosting companies;
- third parties in the event that we sell, or explore the sale of, any relevant part of our business or related assets to that third party;
- professional advisors, such as attorneys/lawyers, accountants, auditors, financial and other professionals;
- regulatory authorities, law enforcement agencies, courts and other relevant tribunals if we are under a duty to disclose or share any data by applicable law, to comply with any legal obligation or are permitted to do so to enforce any contractual arrangements in relation to the Website or the Token Sale.

Service providers that we engage will only be permitted to use personal data where necessary for the services being provided by them and will not be permitted to use such personal data for any other purpose. We will require service providers to process the personal data on terms no less stringent than this policy and ask them to adhere to all applicable laws.

Except as described above, we will not share, exchange, sell or rent your personal data with any other third parties without your permission.

Our Legal Basis for Processing your Personal Data

If you are a registered user of the Website, our legal basis for processing your personal data is that it is necessary for the conduct of the Token Sale. In all other circumstances, including where you contact us, our legal basis for processing your personal data is that it is necessary for our legitimate interest in conducting our business balanced against individuals' rights and interests. For further information, please contact our Data Protection Officer, using the contact details at the top of this policy.

Storage and Security

The data that we collect from you is stored outside the EEA and is treated in accordance with this privacy policy.

Where we have provided you (or where you have chosen) a password that enables you to access certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

The transmission of information through the internet is not completely secure. We will do our best to protect your personal data, but we cannot guarantee the security of your data transmitted to the Website through the internet; any such transmission is at your own risk. Once we receive your personal data, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Please remain guarded against phishing emails. Phishing is a method used by fraudsters to deceive someone into giving sensitive information, such as bank account details, credit card numbers or username and passwords. Most of the time, phishing will take the form of emails, which purport to be from well-known companies and ask recipients to send their private information. This information is then used for identity theft and fraud. We will never ask you for your account password. If you have any suspicions or doubts whether any email or communication that purports to come from us is genuine or not, please check with us first before responding to it.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your Rights

You have certain rights in relation to your personal data under data protection laws. You have the right to request: (i) access to your personal data; (ii) the transfer of your personal data to another controller (portability); (iii) the rectification (update or correction) of your personal data if it is incomplete or inaccurate; (iv) erasure of your personal data (the right to be forgotten); (v) restriction of processing of your personal data; (vi) your personal data is not processed (object to the processing of your personal data). These rights are not absolute.

Where we have obtained your consent for the processing of your personal data, you have the right to withdraw your consent at any time.

You have the right to ask us at any time not to use your personal data for direct marketing purposes. You can exercise this right at any time by contacting us or by choosing the "unsubscribe" option in marketing emails you receive from us.

If you would like to exercise any of these rights, or if you have any other queries about this policy, please contact the Data Protection Officer (see contact details above). There may be a reasonable charge to exercise some of your rights where permissible under applicable law. We will respond to all legitimate requests within one month. Occasionally it may take us longer than a month if we need additional information to verify your identity, your request is particularly complex or you have made a number of requests. In these situations, we will notify you and keep you updated.

Changes to the Privacy Policy

We may make changes to this policy and any such changes shall be posted on this page and will apply to your continued use of the Website.

Links

The Website may from time to time, contain links to websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites are not required to comply with this Privacy Policy and will likely have their own policies. We do not accept any responsibility or liability for the handling of your personal data by these other websites. Please check the privacy policies of these websites to ensure you are satisfied before submitting any personal data to these websites.

Last updated: 7 December 2018