
**P2P GLOBAL NETWORK
GDPR PRIVACY NOTICE**

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GDPR Privacy Notice

Last updated: November 13, 2018

NOTE: Capitalised terms not otherwise defined in this document bear the meaning specified in Schedule 1 to this GDPR Privacy Notice.

Introduction

- A. The GDPR enters into force on May 25, 2018.
- B. The General Data Protection Regulation (“GDPR”) is a new European privacy regulation, which will replace the current EU Data Protection Directive (“Directive 95/46/EC”). The GDPR aims to strengthen the security and protection of personal data of EU data subjects and harmonize EU data protection law.

Our Privacy Notice for You

1. Who Is Affected By GDPR?

The GDPR imposes new rules on companies, government agencies, non-profits, and other organizations that offer any goods and services to people in the European Union, or that collect and analyse data tied to European data subjects.

2. How Has Company Been Preparing for the GDPR?

At Company we are committed to maintaining an effective security and privacy program. We recently updated our privacy policy and terms of use to meet the standard of GDPR and to reflect further transparency around our uses of user data. We are dedicated to ensuring our students, partners and other users have the highest confidence in our data protection practices and see GDPR as an opportunity to strengthen this devotion.

3. What Key Changes Did Company Make?

Company evaluated all new requirements and restrictions imposed by the GDPR and below are the steps taken. We are taking any action necessary to ensure that we handle your personal data in compliance with applicable law. You will receive notifications of changes to our Terms of Use within the Company Platform. As further regulations are published by the EU lawmakers, we will continue to review our terms.

3.1. **Policies and Terms**

Our legal documentation (namely our Privacy Policy, our Cookie Policy, and our Terms of Use) will be updated to reflect any product changes. Anytime we make changes to our terms, we hope to make it easy for you and our entire community – to understand the changes and the choices and control you have over your data.

3.2. **Product Changes**

Our technology and security teams have worked hard to make changes to the Company service to meet the standards of GDPR. We are constantly working on adding new features that will improve your experience using our platform and will allow you to (i) better control whether you want to share specific content with third parties, (ii) ensure proper standards for consents and lawful processing, and (iii) ask for the deletion and portability of your data.

3.3. **Age Restrictions**

In accordance with GDPR, we have changed the age of consent for the use of our services by European data subjects.

3.4. **Our Service Providers**

GDPR requires us to ensure our data processors providing sufficient guarantees to implement appropriate technical and organizational privacy measures and we have endeavoured to implement such measures throughout our platform. We have likewise undertaken a project with all of our vendors to ensure compliance with those obligations where data is processed by them. Moving forward, we will continue to review all our vendors, finding out about their GDPR plans and arranging similar GDPR-ready data processing agreements with them.

3.5. **Our Enterprise Partners**

Company implements physical, personnel, IT and vendor security practices and policies that are consistent with industry practices and the level of data that is provided and hosted by Company.

Disclaimer

THIS PAGE IS PROVIDED AS A SOURCE OF GENERAL INFORMATION. IT IS NOT AND SHOULD NOT BE TREATED AS LEGAL ADVICE TO ANY INDIVIDUAL USER.

Schedule 1

Definitions and interpretations

1	Company / we.	P2P Global Network/Peer 2 Peer Global Network
2	Platform	www.p2pglobal.io
3	Company's contact email address	info.p2pglobal.io

**P2P GLOBAL NETWORK
PRIVACY POLICY**

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Privacy Policy

Last updated: November 13, 2018

PLEASE READ THIS PRIVACY POLICY AS WELL AS OUR TERMS AND CONDITIONS OF USE CAREFULLY, AS THEY GOVERN YOUR USE OF OUR SERVICES THROUGH OUR PLATFORM. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT USE OUR SERVICES.

NOTE: Capitalised terms not otherwise defined in this document bear the meaning specified in Schedule 1 to this Privacy Policy.

