

**RECLAMCO.IN TOKENS SALE  
PRIVACY POLICY**

Last updated: 24.11.2017

## **STATUS AND ACCEPTANCE OF PRIVACY POLICY**

1. This Privacy Policy (hereinafter referred to as the “Policy”) sets forth the general rules of Participant’s Personal Data collection, processing, distribution, use and keeping by RECLAMCO.IN .

2. Throughout this Policy, RECLAMCO.IN will use the term “Personal Data” to describe information that can be associated with a specific person (the Participant) and can be used to identify that person (including the information about the Participant’s activities, such as information about Your use of the Website, when directly linked to personally identifiable information, including automatically collected). RECLAMCO.IN does not consider Personal Data to include information that has been anonymized so that it does not identify a specific Participant.

3. This Policy is inalienable part of RECLAMCO.IN General Terms & Conditions of RECLAMCO.IN Tokens Sale. In terms not regulated by this Policy, the RECLAMCO.IN General Terms & Conditions of RECLAMCO.IN Tokens Sale shall apply to the relationships that arise hereunder.

4. The definitions set forth herein and mentioned with capital letter shall have the meaning as described in RECLAMCO.IN General Terms & Conditions of RECLAMCO.IN Tokens Sale.

5. It is presumed that by the fact of the Website use and purchase of RECLAMCO.IN Tokens or by providing RECLAMCO.IN the Personal Data directly on its request, the Participant has fully read, understood and accepted this Policy. If any Participant does not agree with this Policy in general or any part of it, such Participant should withhold from using the Website and/or purchase of RECLAMCO.IN Tokens.

## **COLLECTION, PROCESSING AND USE OF PERSONAL DATA**

6. The purpose of personal data collection, storage and processing within the RECLAMCO.IN project shall only be the identification of the RECLAMCO.IN Token purchaser – Participant of the RECLAMCO.IN Tokens Sale.

7. RECLAMCO.IN collects Personal Data from running the Website and uses Personal Data, provided to RECLAMCO.IN by You. When the Participant visits the Website or uses our products, RECLAMCO.IN collects the Personal Data sent to RECLAMCO.IN by Your computer, mobile phone, or other access device. This Personal Data includes:

- 1) Your mobile network information;
- 2) Your IP address;
- 3) Information about the device that Participant uses to access the Website and/or RECLAMCO.IN App. Such information includes, but is not limited to, identifier, name, and type, operating system;
- 4) Web log information, such as Your browser type, and the pages You accessed on RECLAMCO.IN Website.

When the Participant uses a location-enabled device with RECLAMCO.IN Website and products, RECLAMCO.IN may collect geographical location data or use various means to determine the location, such as sensor data from the Participant’s device that may, for instance, provide data on nearby cell towers and Wi-Fi access spots. However, RECLAMCO.IN will not

release Your personally identifying information of such kind to any third party without Your consent, except as set forth herein.

8. If the Participant wants to purchase RECLAMCO.IN Tokens, RECLAMCO.IN will collect and store the following types of Personal Data about You:

- 1) Your name;
- 2) Your email.

9. In certain cases (when additional verification by bank or compliance authority is needed according to governmental rules, anti-money laundering (AML) or “know-your-customer” (KYC) policies) RECLAMCO.IN may require You to provide additional information, and namely:

- 1) Your address;
- 2) Date of birth;
- 3) Passport or driver license details;
- 4) Numbers that You may use or have registered with Your local tax authority;
- 5) Utility bills;
- 6) Photographs of You;
- 7) Confirmation of proceeds sources;
- 8) Sworn statements.

The abovementioned information and details shall be provided only upon special personal request to the Participant and specified in respective email.

10. RECLAMCO.IN reserves its right to request basic Personal Data, described in clause 9, prior to the purchase of RECLAMCO.IN Tokens and/or use of any services, available through the Website. RECLAMCO.IN may refuse the Participant access to the Website in case if RECLAMCO.IN has grounded doubts as to the validity, authenticity and genuineness of the Personal Data, provided by the Participant.

11. If the Participant does not provide RECLAMCO.IN with the Personal Data as specified in clauses 8, 9. hereof, the Participant shall not be able to use the full functionality of the Website and purchase RECLAMCO.IN Tokens and/or use the RECLAMCO.IN Application (“RECLAMCO.IN App”). At that, RECLAMCO.IN shall not bear any liability for such possible incomplete use.

12. When the Participant accesses the Website or uses RECLAMCO.IN products or services RECLAMCO.IN (or a service provider on our behalf) may place small data files called “cookies” on the Participant’s computer or other device. RECLAMCO.IN uses these technologies to recognize You as our Token Sale Participant, customize RECLAMCO.IN Website, RECLAMCO.IN App and advertising, measure promotional effectiveness and collect information about Your computer (as described in clause 7. hereof) or other access device to mitigate risk, help prevent fraud, and promote trust and safety. You may control the use of cookies within Your internet browsers’ settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of our Website and services may be impaired.

13. RECLAMCO.IN collects from the Participants only the Personal Data that RECLAMCO.IN needs for their proper use of the Website or for purchase of RECLAMCO.IN Tokens. In particular, RECLAMCO.IN uses the Participant’s Personal Data to:

- 1) Administer RECLAMCO.IN Website and RECLAMCO.IN App and provide services;
- 2) Develop new products and services;
- 3) Personalize RECLAMCO.IN Website and RECLAMCO.IN App for You;
- 4) Send You technical notices, support and administrative messages;
- 5) Communicate with You about products, services, promotions, events and other news and information RECLAMCO.IN may think will be of interest to You;
- 6) Monitor and analyze trends, usage and activities in connection with RECLAMCO.IN Website and RECLAMCO.IN App;
- 7) Provide third parties with statistical information about RECLAMCO.IN Participants (but those third parties will not be able to identify any individual Participant from that information);
- 8) Detect, investigate and prevent illegal activities within the RECLAMCO.IN App and the Website, as well as protect the rights and property of the RECLAMCO.IN and others;
- 9) Link or combine Personal Data RECLAMCO.IN collects from or about You; and
- 10) Verify compliance with the terms and conditions governing the use of RECLAMCO.IN Website and RECLAMCO.IN App.

