



Privacy Policy

We, Tokenchampions S.C.Sp. a special limited partnership represented by R&H LUX S.à r.l. acting as general partner (“**Tokenchampions**”), with registered office in Luxembourg, thank you very much for your interest in our website and our services. The protection of your personal data is very important to us. We process these data in accordance with the provisions of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC) (the GDPR), the Luxembourg Data Protection Act dated 1 August 2018, and other applicable laws on data protection (the “**Data Protection Law**”).

In the following, we would like to inform you about the type of personal data processed during your use of our web pages, our web platform, the associated mobile applications, and our services (together the “**Tokenchampions Platform**”).

1. Data controller

The controller for data processing is **Tokenchampions** and our contact details are as follows:

R&H LUX S.à r.l.
16 rue Robert Stümper
L-2557 Luxembourg
Grand Duchy of Luxembourg
info@tokenchampions.com

2. Categories of data we are processing

In the following we would like to inform you which data we are processing when you visit our web pages and use the **Tokenchampions Platform**.

“**Data**” or “**Personal data**” means any information relating to an identified or identifiable natural person, hereinafter also referred to as “**data subject**”; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to identity of that natural person.

For the purposes of this privacy policy, you, as a user of the website and the **Tokenchampions Platform** if you have created your own account, are considered as a data subject.

Processing of access data relating to the visit of our web pages: If you only access our web pages without creating an account, you may usually do so without providing any personal data. We only store access data such as date and time of your visit, the website from which you visit us, your browser’s type and language settings, the web pages you visit on our website, the amount of data transferred and the requesting provider.



Data provided to us by you: Within the scope of your use of our services, when using the **Tokenchampions** Platform, when contacting us, we process the data provided to us by you. The relevant data input form will usually indicate the type of data involved. In particular, this relates to:

- **Identification data** of investor qualifying as natural persons as well as identification data of investor's representative(s) and/or authorised signatories and/or ultimate beneficial owners (UBO) when investor qualifying as institutional investor, including:
 - e-mail address and password,
 - first name and last name,
 - gender,
 - nationality,
 - residential address,
 - telephone number,
 - birthdate and birthplace,
 - sector of activity,
 - tax identification number,
 - ID card or Passport details,
 - proof of residence;
- **Investing related information**, including intended investment amount, source of funds;
- **Payment data** such as the payment method and the credit card details;

Data that we receive about you from third parties: To the extent necessary for us and where permissible under Data Protection Law, we may collect data about you from third parties.

Cookies: We use "cookies", technical information that is stored on a user's computer, to make it more attractive for you to visit our web pages, to enable you to subscribe to our services, or to use other functions. Cookies allow us in particular to adapt our web pages to user needs by collecting statistical information about user behaviour.

Some of the cookies we use are deleted after the end of the respective browser session, i.e., after the user closes the browser ("session cookies"). Other cookies will remain on the user's device and enable us to recognise the browser upon the user's next site access ("persistent cookies").

Additional information on cookies and similar technologies used by us is found further below in this Privacy Policy and in our cookie consent tool, which also allows you to change your cookie preferences at any time. Depending on your selected settings, some functionalities of our web pages may be limited.

3. Purposes of the data processing

We process your data for the following purposes:

Provision of our website / **Tokenchampions Platform:** Where we process access data as part of your visit of our web pages, this is done to ensure problem-free operation of the web pages and to improve our offerings and services.



The legal basis for this data processing is Article 6 (1) (b) GDPR, as the processing is necessary to ensure the functionality of our web pages and to deliver their contents correctly. In addition, the data serve to optimise our websites and to ensure the security of our IT systems; in this respect, the data processing is based on Article 6 (1) (f) GDPR.

Contact: If you contact us by telephone, e-mail or via an online form, we process the data provided by you on the basis of Article 6 (1) (b) GDPR to the extent necessary to process your request and to be able to prove that you have contacted us in accordance with legal requirements.

Contract-related data processing: If you create your own account through the **Tokenchampions** Platform, we process the data provided by you on the basis of Article 6 (1) (b) GDPR. This is necessary to establish and manage your account and is therefore necessary for the performance of the contract of use or in order to take steps at your request prior to entering into a contract, in particular when you create your own account.

Regulatory obligations: If you subscribe to our services, we process the data provided by you on the basis of Article 6 (1) (c) GDPR. This is necessary to comply with legal or regulatory obligations, anti-money laundering law and counterterrorist financing law (such as carrying out Know Your Customer (KYC) and Anti-Money Laundering (AML) verifications, sanctions screening) and tax law (such as reporting under the FATCA Law and the CRS and similar laws and regulations in Luxembourg or at OECD or EU level). In this context, you will be required to provide, regardless of the invested amount, identification documentation such as ID Card or passport, and proof of residence such as an invoice not older than three months. Furthermore, and depending on the invested amount, you will be required to provide tax auto-certification documentation, and proof of source of funds.

