

## LUXURY LEDGER PRIVACY POLICY

### 1) Privacy Principles

Your privacy is important to us. We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. Luxury Ledger (hereinafter, "Luxury Ledger", "we", "us" or "our") are committed to protecting and respecting your privacy.

Please read our Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using our web [www.luxuryledger.io](http://www.luxuryledger.io) immediately.

### 2) Scope

This Privacy Policy applies to Personal Information we collect when you use or access our Website and other Services offered by Luxury Ledger that link to or reference this policy (together, with any and all future online and offline offerings operated by or on behalf of Luxury Ledgers, the "Services").

All individuals whose responsibilities include the Processing of Personal Information on behalf of Luxury Ledger are expected to protect that data by adherence to this Policy. This Policy is intended to meet requirements globally, including those in North America, Europe, APAC, and other jurisdictions.

### 3) What is Personal Information?

Personal Information is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal Information is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### 4) When do we collect information?

We collect information from you when you register, sign up for our newsletter, respond to marketing communication, surf the website, or use certain other site features.

### 5) What data do we collect?

Depending upon your use of our Website, we may collect some or all of the following personal data: •Name; •Email address; •Social media username; •IP address; •Web browser type and version; •Operating system; and •A list of URLs starting with a referring site, your activity on our Website.

### 6) How do we use your information?

We may use the information we collect from you for various purposes, in the following ways: • To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested; • To improve our website in order to better serve you; • To allow us to better service you in responding to your customer service requests; • To administer a contest, promotion, survey or other site feature; • If you contact us, to reply to your queries; and •As required for regulatory purposes.

### 7) How long will we keep your Personal Information?

We will not keep your personal information for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will always be managed with the following principles in mind: • We think about what type of information it is, the amount collected, how it is collected, how sensitive it might be and any additional legal requirements we are bound by; • Where possible we will anonymize any information we keep about you for the purposes of web analytics; • We have designed our website, our products and our services

so that we don't hold your information any longer than we have to; and • We always think about the potential risk from anyone using or sharing this information without permission and have policies and procedures to prevent this from happening.

#### **8) Do we use cookies?**

Yes, our website uses cookies. A cookie is a small text file placed on your computer or mobile device when you visit a website or use an app. Cookies collect information about users and their visit to the website or use of the app, such as their Internet protocol (IP) address, how they arrived at the website (for example, through a search engine or a link from another website) and how they navigate within the website or app. We use cookies and other technologies to facilitate your internet sessions and offer you services according to your preferred settings, track use of our websites and to compile statistics about activities carried out on our website.

All Cookies used by and on our Website are used in accordance with current Cookie Law.

Our Website uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyze anonymous usage information, enabling us to better understand how our Site is used. This, in turn, enables us to improve our Website and the products and services offered through it.

The analytics service(s) used by our Website use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our Website, it does enable us to continually improve our Website, making it a better and more useful experience for you.

#### **9) Can you withhold Information?**

You may access certain areas of our Website without providing any personal data at all. However, to use all features and functions available on our Website, you may be required to submit or allow for the collection of certain data. You may restrict our use of Cookies.

#### **10) Your Choices & Obligations**

- Unsubscribe

We use the email address you provide to send you information and updates about Luxury Ledger, company news, related project information, etc. If at any time you would like to unsubscribe from receiving future emails, we include unsubscribe instructions at the bottom of each email.

- Rights of Access, Rectification, Erasure, and Restriction

You may inquire as to whether Luxury Ledger is Processing Personal Information about you, request access to Personal Information, and ask that we correct, amend, or delete your Personal Information where it is inaccurate. Where otherwise permitted by applicable law, you may send an e-mail to [support@luxuryledger.io](mailto:support@luxuryledger.io) use any of the methods set out in this Policy to request access to, receive (port), restrict Processing, seek rectification, or request erasure of Personal Information held about you by Luxury Ledger. Such requests will be processed in line with local laws.

- New Uses of Personal Information

Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt out. Where consent of the Individual for the Processing of Personal Information is otherwise required by law or contract, Luxury Ledger will endeavor to comply with the law or contract.

#### **11) Security**

We take our responsibility to protect the privacy and confidentiality of your information, including Personal Information, very seriously. We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

By using the Services or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on [www.luxuryledger.io](http://www.luxuryledger.io) or sending an e-mail to you. You may have a legal right to receive this notice in writing.

If you have any questions about the security of your Personal Information, you can contact us at [support@luxuryledger.io](mailto:support@luxuryledger.io)

## **12) Retention**

Luxury Ledger retains the Personal Information we receive as described in this Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our products and Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

## **13) Consent**

By using our site, you consent to our privacy policy.

## **14) Children's Privacy**

We do not knowingly collect, maintain, or use Personal Information from children under 13 (and in certain jurisdictions under the age of 16) years of age, and no part of our Services are directed to children under the age of 13 (and in certain jurisdictions under the age of 16). If you learn that your child has provided us with Personal Information without your consent, you may alert us at [support@luxuryledger.io](mailto:support@luxuryledger.io). If we learn that we have collected any Personal Information from children under 13 (and in certain jurisdictions under the age of 16), we will promptly take steps to delete such information and terminate the child's account.

## **15) Redress/Compliance and Accountability**

If after reviewing this Policy, you would like to submit a request, or you have any questions or privacy concerns, please contact us as described below.

Luxury Ledger will address your concerns and attempt to resolve any privacy issues in a timely manner.

## **16) Amendments and updates to Luxury Ledger Privacy Policy**

We may change this Privacy Policy from time to time. If we do, we will let you know by revising the date at the top of the policy. If we make a change to this policy that, in our sole discretion, is material, we will provide you with additional notice. By continuing to use our Services after Privacy Policy changes go into effect, you agree to be bound by the revised policy. We strongly encourage you to review the Privacy Policy whenever you access or use our Services or otherwise interact with us to stay informed about our information practices and your privacy rights and choices.

## **17) Contact Us**

If you have questions or concerns about this Privacy Policy, please contact us through the information below:

[Support@luxuryledger.io](mailto:Support@luxuryledger.io)