

Legal
Powerchain.Energy OU
PRIVACY POLICY

1. Introduction

Why Privacy Matters to Powerchain

Powerchain provides this privacy policy to let our Users and ICO participants, know how the information collected from them will be used and disseminated through the Service and its Affiliates.

This Privacy Policy must be read within the context of Powerchain's Terms of Use, of which the terms of this Privacy Policy forms part.

It is important to Powerchain that you understand some of the concepts concerning our privacy policy in a simple and clear way and a better indication concerning what information we collect, how we collect it and what choices or rights you have concerning your data. Notwithstanding the summaries, all parties are encouraged to make use of and read the Privacy Policy in its entirety.

2. Age Requirements

The Powerchain is for the use of people over the age of 18, or where the age of consent is more than 18 for use of the Services and purchase of POWEC Tokens in their jurisdiction, then the User must be older than the age of 18.

You, accordingly, cannot use the Powerchain without the parent's or guardian's consent and therefore cannot furnish us with any of your personal information or that of your parent or guardian.

3. Data Controller

Powerchain provides the Service to Users from a range of countries and we act as our own Data Controller as defined in Article 4 of the General Data Protection Regulation 2016/679 and our details can be found on the contact us portion of website.

4. What Information do we collect

Powerchain collects information at various times whilst you make use of the Service, including when your account is created, such as payment information, location from which you are using the platform, usage and device information.

The following information is collected by and on behalf of Powerchain:

- **User Profile:** We collect information when you create or update your Powerchain account. This may include your name, email, phone number, login name and password, address, payment or banking information (including related payment

verification information), government identification numbers such as identity or Social Security number, driver's license or passport if required by law, birth date, photo and signature.

- **Payment Information:** When you use the Service to make payments, particularly payments for POWEC Tokens, we will also collect certain payment information, such as credit card, debit card, Bitcoin, Ethereum or other financial institution information
- **Demographic data:** We may collect demographic information about you, including through user surveys. In some countries, we may also receive demographic information about you from third parties.
- **User content:** We may collect information that you submit when you contact Powerchain customer support, other Users, or otherwise contact Powerchain.

Information created when you use our services

This may include:

- **Location Information**

POWEC Tokens may only be used in jurisdictions where the storage and transfer of energy, in exchange for the POWEC Tokens, is allowed between users, accordingly, Powerchain will take all reasonable steps to verify the location from which you are accessing the Services from to mitigate or prevent any risk of contravening the laws of that jurisdiction.

- **Transaction Information**

We collect transaction details related to your use of our Services, including the number of POWEC Tokens purchased, the amount the POWEC Tokens were purchased for, the particulars of the User who is purchasing the electricity and the particulars of the party selling the electricity, and payment method.

- **Usage information**

We collect information about how you interact with the Powerchain and the Services. This includes information such as access dates and times, app features or pages viewed, app crashes and other system activity, type of browser, and third-party sites or service you were using before interacting with our services. In some cases, we collect this information through cookies, pixel tags, and similar technologies that create and maintain unique identifiers. To learn more about these technologies, please see our [Cookie Policy](#).

- **Device Information**

We may collect information about the devices you use to access our services, including the hardware models, device IP address, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, and mobile network information.

Information from other sources

These may include:

- Information that we obtain from third party sources that you have authorised us to obtain information from (eg. Facebook, Google etc.);

5. How we use your information

Powerchain collects and uses information to maximise service delivery and ensure that you are aware of the full capability of the Services. We also use information we collect for: customer support, research & development legal proceedings. We will not sell your information to third parties for direct marketing purposes

Providing services and features

Powerchain uses the information we collect to provide, personalize, maintain and improve the Service. This includes using the information to:

- Ensure that the User receives the most efficient and effective experience from their use of the Service;
- Verify your identity.
- Process or facilitate payments for The POWEC Tokens so that the User may utilize the Service.
- For marketing purposes and to provide you with updates and other information about special offers and new features of the Service.
- Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends.

Safety and security

We use your data to help maintain the safety, security and integrity of our services and users. This includes, for example, identifying any parties attempting to exploit and vulnerabilities on the network through hacking or fraudulently using a User's information to illegally transact on the power chain platform. This information will allow us to notify the relevant authorities for the purposes of apprehending any perpetrators.

Customer support

Powerchain uses the information we collect (including recordings of customer support calls after notice to you and with your consent) to assist you when you contact our customer support services, including to:

- Direct your questions to the appropriate customer support person
- Investigate and address your concerns

- Monitor and improve our customer support responses

Research and development

We may use the information we collect for testing, research, analysis and product development. This allows us to improve and enhance the safety and security of our services, develop new features and products, and facilitate insurance and finance solutions in connection with our services.

Communications among users

Powerchain uses the information we collect to enable communications between our users.

Communications from Powerchain

Powerchain may use the information we collect to communicate with you about products, services, promotions, studies, surveys, news, updates and events. Powerchain may also use the information to promote and process contests and sweepstakes, fulfill any related awards, and serve you relevant ads and content about our services and those of our business partners. You may receive some of these communications based on your profile as a Powerchain user. This feature can be disabled.

Legal proceedings and requirements

We may use the information we collect to investigate or address claims or disputes relating to your use of the Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

6. Cookies and Third party Technologies

Powerchain, like many websites and our partners, affiliates, analytics, and, service providers use “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s hard disk for record keeping purposes.