Our Privacy Policy Terms and Conditions

1. We Respect Your Privacy

- (a) At Platform, we are committed to protecting your privacy as a customer and an online visitor to our platform. We use the information we collect about you to maximize the services that we provide to you. We respect the privacy and confidentiality of the information provided by you and adhere to the GDPR Privacy Principles.
- (b) Company respects your right to privacy and is committed to safeguarding the privacy of our customers and Platform visitors. This Privacy Policy sets out how we collect and treat your Personal Data.
- (c) We adhere to the rules contained in the Privacy Act and to the extent applicable, the EU General Data Protection Regulation 2016/679 (*GDPR*).
- (d) Personal Data is information we hold which is identifiable as being about you. This includes information such as your name, email address, identification number, or any other type of information that can reasonably identify an individual, either directly or indirectly.
- (e) You may contact us in writing at Company's address and/or at our email address, for further information about this Privacy Policy.

2. What Personal Data Is Collected

- (a) In the course of your visits to our Platform or use of our products and services, we may obtain the following information about you: name, company name, email address, telephone/mobile number, credit card details, billing address, geographic location, IP

address, survey responses, support queries, blog comments and social media handles (*Personal Data*).

- (b) Company will, from time to time, receive and store Personal Data you submit to our Platform, provided to us directly or given to us in other forms.
- (c) You may provide basic information such as your name, phone number, address and email address to enable us to send you information, provide updates and process your product or service order.
- (d) We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.
- (e) Additionally, we may also collect any other information you provide while interacting with us.
- (f) Our services are not directed to persons under 18 and we do not knowingly collect Personal Data from anyone under 18. If we become aware that a child under 18 has provided us with Personal Data, we will delete that information as quickly as possible. If you are the parent or guardian of a child and you believe they have provided us with Personal Data without your consent, then please contact us.
- (g) You can review, correct, update or delete your Personal Data by either logging into your account and making the changes yourself or contacting us directly to do so.

3. How We Collect Your Personal Data

- (a) Company collects Personal Data from you in a variety of ways, including when you interact with us electronically or in person, when you access our Platform and when we engage in business activities with you. We may receive Personal Data from third parties. If we do, we will protect it as set out in this Privacy Policy.
- (b) By providing us with Personal Data, you consent to the supply of that information subject to the terms of this Privacy Policy.

4. How We Use Your Personal Data

- (a) We use the information we collect to deliver our services to you, including: communicating with you, providing technical support, notifying you of updates and offers, sharing useful content, measuring customer satisfaction, diagnosing problems and providing you with a personalized Platform experience.
- (b) Company may use Personal Data collected from you to provide you with information about our products or services. We may also make you aware of new and additional products, services and opportunities available to you. Marketing communications are

PRIVACY POLICY

only sent to you if you have requested or subscribed to them. You can opt out of our marketing communications at any time by unsubscribing or emailing us at our contact email address and your request will be actioned immediately.

- (c) Company will use Personal Data only for the purposes that you consent to or if we have other legal grounds to use such data. This may include to:
 - i. provide you with products and services during the usual course of our business activities;
 - ii. administer our business activities;
 - iii. manage, research and develop our products and services;
 - iv. provide you with information about our products and services;
 - v. communicate with you by a variety of measures including, but not limited to, by telephone, email, sms or mail; and
 - vi. investigate any complaints.
- (d) If you withhold your Personal Data, it may not be possible for us to provide you with our products and services or for you to fully access our Platform.
- (e) We may disclose your Personal Data to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, legal proceedings or in response to a law enforcement agency request.
- (f) If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any Personal Data and non-Personal Data contained in those databases.
- (g) We also use the information we collect in aggregated and anonymized forms to improve our services, including: administering our Platform, producing reports and analytics, advertising our products and services, identifying user demands and assisting in meeting customer needs generally.
- (h) Any information you choose to make publicly available, such as blog comments and testimonials on our Platform, will be available for others to see. If you subsequently remove this information, copies may remain viewable in cached and archived pages on other websites/apps/platforms or if others have copied or saved the information.
- (i) We retain personal information for as long as we reasonably require it for legal or business purposes. In determining data retention periods, we take into consideration local laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need personal information, we securely delete or destroy it.

5. Disclosure of Your Personal Data

- (a) We may from time to time need to disclose certain information, which may include your Personal Data, to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request. Also, we may use your Personal Data to protect the rights, property or safety of our Platform, our customers or third parties.
- (b) Company may disclose your Personal Data to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy.
- (c) If we do disclose your Personal Data to a third party, we will protect it in accordance with this Privacy Policy. If there is a change of control in one of our businesses (whether by merger, sale, transfer of assets or otherwise) customer information, which may include your Personal Data, could be transferred to a purchaser under a confidentiality agreement. We would only disclose your Personal Data in good faith and where required by any of the above circumstances.

