



LIBERTYLANCE PRIVACY POLICY

Last updated: 28.02.2018

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 the LibertyLance.
2. Throughout this Policy, LibertyLance 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). LibertyLance 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 LibertyLance General Terms & Conditions of LTN Tokens Sale. In terms not regulated by this Policy, the LibertyLance General Terms & Conditions of LTN 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 LibertyLance General Terms & Conditions of LTN Tokens Sale.
5. It is understood and presumed that by the fact of the Website use and purchase of LTN Tokens or by providing LibertyLance 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 LTN Tokens.

COLLECTION, PROCESSING AND USE OF PERSONAL DATA

6. The purpose of personal data collection, storage and processing within the LibertyLance project shall only be the identification of the LibertyLance Token purchaser – Participant of the LTN Tokens Sale and when a user registers on our site to participate in the bounty campaign.
7. LibertyLance collect Personal Data from running the Website and use Personal Data, provided to LibertyLance by You. When the Participant visit the Website or use our products, LibertyLance collect the Personal Data sent to LibertyLance by Your computer, mobile phone, or other access device. This Personal Data includes:
 - (1) Your IP address;
 - (2) Device information including, but not limited to, identifier, name, and type, operating system;
 - (3) Mobile network information;
 - (4) Standard web log information, such as Your browser type, and the pages You accessed on LibertyLance Website.

When the Participant use a location-enabled device with LibertyLance Website and products, LibertyLance 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, LibertyLance 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 want to purchase LTN Tokens or participate in the bounty campaign, LibertyLance collect and store the following types of Personal Data about You:

- (1) Your name and surname;
- (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) LibertyLance 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. LibertyLance reserve LibertyLance right to request basic Personal Data, described in clauses 8 and 9, prior to purchase of LTN Tokens and/or use of any services, available through the Website. LibertyLance may refuse the Participant access to the Website in case if LibertyLance have grounded doubts as to validity, authenticity and genuineness of the Personal Data, provided by the Participant.

11. If the Participant does not provide LibertyLance with the Personal Data as specified in clauses 8 and 9 (if specifically asked). hereof, the Participant shall not be able to use the full functionality of the Website and purchase LTN Tokens and/or use the LibertyLance platform. At that, LibertyLance shall not bear any liability for such possible incomplete use.

12. When the Participant access the Website or use LibertyLance products or services LibertyLance (or Google Analytics, Facebook, Twitter or similar service provider on our behalf) may place small data files called cookies on the Participant's computer or other device. LibertyLance use these technologies to recognize You as our Token Sale Participant, customize LibertyLance Website 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. LibertyLance collect from the Participants only the Personal Data that LibertyLance need for their proper use of the Website or for purchase of LTN Tokens. In particular, LibertyLance use the Participant's Personal Data to:

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

14. The LibertyLance is the only data controller and processor, except for the cases when there is an objective LibertyLance need to control/process or store Personal Data at LibertyLance's counterparties (such as facebook or twitter) or agents. Should such counterparty or agent be engaged by the LibertyLance, LibertyLance shall notify You in advance.

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

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

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

PERSONAL DATA PROTECTION AND SHARING

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

19. LibertyLance store and process Your Personal Data on LibertyLance servers in various jurisdictions, where our facilities and/or LibertyLance service providers are located. By submitting Your Personal Data, You agree to this transfer, storing, or processing. LibertyLance will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Policy. LibertyLance protect 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 LibertyLance use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. LibertyLance also authorize access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. 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, LibertyLance will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

20. LibertyLance is sometimes required to compare the Personal Data You provide to third party databases in order to verify its accuracy and confirm Your identity. This allows LibertyLance to comply with relevant anti-money laundering (AML) regulations and “know your customer” (KYC) regulations.

21. LibertyLance will not share Your Personal Data with any third parties other than LibertyLance respective identity verification partners. LibertyLance reserve our right to share Your Personal Data with:

- (1) LibertyLance banking and brokerage partners;
- (2) Companies that LibertyLance plan to merge with or be acquired by (should such a combination occur, LibertyLance will notify You and will require that the newly combined entity follow these terms with respect to Your Personal Data);
- (3) 3rd party identification service providers for fraud prevention purposes;
- (4) Law enforcement, government officials, or other third parties when LibertyLance are compelled to do so by a subpoena, court order, or similar legal procedure; or LibertyLance believe 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 LibertyLance policies;
- (5) LibertyLance 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) Companies, whose technology LibertyLance may use during the Token Sale, such as, but not limited to, Facebook and Twitter.

(7) Other third parties only with Your prior consent or direction to do so.

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

23. LibertyLance will not sell or rent Your Personal Data to third parties.

24. LibertyLance may combine Your Personal Data with information LibertyLance collect from other companies and use it to improve and personalize the Website and our products, as well as our content and advertising.

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

26. LibertyLance 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 LibertyLance do 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

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

SECURITY

28. LibertyLance use relevant electronic and procedural safeguards to protect the privacy of the information the Participant provide to LibertyLance 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 LibertyLance are not liable for the security of any data Participants are transmitting over the Internet, or third party content.

CHANGE/UPDATE/DELETE PERSONAL DATA

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

AMENDMENTS

30. LibertyLance reserves the right to modify or amend this Policy at its own discretion. If such modifications or amendments will occur, LibertyLance shall notify you via email. Your continued usage of the Website shall mean Your acceptance of those amendments.