

## PRIVACY NOTICE

Welcome to the privacy notice of Easybizzi.

Easybizzi, <https://easy-bizzi.com/>, is an internet community supported by TFH CYPRUS LTD, acting as a trustee.

TFH CYPRUS LTD is a company registered in Cyprus with company registration number HE 345917 and its registered office at Thessalonikis, D. NIKOLAOU PENTADROMOS CENTER, FLOOR 6, FLAT 609, BLOCK A, 3025, Limassol, Cyprus.

Easybizzi respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our Site (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This document is written in English. To the extent that any translated version of this document conflicts with this English version, this English version shall prevail.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

### 1. Important information and who we are

#### Purpose of this privacy notice

This privacy notice aims to give you information on how Easybizzi collects and processes your personal data through your use of this Site, including any data you may provide through this Site when you create an Easybizzi Account.

This Site is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### Controller

TFH Cyprus LTD is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us by [trustee@easy-bizzi.com](mailto:trustee@easy-bizzi.com)

You have the right to make a complaint at any time to the applicable supervisory authority for data protection issues in your jurisdiction. Before you approach the supervisory authority so please contact us in the first instance.

#### Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25 May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### Third-party links

This Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy notice of every website you visit.

## 2. **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier,
- **Contact Data** includes delivery address, email address and telephone number.
- **Financial Data** includes BTC address.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Site.
- **Profile Data** includes your username and password, purchases or orders made by you.
- **Usage Data** includes information about how you use our Site, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Site feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade

union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### If you fail to provide personal data

Where we need to collect personal data by law, or under our Terms of Use and you fail to provide that data when requested, we may not be able to provide you the access to our Site as well as to your Easybizzi Account. In this case, we may have to limit your access to our Site as well as to your Easybizzi Account but we will notify you if this is the case at the time.

### 3. **How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an an Easybizzi Account;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.

### 4. **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we provide you the access to our Site as well as Community Educational Programs.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new Candidate for Community Members	(a) Identity (b) Contact (c) Financial	Your access to our Site as well as Community Educational Programs
To process and deliver your order including:  (a) Manage payments	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Your access to our Site as well as Community Educational Programs
To manage our relationship with you which will include:  (a) Notifying you about changes to our Terms of Use or Terms of Participation in the Community Distribution Program or Marketing Plan or Privacy Policy  (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Your access to our Site as well as Community Educational Programs  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how users use our Site as well as Community Educational Programs)
To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)  (b) Necessary to comply with a legal obligation
To deliver relevant Site content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how users use our Site as well as Community Educational Programs, to develop them, to promote and develop the Community and to inform our marketing strategy)

	(f) Technical	
To use data analytics to improve our Site, Community Educational Programs and other products/services, marketing, users and Community Members relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of users for Community Educational Programs as well as for other products and services, to keep our Site updated and relevant, to promote and develop the Community and to inform our marketing strategy)
To make suggestions and recommendations to you about products or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop Community products/services and promote and develop the Community)

### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

#### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased Community Educational Programs as well as other products/services and, in each case, you have not opted out of receiving that marketing.

#### Third-party marketing

We will not share your personal data with any company outside Easybizzi for marketing purposes.

#### Opting out

You can ask us to stop sending you marketing messages at any. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a Community Educational Programs purchase or other transactions.

### Cookies

Easybizzi uses cookies or similar technologies in order to collect certain information about the use of our Site when you access, view and use our Site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Site may become inaccessible or not function properly.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Third parties to whom we may choose to transfer the Site or other relevant assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

How long will you use my personal data for?

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.

By law we have to keep basic information about Community Members as stated in our Site's Terms of Use (including Contact, Identity, Financial and Transaction Data) for five years after they cease being Community Members or from the date of transaction on our Site to fulfil obligations prescribed by anti-money laundering laws.

In some circumstances you can ask us to delete your data.

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.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please review the Glossary at the end of this policy to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us by [trustee@easy-bizzi.com](mailto:trustee@easy-bizzi.com)

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. **Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means, following your registration on the Easybizzi Site, the interest to create, promote and develop an online platform of mass online education using advanced technologies in order to obtain and share knowledge, goods and services between individuals and organisations around the world. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Access to Community Educational Programs** means processing your data where it is necessary to give you an access to Community Educational Programs or to take steps at your request before being given access to Community Educational Programs.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **YOUR LEGAL RIGHTS**

You have the right to:

**1 Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**2 Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**3 Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**4 Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**5 Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**6 Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**7 Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.