14. RECLAMCO.IN is the only data controller and processor, except for the cases when there is an objective RECLAMCO.IN needs to control/process or store Personal Data at RECLAMCO.IN 's counterparties or agents. Should such counterparty or agent be engaged by the RECLAMCO.IN , RECLAMCO.IN shall notify You in advance.

15. You may access, review and edit Your Personal Data at any time by communicating RECLAMCO.IN in writing.

16. The Participant has the right to require RECLAMCO.IN to delete Participant's Personal Data provided by the Participant to RECLAMCO.IN or revoke his (or her) consent for collection, processing and storage of his (or her) personal data by RECLAMCO.IN at any time. If You decide to do this, You should send the respective notification to the RECLAMCO.IN . RECLAMCO.IN shall delete Your respective Personal Data from any sources within 24 hours from the moment RECLAMCO.IN receive such request from You. At that, the RECLAMCO.IN reserves its right to suspend provision of any services to You referring to RECLAMCO.IN project and/or delete Your Account on the Website or the RECLAMCO.IN App without prior notice, not providing any compensations to You.

17. RECLAMCO.IN will not publish any Personal Data related to Your purchase of RECLAMCO.IN Tokens without Your prior written consent.

#### **PERSONAL DATA PROTECTION AND SHARING**

18. RECLAMCO.IN will do any and all efforts and actions prescribed by Applicable Law to store any of Your personal data in secrecy.

19. RECLAMCO.IN stores and process Your Personal Data on RECLAMCO.IN servers in various jurisdictions, where our facilities and/or RECLAMCO.IN service providers are located. By submitting Your Personal Data, You agree to this transfer, storing, or processing. RECLAMCO.IN will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Policy. RECLAMCO.IN 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. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent than in Your country. From time to time, the Personal Data may be also stored in other locations, and in such cases, RECLAMCO.IN will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

20. RECLAMCO.IN will not share Your Personal Data with any third parties other than RECLAMCO.IN respective identity verification partners. RECLAMCO.IN reserves it's right to share Your Personal Data with:

- 1) RECLAMCO.IN banking and brokerage partners, if necessary;
- 2) Companies that RECLAMCO.IN plans to merge with or be acquired by (should such a combination occur, RECLAMCO.IN will notify You and will require that the newly combined entity follow these terms with respect to Your Personal Data);
- 3) Third party identification service providers for fraud prevention purposes;
- 4) Law enforcement, government officials, or other third parties when RECLAMCO.IN are compelled to do so by a subpoena, court order, or similar legal procedure; or RECLAMCO.IN believes in good faith that the disclosure of Personal Data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of RECLAMCO.IN policies;
- 5) RECLAMCO.IN Personal Data processing counterparties or agents, hired by or cooperating with us, who's services are required by us from the practical point of view;
- 6) Other third parties only with Your prior consent or direction to do so.

21. RECLAMCO.IN will not provide Your Personal Data to any other Website users or third parties other than described in clause 20 herein without Your consent or direction.

22. RECLAMCO.IN will not sell or rent Your Personal Data to third parties.

23. RECLAMCO.IN may combine Your Personal Data with information RECLAMCO.IN collects from other companies and use it to improve and personalize the Website and RECLAMCO.IN App, as well as our content and advertising.

24. RECLAMCO.IN may use Your name and email address to provide You with information about products or services that may be of interest to You, but RECLAMCO.IN will not use Your Personal Data without complying with applicable laws and, where appropriate, obtaining your consent.

25. RECLAMCO.IN services may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If You follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that RECLAMCO.IN does not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location data. Please check these policies before You submit any personal data to these websites or use these services.

## **RETAIN INFORMATION**

26. In accordance with Applicable Law and as needed to provide services to RECLAMCO.IN Participants, RECLAMCO.IN may hold Your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. RECLAMCO.IN may retain Your Personal Data for as long as You possess RECLAMCO.IN Tokens and/or use the Website or the RECLAMCO.IN App. Moreover, Your Personal Data may be hold beyond the abovementioned period till it is indispensable for RECLAMCO.IN to have relevant information to respond to any issues that may arise later.

#### **SECURITY**

27. RECLAMCO.IN uses relevant electronic and procedural safeguards to protect the privacy of the information the Participant provides to RECLAMCO.IN from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Please note that RECLAMCO.IN are not liable for the security of any data Participants are transmitting over the Internet, or third party content.

#### **CHANGE/UPDATE/DELETE PERSONAL DATA**

28. You have a right to demand RECLAMCO.IN to provide You access to Your Personal Data and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting RECLAMCO.IN . Nevertheless, this request must comply with RECLAMCO.IN General Terms & Conditions of RECLAMCO.IN Tokens Sale and RECLAMCO.IN legal obligations.

#### **AMENDMENTS**

29. RECLAMCO.IN reserves the right to modify or amend this Policy at its own discretion.

If such modifications or amendments will occur, RECLAMCO.IN shall notify the Participants. Your continued usage of the Website shall mean Your acceptance of those modifications and amendments.