

# COOKIES AND PRIVACY POLICY

Last updated: April 1, 2018

Lancerport OÜ, a company established and existing under the laws of Estonia, with the registry code 14391062, located at Harju maakond, Kuusalu vald, Pudisoo küla, Männimäe, 74626 (hereinafter “FreelancerCoin” or “FreelancerCoin Team”) connects professional freelancers with FreelancerCoin clients and enables to set up smart contracts through the online platform <https://www.freelancercoin.io> (the “Website”).

## COOKIE USE

Cookies are used on this website, [freelancercoin.io](https://www.freelancercoin.io). They help us to improve the functionality – and the usability – on our website. By visiting our website, you accept our use of cookies.

### Use of Cookies

FreelancerCoin or its partners may use small data files (cookies) or pixel tags to recognize user as a returning user, customize its services, content and advertising, evaluate marketing activities, and collect information about computer or other device used for accessing the Website. FreelancerCoin may use various cookies, including but not limited to session cookies, persistent cookies, and “flash cookies.” Cookies used by the FreelancerCoin can be blocked. However, blocking or disabling FreelancerCoin’s cookies may interfere the usage of FreelancerCoin Website. FreelancerCoin is not obligated to place cookies on your computer and may do it at its own discretion.

### What is a cookie?

A cookie is a small file stored on your IT device when visiting our website. Cookies enable us to register your visits to our website – anonymously – as they allow for recognition of your computer and IP address. Cookies are files or pieces of information that may be stored on your computer (or other internet enabled devices, such as a smartphone or tablet) when you visit a Unilever Site. A cookie will usually contain the name of the website from which the cookie has come from,

the "lifetime" of the cookie (i.e. how long it will remain on your device), and a value, which is usually a randomly generated unique number.

We do our utmost to respect users' privacy. We use cookies to monitor and improve our services, but they do also allow us to sell advertising space, which helps keep us free to our readers. We sometimes include links on our site to goods and services offered by third parties and we may be paid some commission if you subsequently decide to make a purchase. Cookies may be used to track your visits to third party sites to help ensure that we are paid the correct amounts. Please note that these commercial arrangements do not influence our editorial content in any way.

**How do we use cookies?**

Cookies allow for collection of information about the pages you visit and which technology you use.

There are two types of cookie:

Persistent cookies remain on a user's device for a set period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

Session cookies are temporary. They allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Once you close the browser, all session cookies are deleted.

Our use of cookies does not enable us to identify you as user of our website as the information collected is anonymous, and we do not pass on information to third parties.

"The executive order on requirements for information and consent by the storage of or access to information on end-user terminal equipment" requires that the user receives information about the use of cookies or other technologies, and that an informed consent is given by the user.

**Which cookies do we use?**

Among other types of cookies, we use Google Analytics. It is able to collect information on how users navigate on the website. Google Analytics uses various cookies for this purpose.

**How long is a cookie stored on your computer?**

It varies from cookie to cookie how long it is stored before it is deleted. Cookies will be renewed every time you visit our website.

**How to avoid and delete cookies**

**Most internet browsers are initially set up to automatically accept cookies. You can change the settings to block cookies or to alert you when cookies are being sent to your device. There are a number of ways to manage cookies. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings.**

**However, please note that if you deselect cookies, you may not be able to use certain services and features in the future. If you deselect cookies in your browser, this will apply to all websites. You may change your browser settings at any time; likewise, you may withdraw your consent if you regret it.**

## **PRIVACY POLICY**

**This Privacy Policy shall be applied to freelancers and clients using FreelancerCoin services and users using the Website for purchasing FreelancerCoin tokens (hereinafter jointly as “user”).**

**FreelancerCoin Team respects the privacy and is committed to protect the personal information that the user shares in order to use FreelancerCoin services or any other features, technologies or functionalities offered on the Website. Hereby we will give an overview of the data being collected, the legal basis for the processing of personal data, how we use personal data, third parties involved in the processing procedures, safeguards applied in order to secure collected data, and user’s rights regarding the collected data.**

**Privacy Policy is established in accordance with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council.**

### **Collection of Information and legal basis for the processing**

**In using the Website and/or FreelancerCoin services, the user is asked to voluntarily provide his personal information, including but not limited to his name, email address, and telephone number.**

**In addition, user may provide some information involuntarily such as any information sent to FreelancerCoin by user’s computer, mobile phone or other access device. This information may include IP address, device information, including but not limited to identifier, name and type, operating system, location, mobile network information and standard web log information, such as browser type, traffic to and from Website and the pages accessed on Website.**

**FreelancerCoin Team may also collect personal information from or about the user in other ways, such as his interaction with customer support or contractual relationships with FreelancerCoin.**

