

## DATA PROTECTION DECLARATION

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Data Protection Declaration of Telluria GmbH, Heiligenstädter Lände 29/2, 1090 Vienna ("Telluria"; "we") concerning the website <https://www.telluria.at/> ("Website")

Thank you for your interest in the services of Telluria. The protection of your privacy and thus the protection of your (personal) data is our highest priority. The following declaration is intended to provide you with comprehensive information on (i) what data we collect, (ii) how we deal with it, and (iii) what rights you have. At the same time, we therewith fulfil our duties imposed by the General Data Protection Regulation of the European Union (the "GDPR"), enforceable from 25 May 2018, the Austrian Telecommunications Act ("TKG") and other relevant laws.

Data protection laws are generally relevant in case any processing of personal data is concerned. The terms used within the scope of this data protection declaration are defined in and by the GDPR. As such, the wide definition of "processing" of personal data means any operation or set of operations performed on personal data, such as, but not limited to, recording, organization, storage, alteration, and transmission of personal data. Any information allowing us or third parties to potentially identify you in person can be considered personal data. This terminology may also apply to IP addresses as long as they allow e.g. Internet Service Providers such identification.

### Processing of Data related to the use of the Website

By accessing our Website, the external IP address of your computer will be stored and logged for statistical, verification and organizational purposes. Our services – offered via our Website – are designed to be used without indication of any additional personal data. IP addresses are stored for a period of one year, after which the data shall be deleted unless a longer time period is necessary for compliance with legal obligations.

We will not transfer any of these personal data to third parties without explicit prior consent.

### Processing of Data following the Participation in the Initial Token Offering

If you decide to participate in Our Initial Token Offering ("ITO"), which will take place in the limited offer period beginning on 7 May 2018 08:00 CET and ending on 2 July 2018 08:00 CET, we will collect certain data (see below) in order to provide our services. For more detailed information on the ITO please review the Website, our Whitepaper as well as the Token Offer Document. To participate, you are required to indicate your **full name, address, citizenship, date of birth, telephone number, email address and wallet address**. In case of a legal entity, the mentioned data except the Ethereum wallet are required from the beneficial owner and in addition, name of the legal entity, registration number, place of registration, seat, business address and Ethereum wallet of the legal entity must be mentioned. Wallet addresses are not considered personal data.

These data serve the purpose of processing the Exchange Request as well as executing the Token Exchange Agreement. (Art 6 para 1 lit b GDPR, "necessary for the performance of a contract") and are further required by Telluria to fulfil all relevant legal requirements (Art 6 para 1 lit c GDPR,

"necessary for compliance with legal obligations to which the controller is subject"), whereas they – without any legal obligation – will not be transferred to third parties. Your personal data will be stored for as long as we reasonably consider necessary for performing the ITO and as is permissible under applicable law. We will, in any case, retain your personal data for as long as there are statutory retention obligations or potential legal claims are not yet time-barred.

### **Rights of the Data Subject**

A central aspect of data protection regulations is the implementation of adequate opportunities to allow for the disposition of personal data, even after the processing of said personal data has occurred. For this purpose, a series of rights of the data subject are set in place. Telluria shall comply with your corresponding requests to exercise your rights without undue delay and in any event within one month of receipt of the request. To ensure the exercise of your rights, we provide for a contact address where you can exercise those rights in an easy manner: [info@telluria.at](mailto:info@telluria.at). Specifically, the following rights are entailed:

- (i) Right to information and access to personal data: should you exercise your right to information, we shall provide you with all relevant information regarding the processing of your personal data by Telluria, permitted to the extent of the law. As we are processing very little personal data in order to provide our services, we may not be able to identify your person by any means. Thus, we may only be able to provide information by requesting additional data to verify your status. This may apply to the other rights of the data subject as well.
- (ii) Right to rectification: With this right, you may request the rectification of inaccurate or incomplete personal data (e.g. email addresses).
- (iii) Right of data portability.
- (iv) Right to object to processing.
- (v) Right to erasure: We are obliged to delete personal data (name, email address) upon your request as you may withdraw your consent at any time.
- (vi) Right to restriction of processing: restriction may be requested (i) for a verification period if the accuracy of the data is contested, (ii) if the processing is unlawful.
- (vii) Right to lodge a complaint with a supervisory authority.

