

Privacy Policy

LAST UPDATED: July 05, 2018

Paperstreet LLC, together with its affiliates ("Paperstreet", "we", "us") values the privacy of individuals who visit our investment platform, available at <https://paperstreet.vc> and any of our other websites, applications, or services that link to this Privacy Policy (collectively, the "Service"). The Service allows accredited investors that have created an account with us ("Investors") to make investments in token sales with blockchain companies listed on the Service ("Token Developers"). This Privacy Policy ("Policy") is designed to explain how we collect, use, and share information from users of the Service, including Investors and Token Developers. This Policy is incorporated by reference into our Terms of Service. By agreeing to this Policy in your account setup or by using the Service, you agree to the terms and conditions of this Policy.

Information We Collect

Information You Provide to Us

We collect any information you provide to us when you use the Service. You may provide us with information in various ways on the Service.

Registration: If you register with us as an Investor, you are required to provide us with your name and email address and to designate a password. In order to participate in token sales as an Investor, we also require certain information to confirm your status as an accredited investor. For example, Investors hoping to participate in a token sale in an individual capacity, and not on behalf of a corporation or trust, must provide their full name, social security number, phone number, address, date of birth, and proof of required assets (such as an asset appraisal) or income (such as tax filings or pay stubs). More information regarding investor accreditation is available [here](#). We also require Investors to complete a short questionnaire regarding their interest in specific types of token sales.

Token Developers will provide us with information about their project and token offering during the course of our diligence process, certain of which will be provided to potential Investors to assist in making an investment decision.

Financial Information: Investors may invest in token sales using traditional currency and/or cryptocurrency. To facilitate these transactions we will collect necessary financial information, such as your bank's routing number and your account number.

Communications: If you contact us directly, we may receive additional information about you. For example, when you email our Customer Support Team, we will receive your email address, the contents of a message or attachments that you may send to us, and other information you choose to provide.

Information We Collect Automatically From Your Use of the Service

When you use our Service, we may collect information from you through automated means, such as cookies, web beacons, and web server logs. By using the Service, you consent to the placement of cookies, beacons, and similar technologies in your browser and on emails in accordance with this Policy. The information collected in this manner includes IP address, browser characteristics, device IDs and characteristics, operating system version, language preferences, referring URLs, and information about the usage of our Service. For more information on the cookies we use, please see the section “How We Use of Cookies and Other Tracking Mechanisms” below.

We may use this information, for example, to ensure that the Service functions properly, to determine how many users have visited certain pages or opened messages, or to prevent fraud. We also work with analytics providers which use cookies and similar technologies to collect and analyze information about use of the Service and report on activities and trends. If you do not want information collected through the use of cookies, there is a procedure in most browsers that allows you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Service. [Note to Paperstreet: does it prevent a user from actually using the Service?]

Please note that we do not respond to “do not track” signals. [Note to Paperstreet: do we allow third party advertisers or advertising networks to place cookies on the site?]

How We Use Your Information

We may use the information we collect:

- To verify the identity and accreditation status of investors, which may include conducting a soft pull on your credit history, and to facilitate investments in listed tokens.
- To operate, maintain, enhance and provide features of the Service, to provide services and information that you request, to respond to comments and questions, and otherwise to provide support to users.
- To understand and analyze the usage trends and preferences of our users, to improve the Service, and to develop new products, services, features, and functionality.
- To contact you for administrative or informational purposes, including by providing customer service or sending communications, including changes to our terms, conditions, and policies.
- For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest.
- To personalize your experience on the Service by presenting tailored content.
- We may aggregate data collected through the Service and may use and disclose it (without disclosing your personal information) for any purpose.
- For our business purposes, such as audits, security, compliance with applicable laws and regulations, fraud monitoring and prevention.
- To enforce our Terms of Service or other legal rights.

How We Use Cookies and Other Tracking Mechanisms

We use cookies and other tracking mechanisms to track information about your use of our Service. We may combine this information with other personal information we collect from you.

Cookies. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Service, while others are used to enable a faster log-in process or to allow us to track your activities at our Service. There are two types of cookies: session and persistent cookies.

- **Session Cookies.** Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged into the Service. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our Service.
- **Persistent Cookies.** Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical information about user activity.

Disabling Cookies. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our website who disable cookies will not be able to browse certain areas of the website or use certain parts of the Service.

How We Share Your Information

We may disclose information that we collect through the Service to third parties in the following circumstances:

- To credit bureaus and other third parties who provide Know Your Customer and Anti-Money Laundering services, including verifying users as accredited investors.
- Information collected from and about Investors may be shared with Token Developers to facilitate Investor directed investments.
- To our third party service providers who provide services such as website hosting, data analysis, customer service, email delivery, auditing, and other services.
- To a potential or actual acquirer, successor, or assignee as part of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in bankruptcy or similar proceedings).
- If required to do so by law or in the good faith belief that such action is appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

In addition, we may use third party analytics vendors to evaluate and provide us with information about your use of the Service. We do not share your information with these third parties, but these analytics service providers may set and access their own cookies, pixel tags and similar technologies on the Service and they may otherwise collect or have access to information about you which they may collect over time and across different websites. For example, we use Google Analytics to collect and process certain analytics data. Google provides some additional privacy options described at <https://www.google.com/policies/privacy/partners>.