**User's personal information is being processed by the FreelancerCoin Team upon user's permission, which is granted by accepting FreelancerCoin Terms of Use and this Privacy Policy.**

### **Setting up and Using an Account.**

**In order to FreelancerCoin services can be used only via personal account. In creation of the personal account the following personal information shall be provided: name, email address and.**

**If the user wants to transfer his FreelancerCoin wallet to other account or wallet, then it is required to provide information about the destination for the payment (bank account, wallet, etc.) so FreelancerCoin can perform a transaction.**

**FreelancerCoin may require the user to provide additional information to verify his identity, address or any other information in his account, such as date of birth, copy of ID, citizenship, country of residence, and other information. If fiat currencies must be transferred on request of account holder, FreelancerCoin may request additional information to confirm that account belongs to the same user.**

**Personal information provided during the account creation can be reviewed by logging in. The user can edit his personal information or delete his account by contacting FreelancerCoin support team at [support@FreelancerCoin.io](mailto:support@FreelancerCoin.io).**

**Upon cancellation or dilatation of the account, FreelancerCoin Team may keep personal information provided therein in its database until it is reasonably necessary. For example to deter fraud by ensuring that a person who tries to commit fraud will not be able to avoid detection simply by closing his/her account and opening a new account. However, if the account is being deleted, the personally identifiable information will not be used by FreelancerCoin for any further purposes, nor sold or shared with the third parties, except as necessary to prevent fraud or money laundering and assist law enforcement in accordance with this Privacy Policy.**

### **Use of Log Files**

**FreelancerCoin may use the log files to collect Internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, and number of clicks to analyze the activity on the Website, collect geographic and demographic information, and evaluate content of the FreelancerCoin Website. Information collected from log files is not personally identifiable. FreelancerCoin is not obligated to use log files and may do it at its own discretion.**

### **Transferring, Storing and Using Your Personal Information**

**FreelancerCoin may transfer your personal information to third parties, such as legal and regulatory authorities; accountants, auditors, lawyers and other outside**

professional advisors; and to companies that provide services to FreelancerCoin (such as payroll, performance management, IT systems suppliers and support; data analysis or other outsourcing providers). FreelancerCoin has taken steps to ensure that these service providers protect the confidentiality and security of personal information, and to ensure that personal information is processed only for the provision of the services and in compliance with applicable law.

Such third parties may be located in countries outside of the European Economic Area (“EEA”) whose privacy regulations may differ and which are not subject to adequacy decisions of the European Commission. In those countries the security of the personal information (inc. protection against misuse, unauthorized access, disclosure, alteration or destruction) may not be ensured as it is secured in European Union, due to the lack of adequate data protection level.

When transferring collected personal information outside of European Economic Area, FreelancerCoin shall ensure the application of the appropriate safeguards. If you wish to receive a copy, please contact us as instructed below.

For storing purpose, FreelancerCoin is transferring collected personal information to US. FreelancerCoin shall ensure that the recipient of the information is certified in accordance to the EU-US Privacy Shield entered by and between the U.S. Department of Commerce and the European Commission. To learn more about the Privacy Shield program, please visit <https://www.privacyshield.gov/>.

FreelancerCoin does not sell or rent collected personal information to third parties for their marketing purposes without the user’s explicit consent. FreelancerCoin may use collected personal information to customize the use of FreelancerCoin Website and services; analyze the activity on FreelancerCoin’s Website, including through third parties such as Google Analytics and alike; evaluate and improve its marketing efforts and for other reasons relevant to the user’s use of FreelancerCoin’s Website and services.

User who uses FreelancerCoin service, in order to find suitable freelancers to fulfil its projects, is processing freelancer’s personal data and is therefore considered as a data processor. The user is obligated to process personal data disclosed to him only in accordance with this Privacy Policy.

#### **User’s rights**

User has the right to request access, erasure and removal of its personal data from FreelancerCoin’s active files in the event the law prescribes such right. User is also entitled to raise concerns about the handling of his personal data to FreelancerCoin or to a Data Protection Supervisory Authority.

#### **Change of Privacy Policy**

FreelancerCoin may amend this policy at any time and in its own discretion by posting an updated version on FreelancerCoin Website. The updated version

**becomes effective at the time of posting. It is your responsibility to check updates regularly.**

## **Contact Us**

**If you have any concerns or questions regarding to the handling of your personal information then you may contact with the data protection officer designated in FreelancerCoin [seungki.yeo@freelancercoin.io](mailto:seungki.yeo@freelancercoin.io) or FreelancerCoin Support team [support@freelancercoin.io](mailto:support@freelancercoin.io).**