Customer support and customer service: During your subscription to our services, we may contact you via the contact data provided by you, where this should be necessary, to make suggestions to optimise your service or because of important information in connection with your subscription. The legal basis for this data processing is, as part of the performance of the contract, Article 6 (1) (b) GDPR.

Direct advertising after subscribing to our services: If you subscribe to our services, we may send you information about our own similar services to your e-mail address. The legal basis for this data processing is Article 6 (1) (f) GDPR, because the advertising of related products by way of direct advertising represents a legitimate interest for us. The basis for direct advertising by e-mail is additionally article 11 of the e-Privacy law dated 30 May 2005. You may at any time object to the processing of your data for the purpose of direct marketing. We will then refrain from further processing for any such purposes.



Marketing, web analytics and social media: We use cookies and similar for marketing and analysis purposes, to make visiting our websites and to enable you to use certain functions. The legal basis for this is your consent (Article 6 (1) (a), Article 7 GDPR) or the protection of our legitimate interests (Article 6 (1) (f) GDPR).

Detailed information on all cookies and similar technologies used can be found in our cookie consent tool, which also allows you to change your cookie preferences at any time and to revoke your consent to the use of cookies with effect for the future. Depending on your selected settings, some functionalities of our web pages may be limited.

4. Data transfer to third parties

Your data will only be transferred to our carefully selected service providers and partner companies who are contractually obligated to comply with requirements of Data Protection Law. Otherwise, your data will only be transmitted in the event of an existing legal obligation. In the following you will find information about the companies to which we transfer data.

Transfer within affiliated companies: We may transfer your data to our affiliated companies for storage in central databases and for internal group billing and accounting purposes in connection with the conclusion and performance of the contract. The legal basis for this data processing is either Article 6 (1) (b) GDPR or Article 6 (1) (f) GDPR.

Transfer to service providers: We use several service providers that are working on our behalf to operate and optimise our web platform, to perform contracts and to process payment transactions. This relates, for example, to the hosting of our platform, the placement of advertising, the processing of payment transactions, as well as customer service and support. We transfer data to these service providers to the extent necessary for the provision of our services and the performance of contracts or where it serves to protect our legitimate interests. The legal basis for this data processing operations is usually Article 6 (1) (b) GDPR or Article 6 (1) (f) GDPR. These service providers mainly work for us as “processors” on our behalf and may therefore use the data provided exclusively in accordance with our instructions. We are legally responsible for appropriate data protection policies at the service providers which are processing data on our behalf and have agreed appropriate data protection and data security regimes with the service providers.

Here you will find a list of our service providers:

- **“Tokeny Solutions”** – is a service of Tokeny S.à.r.l. a company with registered address at L-1911 Luxembourg, 9 Rue du Laboratoire, and registered with the trade and companies registry under number B218805. We use Tokeny Solutions as a partner for providing the token digital asset offering, meaning the issue of tokens representing underlying securities or any other type of financial or non-financial assets.
- **“Hubspot”** - is a service of Hubspot Inc, a company with registered address at 25 First Street, 2nd Floor, Cambridge, MA 02141 USA. We use Hubspot services as our CRM (Customer



Relationship Manager) platform to provide support to our Marketing, Sales and Support operations.

- **“Amazon Web Services”** - is a service of Amazon Web Services a company with registered address at 410 Terry Avenue North, Seattle, WA 98109-5210, USA. We use Amazon Web Services as a partner for parts of our server infrastructure. Amazon Web Services offers one of the most secure, innovative and carefully maintained data center infrastructures. This is where our servers are hosted, and data is stored using very high security standards. This environment provides us with state-of-the-art security technologies to protect your data from misuse.
- **“AlphaFX Solutions”** and **“Olkypay Solutions”** – are services of Alpha FX Europe Limited a company with registered address at 171, Old Bakery Street, Valletta VLT 1455, Malta and registered with the Companies Registry of Malta under registration number C96623 and Olky Payment Service Provider S.A. a company with registered address at 7A, rue de Turi L-3378 Livange, and registered with the Trade and Companies Registry under number B 165776. We use AlphaFX and OlkyPay as partners for banking and payments services.
- **“Tangany Solutions”** – is a service of Tangany GmbH, a company with registered address at Agnes-Pockels-Bogen 1, 80992 Munich, Germany being a crypto custodian supervised by the Federal Financial Supervisory Authority (“BaFin”). We use Tangany Solutions as a partner for custody of crypto-assets.
- **“Finimmo Solutions”** - is a service of FINIMMO LUXEMBOURG S.A., a company with registered address at 18, Rue Robert Stumper L - 2557 Luxembourg, and registered with the Trade and Companies Registry under number B94364. We use Finimmo Solutions as a partner for administration functions and corporate agency services in Luxembourg.
- **“Onfido Solutions”** - is a service of Onfido Limited, a company incorporated and registered in England and Wales with company number 07479524 whose registered office is at 3 Finsbury Avenue, London EC2M 2PA, United Kingdom. We use Onfido Solutions as a partner for “Know Your Customer” (KYC) and Anti-Money Laundering (AML) verifications as required by law and more broadly to administer the digital asset during its existence.
- **“Checkout.com Solutions”** - is a service of Checkout SAS, a company incorporated in France with registered address at 37 - 39 Rue de Surène, 75008 Paris, France and registered with the French company register under number FR02841033970. We use Checkout.com Solutions as a payment service provider.