We may use and disclose aggregate information that does not identify or otherwise relate to an individual for any purpose, unless we are prohibited from doing so under applicable law.

Third Party Services

We may display third-party content on the Service. Third-party content may use cookies, web beacons, or other mechanisms for obtaining data in connection with your viewing of and/or interacting with the third-party content on the Service. This Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Service link. The inclusion of a link on the Service does not imply endorsement of the linked site or service by us or by our affiliates.

Security

We use certain physical, organizational, and technical safeguards that are designed to maintain the integrity and security of information that we collect. Please be aware that no security measures are perfect or impenetrable and thus we cannot and do not guarantee the security of your data. It is important that you maintain the security and control of your account credentials, and not share your password with anyone. In addition, we offer our users two-factor authentication which is designed to protect their account.

Your Choices

You may, of course, decline to share certain information with us, in which case we may not be able to provide to you some of the features and functionality of the Service. From time to time, we send marketing e-mail messages to our users. If you no longer want to receive such emails from us on a going forward basis, you may opt-out via the "unsubscribe" link provided in each such email.

Use of Service by Minors

The Service are not directed to individuals under the age of eighteen (18), and we request that they not provide personal information through the Service.

International Cross-border Data Transfer

Paperstreet uses servers hosted in the United States. Please note that we may be transferring your information outside of your region for storage and processing in the United States and around the globe. By using the Service you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

Updates to this Privacy Policy

We may make changes to this Policy. The "Last Updated" date at the top of this page indicates when this Policy was last revised. If we make material changes, we may notify you through the Service or by sending you an email or other communication. We encourage you to read this Policy periodically to stay up-to-date about our privacy practices. Your use of the Service following these changes means that you accept the revised Policy.

U.S. Consumer Privacy Notice

Financial companies choose how they share your personal information. Under federal law, that means personally identifiable information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read the U.S. Consumer Privacy Notice, available [here](#), carefully to understand what we do.

Contact us

If you have any questions about this Policy, please contact us at contact@paperstreet.vc.

Additional European Union Disclosures

These disclosures apply to users who reside in the European Union (“EU Data Subjects”).

Data Controller

Paperstreet, LLC, [insert address] is the data controller of your personal information collected pursuant to this Policy.

Legal Basis for Processing Your Information

The legal bases for the processing of your personal information include your consent (such as to send you marketing messages), and necessity for performance of a contract to provide the Services, and our legitimate interest (such as for marketing, analytic purposes and to improve the Site and our Services), pursued by us or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of our recruitment candidates. Any consent you provide may be withdrawn at any time by contacting us at contact@paperstreet.vc, provided such withdrawal shall not affect any processing that occurred prior to such withdrawal.

Retention of Your Information

As a general rule, we will store your personal information as long as necessary for the purposes for which it was collected, provided that we may retain information longer for legal, accounting and regulatory or for our legitimate business purposes. [Note to Paperstreet: Indicate whether information is deleted if an account is closed]. If we are required by law to retain your information longer or where your information is required for us to assert or defend against legal claims, we will retain your information until the end of the relevant retention period or until the claims in question have been settled. Please note that if you request deletion of your data, we may not be able to provide or complete the Services offered on our Site.

Data Protection Authority

If you believe that we are not processing your personal information in compliance with this Policy or applicable data protection laws, you have the right to lodge a complaint with the local data protection authority in your jurisdiction. [Note to Paperstreet: I assume we don't have one].

Your Obligations to Provide Information

Your provision of your personal information under this Policy primarily results from contractual requirements in order to make the Service available to you. In certain circumstances, statutory requirements may require us to collect personal information from you. Failure to provide

personal information may result in your inability to access our Services.

Email Marketing

If you do not wish to receive email marketing communications from us, you can click the unsubscribe link in the relevant email. This will allow you to remove yourself from that particular email mailing list. You can do this for each of our email marketing communications. You can opt-out of all communications except for certain service related messages, such as order confirmations or important account-related messages.

Requests Regarding Your Information

EU Data Subjects may contact us at any time using the contact details provided in the “Contact Us” section above:

- If you want to rectify your inaccurate personal data.
- If you want us to erase your personal data from our records, in the event grounds for erasure applies according to applicable privacy law.
- If you want to restrict our processing of personal data, in the event grounds for such restriction applies according to applicable privacy law.
- If you want to receive the personal data concerning you which you have provided to us, in a commonly used and machine-readable format (Data Portability), according to applicable privacy law.

For your protection, we will ask you for proof of your identity before making your personal data available to you. We may have to keep certain information required by law and/or for our own legitimate business purposes.