The cookies and similar technologies are used for purposes such as:-

- Authenticating users
- Remembering user preferences and settings
- Determining the popularity of content
- Delivering and measuring the effectiveness of advertising campaigns
- Analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services

We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our site and use our services, as well as when you visit other online sites and services.

Please see our [Cookie Statement](#) for more information regarding the use of cookies and other technologies described in this section, including regarding your choices relating to such technologies.

7. Information Sharing and Disclosure

(DRAFT NOTE: WE WILL NEED TO SPEAK TO THE DEVELOPERS ABOUT HOW INFORMATION IS TO BE SHARED AND FOR WHAT PURPOSE)

8. Information Retention and Deletion

Powerchain maintains your personal information for the entire period that you maintain an account with Powerchain, and, following the request to delete same then it is deleted immediately by Powerchain, to the extent that it is not legally obligated to retain same.

Powerchain requires user profile information in order to provide the Services, and retains such information for as long you maintain your account.

Powerchain retains certain information, including transaction, location, device and usage information, for a minimum of 5 years after termination of your use of the Service in connection with the Money Laundering and Terrorist Financing Prevention Act or other time period as may be required for any regulatory, tax, insurance or other purpose within the jurisdiction in which you reside or operate your business.

Once such information is no longer necessary to provide Powerchain's services, enable customer support, enhance the user experience or other operational purposes, Powerchain takes steps to prevent access to or use of such information for any purpose other than compliance with these requirements or for purposes of safety, security and fraud prevention and detection.

You may request deletion of your account at any time through the Privacy Settings in the Powerchain app, or via Powerchain's website.

Following such request, Powerchain deletes the information that it is not required to retain. In certain circumstances, Powerchain may be unable to delete your account, such as if there is an outstanding credit on your account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, Powerchain will delete your account as described above.

Powerchain may also retain certain information if necessary for its legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, if Powerchain shuts down a user's account because of unsafe behaviour or security incidents, Powerchain may retain certain information about that account to prevent that user from opening a new Powerchain account in the future.

9. Special Information for European Users

Effective May 25 2018, the processing of personal data of users in the European Union is subject to the EU General Data Protection Regulation (“GDPR”)

What legal basis do we have for processing your personal data?

We are obligated to collect and use your personal information as a result of:-

Legal Obligation

- In term of Chapter 4 of the Money Laundering and Terrorist Finance Prevention Act, we are obligated to maintain and keep records of all parties transacting on our platform for a period of 5 years after you terminate your service with us for the benefit of the Financial Intelligence Units.
- Personal information, including any default payments may be required by a credit reference agency or bureau and we may be required by law to furnish the agency or bureau with the requested information.

Legitimate Interest

- The parties are aware that due to the nature and volume of transactions, including the retention of sensitive information such as credit card, debit card and similar information, personal information is retained to mitigate the risk of fraud and report any perpetrators to the relevant authorities.
- Personal information shall accordingly be retained in order to maintain the network security of the Powerchain platform, so that any parties attempting to hack or compromise the network security may be reported to the relevant authorities.

Consent

- To use the platform you must have signed a declaration wherein you consent that your information may be used in any manner as contemplated in this privacy policy;
- It is vital that for the exchange of POWEC Tokens for electricity that participants and Powerchain know the identity of all the participants on the Powerchain, to ensure that POWEC Tokens and electricity are transferred to the parties transacting between each other in a manner that promotes the use of the platform, without risk of fraud or network security.
- you are entitled to withdraw your consent at any time, and, we shall only use your information as statutorily required of us due to any legal obligation arising from an local, state, national legislation or international treaty, and, upon request we shall further you with particulars concerning the precise nature of the legal obligation.

(DRAFT NOTE: IN ORDER TO CONDUCT BUSINESS IN THE EU THE FOLLOWING NEEDS TO BE INCLUDED IN OUR PRIVACY POLICY

Where do we store and process personal data?

If you transfer data outside the European Economic Area, outline the measures you will put in place to provide an appropriate level of data privacy protection. Eg contractual clauses, data transfer agreements, etc.

How do we secure personal data?

Describe your approach to data security and the technologies and procedures you use to protect personal information. For example, these may be measures:

- to protect data against accidental loss
- to prevent unauthorised access, use, destruction or disclosure
- to ensure business continuity and disaster recovery
- to restrict access to personal information
- to conduct privacy impact assessments in accordance with the law and your business policies
- to train staff and contractors on data security
- to manage third party risks, through use of contracts and security reviews

You should also outline how you securely dispose of data after you no longer need it.

Use of automated decision-making and profiling

Where you use profiling or other automated decision-making, you must disclose this in your privacy policy. In such cases, you must provide details on existence of any automated decision-making, together with information about the logic involved, and the likely significance and consequences of the processing of the individual.

10. Changes to Our Privacy Policy

We occasionally modify the Privacy Policy and any changes that we may make to it in the future will be posted on this page, and, where appropriate, notified to you by email

11. Force Majeure

Powerchain.Energy OU will not be held liable for any loss, damage or misuse of the personal information of the users due to Force Majeure. A “Force Majeure Event” for the purposes of this Privacy Policy shall mean any event that is beyond reasonable control of Powerchain.Energy OU and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, unauthorised access to computer

data and storage device, computer viruses breach of security and encryption or any other cause beyond the control of Powerchain.Energy OU.

12. Contact us

hi@powerchain.energy

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