Payment transactions: The respective payment service provider or bank receives the necessary payment data for the processing of payment transactions. The legal basis for the data processing is Article 6 (1) (b) GDPR. Generally, however, you enter this information directly in the input window of the respective payment service provider or bank. In these cases, we do not receive and store any payment data.

Transfer to third countries: Specific legal requirements apply to the transfer of personal data out of the EEA. The “transfer” of data includes sending data to another country or allowing that data to be accessed remotely in another country, regardless of whether **Tokenchampions**



transfers personal data outside the EEA itself or a data processor does so when acting on **Tokenchampions'** behalf.

Personal data must not be transferred outside the EEA unless the recipient country ensures an adequate level of protection for the rights and freedoms of data subjects. This requirement can be satisfied by:

- the recipient country having been subject to an “adequacy determination” by the European Commission (such as Canada and Israel);
- the entry into a data transfer agreement between the Company and the non-EEA recipient of the personal data which contains standard contractual clauses that have been approved by the European Commission; or

Tokenchampions will ensure that any transfer outside the EEA will be subject to appropriate safeguards or is otherwise permitted under applicable law. You may obtain a copy of these safeguards by contacting **Tokenchampions**.

Transfer to other third parties: Otherwise, we only transfer your data to third parties or to official authorities if we are legally obligated to do so under existing Data Protection Law or under regulatory requirements, such as due to official or court orders, or if we are entitled to do so, e.g., because it is necessary for the exercise or enforcement of our rights or claims. The legal basis for the respective data processing in these cases is Article 6 (1) (c) GDPR or Article 6 (1) (f) GDPR.

5. Retention of data

Personal data must not be retained for longer than is necessary for the lawful purposes for which it is processed. To achieve this, each category of personal data processed by us must be subject to a retention period which can be justified by reference to those lawful grounds. Retention periods must be monitored, and, upon their expiry, the relevant personal data must be deleted or anonymised (so that it is no longer possible to identify the data subject to whom the personal data relates). Some data will need to be kept for longer periods than others, for example where it is necessary to retain certain records in order for the Company to comply with its legal obligations.

Personal data must be disposed of securely in a way that protects the rights and privacy of data subjects and ensures the permanent erasure of the data (e.g. shredding, disposal as confidential waste, or secure electronic deletion).

6. Your data protection rights

As a visitor of our web pages and as a user of our services, you are entitled to various rights granted by the GDPR. Please use the information in the Contact section to assert your rights against us and make sure that we are able to clearly identify your person.



In the following we explain your essential rights as a data subject.

Right of confirmation and access: A data subject has the right, granted by the GDPR, to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed; where that is the case, the data subject has a right of access to the personal data and to further information to the extent provided for by law.

Right to rectification: A data subject has the right, granted by the GDPR, to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. In this respect, taking into account the purposes of the processing, the data subject also has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure (“right to be forgotten”): A data subject has the right granted by the GDPR to obtain from the controller the erasure of personal data concerning him or her without undue delay; the controller has the obligation to erase personal data without undue delay where one of the grounds provided for by law applies and where the processing is not necessary. Excluded from the right to erasure are, for example, stored data relating to business processes that are subject to the legal obligation to retain data.

Right to restriction of data processing: As a data subject, you have the right, granted by the GDPR, to obtain from the controller restriction of processing where one of the conditions provided by law is met.

Right to object: As a data subject, you have the right, granted by the GDPR, to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you by us as controller; we will then no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms as a data subject or for the establishment, exercise or defence of legal claims.

Right to data portability: As a data subject, you have the right, as granted by the GDPR, to receive the personal data concerning you which you have provided to us as controller in a structured, commonly used and machine-readable format and you have the right to transmit those data to another controller without hindrance from us as controller to which the personal data have been provided, subject to the conditions provided for by law.

Revocation of consent: Where you may have given us your consent to process your data within the scope of your use of our web pages or as part of the use of our services, you may withdraw such consent at any time with effect for the future. The lawfulness of the processing of your data before your withdrawal remains unaffected. After receipt of your withdrawal by us, we will stop the relevant use of the data without delay. Where the use of the data was necessary for the provision of our services, there may be restrictions in relation to your use of our services.



7. Complaints to supervisory authorities

In the event of complaints regarding the processing of your data, you have the right to contact the competent supervisory authorities. You may do so by contacting the data protection authority responsible for your place or state of residence or the data protection authority responsible for us, which is the **National Commission for Data Protection (CNPD)**, 15, Boulevard du Jazz, L-4370 Belvaux (<https://cnpd.public.lu>).