General Data Protection Regulation (GDPR)

6. Users from the European Union

- (a) Company will comply with the principles of data protection set out in the GDPR for the purpose of fairness, transparency and lawful data collection and use.
- (b) We process your Personal Data as a data processor and/or to the extent that we are a data controller as defined in the GDPR.
- (c) We must establish a lawful basis for processing your Personal Data. The legal basis for which we collect your Personal Data depends on the data that we collect and how we use it.
- (d) We will only collect your Personal Data with your express consent for a specific purpose and any data collected will be to the extent necessary and not excessive for its purpose. We will keep your data safe and secure.
- (e) We will also process your Personal Data if it is necessary for our legitimate interests, or to fulfil a contractual or legal obligation.
- (f) We process your Personal Data if it is necessary to protect your life or in a medical situation, it is necessary to carry out a public function, a task of public interest or if the function has a clear basis in law.
- (g) We do not collect or process any Personal Data from you that is considered as 'sensitive personal data' under the GDPR, such as Personal Data relating to your sexual orientation or ethnic origin unless we have obtained your explicit consent, or if it is being collected subject to and in accordance with the GDPR.

- (h) You must not provide us with your Personal Data if you are under the age of 16 without the consent of your parent or someone who has parental authority for you. We do not knowingly collect or process the Personal Data of children.

7. Your Rights under the GDPR

- (a) If you are an individual residing in the EU, you have certain rights as to how your Personal Data is obtained and used. Company complies with your rights under the GDPR as to how your Personal Data is used and controlled if you are an individual residing in the EU
- (b) Except as otherwise provided in the GDPR, you have the following rights:
 - i. to be informed how your Personal Data is being used;
 - ii. access your Personal Data (we will provide you with a free copy of it);
 - iii. to correct your Personal Data if it is inaccurate or incomplete;
 - iv. to delete your Personal Data (also known as "the right to be forgotten");
 - v. to restrict processing of your Personal Data;
 - vi. to retain and reuse your Personal Data for your own purposes;
 - vii. to object to your Personal Data being used; and
 - viii. to object against automated decision making and profiling.
- (c) Please contact us at any time to exercise your rights under the GDPR at the contact details in this Privacy Policy.
- (d) We may ask you to verify your identity before acting on any of your requests.

8. Hosting and International Data Transfers

- (a) Information that we collect may from time to time be stored, processed in or transferred between parties or sites located in countries outside of the EEA. These may include, but are not limited to Countries.
- (b) We and our other group companies have offices and/or facilities in Countries. Transfers to each of these countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission website; the use of binding corporate rules, a copy of which you can obtain from Company's data protection officer if appointed.
- (c) The hosting facilities for our Platform are situated in Countries. Transfers to each of these Countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website;

the use of binding corporate rules, a copy of which you can obtain from Company's Data Protection Officer.

- (d) Our Suppliers and Contractors are situated in Countries. Transfers to each of these Countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from Company's Data Protection Officer.
- (e) You acknowledge that personal data that you submit for publication through our Platform or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

9. Security of Your Personal Data

- (a) We will use all reasonable means to protect the confidentiality of your Personal Data while in our possession or control. All information we receive from you is stored and protected on our secure servers from unauthorized use or access. Credit card information is encrypted before transmission and is not stored by us on our servers.
- (b) To enable us to deliver our services, we may transfer information that we collect about you, including Personal Data, across borders for storage and processing in countries other than the EU. If your Personal Data is transferred and processed outside the EU, it will only be transferred to countries that have adequate privacy protections.
- (c) We retain your personal information for as long as needed to provide services to you and as otherwise necessary to comply with our legal obligations, resolve disputes and enforce our agreements.
- (d) In the event there is a breach of our security and your Personal Data is compromised, we will promptly notify you in compliance with the applicable law.
- (e) Company is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.
- (f) Where we employ data processors to process Personal Data on our behalf, we only do so on the basis that such data processors comply with the requirements under the GDPR and that have adequate technical measures in place to protect Personal Data against unauthorised use, loss and theft.
- (g) The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us, or receive

from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that Personal Data that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

10. Sharing Your Information with Third Parties

- (a) We do not and will not sell or deal in Personal Data or any customer information.
- (b) Your Personal Data details are only disclosed to third party suppliers when it is required by law, for goods or services which you have purchased, for payment processing or to protect our copyright, trademarks and other legal rights. To the extent that we do share your Personal Data with a service provider, we would only do so if that party has agreed to comply with our privacy standards as described in this Privacy Policy and in accordance with applicable law. Our contracts with third parties prohibit them from using any of your Personal Data for any purpose other than that for which it was shared.