### **Data Security**

Telluria will protect processed data adequately against unauthorized access (of third parties) in accordance with the provisions of the legal framework of Austria as well as the European Union. We will only process data which are essential to provide our services. Measures are taken with regard to (i) the quantity of data collected, (ii) the extent of data processing, (iii) the storage time as well as (iv) the accessibility of data. Data will not be used or stored by other means than set out in this Data Protection Declaration and are made accessible only to a restricted and necessary number of persons, whereby any processing of personal data is strictly limited to the specified and legitimate purpose. All employees of Telluria have been informed about applicable data protection

provisions as well as data security measures and are bound to our privacy practices. Our web presence and other systems are adequately protected by a variety of security mechanisms.

Telluria will not transfer any of your personal data to third parties without explicit prior consent. Further, if processing of personal data in the future should be carried out on behalf of Telluria by a so called processor (a third party), this processing will be governed by specific contracts obliging the processor to comply with our Data Protection Declaration, to effectively ensure the protection of your rights as described above.

## Cookies

Our Website uses "cookies". Cookies are small text files, which are stored on your computer in order to enable certain functions and thus make the Website more user-friendly. Please note that certain cookies are set as soon as you visit the Website. Depending on your browser software, you may have the option to configure how cookies are to be treated (e.g. deletion of cookies upon closing the browser, forbidding third-party cookies or cookies in general). Please be advised that restricting cookies may limit the functionality of our Website.

To learn about your cookie management options with the most common browsers, please use the following links:

- Internet Explorer™: <https://support.microsoft.com/de-de/help/17442/windows-internet-explorer-delete-manage-cookies>
- Edge™: <https://www.netzwelt.de/news/155267-microsoft-edge-cookies-blockieren-verwalten-loeschen.html>
- Safari™: <https://www.verbraucher-sicher-online.de/anleitung/cookies-verwalten-in-apple-safari>
- Chrome™: <http://support.google.com/chrome/bin/answer.py?hl=de&hlrm=en&answer=95647>
- Firefox™ <https://support.mozilla.org/de/kb/cookies-erlauben-und-ablehnen>
- Opera™: <http://help.opera.com/Windows/10.20/de/cookies.html>

## Google Analytics

This Website is using the web analysis tool "Google Analytics". This service is provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("**Google**"). Google Analytics uses cookies (so called third party cookies). The information generated by the cookie concerning your use of this Website (including your IP address) is generally transferred to and stored by Google on servers in the USA. However, due to the activation of IP anonymization on this Website, your IP address will be abbreviated by Google within the member states of the European Union respectively the European Economic Area. Exceptionally, the full IP address may be transferred to a Google server in the USA to be abbreviated after such transfer has taken place. Google will use this information for the purpose of evaluating your use of the Website, compiling reports on website activity for us as well as providing other services relating to website activity and internet usage. Google may also transfer this information to third parties if required to do so by law or if such third parties process the information on Google's behalf. Google will not associate your IP address with other data stored. You may refuse the use of cookies by configuring your browser. In this case, however, you may not be able to use this Website in its full functionality and be provided with all services required.

If you wish to prevent your information from being transferred to Google, you can alternatively install an add-on for your browser to deactivate such services. You may download such add-on under <https://support.google.com/analytics/answer/181881>. Please note, however, that its availability is currently limited to Microsoft Internet Explorer, Google Chrome, Mozilla Firefox, Apple Safari and Opera. Your browser may be configured to allow third party cookies for the add-on to work.

Without your explicit consent, we will not use such tracking tool to invisibly collect personal data, share such data with third parties respectively marketing platforms or link such data with any personal information.

For more details, please review the Google Analytics security and privacy principles carefully: <https://support.google.com/analytics/answer/6004245?hl=en>.

Please also note that Google is participating in the EU-US Privacy Shield, where it is obliged to comply with the EU-US Privacy Shield Frameworks as set forth by the US Department of Commerce regarding the collection, use and retention of personal information from European Union member countries and Switzerland, respectively. Google, including Google LLC and its wholly-owned US subsidiaries, has certified that it adheres to the Privacy Shield Principles.

### **Links to websites of third parties**

As far as the Website contains external links, we hereby indicate that these third-party websites are not subject to the influence and control of Telluria. We disclaim all liability for losses or obligations related to the use of these third-party websites. We are not responsible for the contents, availability, correctness, or accuracy of these websites, nor for their offerings, links, or advertisements.

### **Contact details regarding Data Protection Issues**

In case you have any questions concerning Telluria's Data Protection Declaration or if you would like to exercise one of the rights granted by GDPR, please send us a written request outlining your desire to:

Telluria GmbH  
Heiligenstädter Lände 29/2  
1090 Vienna  
Austria

Phone: +43 1 267 6383  
E-Mail: [info@telluria.at](mailto:info@telluria.at)