11. Access to Your Personal Data

- (a) You may request details of Personal Data that we hold about you in accordance with the provisions of the Privacy Act, and to the extent applicable the EU GDPR. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at our Company's contact email address.
- (b) We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act or any other applicable law.

12. Complaints about Privacy

If you have any complaints about our privacy practices, please feel free to send in details of your complaints to our Company's contact email address. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

13. Changes in Privacy Policy

- (a) As we plan to ensure our Privacy Policy remains current, this policy is subject to change. We may modify this policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on this Platform. Please return periodically to review our Privacy Policy.

- (b) Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our Platform or notice board. Please check back from time to time to review our Privacy Policy.

14. Platform

14.1. When you visit our Platform

When you come to our Platform, we may collect certain information such as browser type, operating system, Platform visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

14.2. Cookies and pixels

We may from time to time use cookies on our Platform. Cookies are very small files which Platform uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our Platform. Our Platform may from time to time use cookies to analyse Platform traffic and help us provide a better Platform visitor experience. In addition, cookies may be used to serve relevant ads to Platform visitors through third party services such as Google AdWords. A cookie is a small file placed in your web browser that collects information about your web browsing behaviour. Use of cookies allows a website/app/platform to tailor its configuration to your needs and preferences. Cookies do not access information stored on your computer or any Personal Data (e.g. name, address, email address or telephone number). Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. This may, however, prevent you from taking full advantage of our Platform. Our Platform uses cookies to analyse Platform traffic, provide social media sharing and liking functionality and help us provide a better Platform visitor experience. In addition, cookies and pixels may be used to serve relevant ads to Platform visitors through third party services such as Google Adwords and Facebook Adverts. These ads may appear on this Platform or other websites/apps/platforms you visit. See more about our use of cookies in our Cookie Policy at Platform.

14.3. Third party sites.

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not

constitute sponsorship or endorsement or approval of these websites. Please be aware that Company is not responsible for the privacy practises of other such websites. We encourage our users to be aware, when they leave our Platform, to read the privacy statements of each and every website that collects personal identifiable information.

This Platform may contain links to other websites. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that we are not responsible for the privacy practices of such other websites. We encourage our users to be aware, when they leave our Platform, to read the privacy statements of each and every website that collects personally identifiable information. This Privacy Policy applies solely to information collected by this Platform.

14.4. **Connecting via social networks.**

Some of our services may include social networking features, such as the Facebook® “Like” button and widgets, “Share” buttons, and interactive mini-programs. Additionally, you may choose to use your own social networking logins from, for example, Facebook or LinkedIn®, to log into some of our services. If you choose to connect using a social networking or similar service, we may receive and store authentication information from that service to enable you to log in and other information that you may choose to share when you connect with these services. These services may collect information such as the web pages you visited and IP addresses, and may set cookies to enable features to function properly. We are not responsible for the security or privacy of any information collected by these third parties. You should review the privacy statements or policies applicable to the third-party services you connect to, use, or access. If you do not want your personal information shared with your social media account provider or other users of the social media service, please do not connect your social media account with your account for the services and do not participate in social sharing on the services.

Contact Us

If you have any questions or concerns at any time about our Privacy Policy or the use of your Personal Data, please contact us at our Company’s contact email address in Schedule 1 and we will usually respond within 48 hours.

If we have appointed a Data Protection Officer you can find his/her contact details in Schedule 1

Schedule 1

Definitions and interpretations

1	Company / we.	P2P Global Network/Peer 2 Peer Global Network
2	Platform	www.p2pglobal.io
3	Countries	All
4	Company's contact email address	inof@p2pglobal.io
5	Data Protection Officer contact email address	info@p2pglobal.io