

Laurel Foundry Privacy Policy

Last Updated: 05/04/2018

Introduction

Welcome to the Laurel Foundry Limited's privacy policy (the "**Policy**").

The Laurel Foundry Limited (C 85340) of 171, Old Bakery Street, Valletta VLT 1455, Malta ("**we**", "**us**", "**our**" or "**Laurel Foundry**"), and its affiliates and subsidiaries, respect your privacy and are committed to protecting your personal data. The Laurel Foundry has launched a project, accessible via <https://gamertoken.io/documents/whitepaper-gamertoken.pdf>, which will involve the issuance of virtual tokens, named GamerTokens (the "**Tokens**"), on the market for subscription and purchase by customer and alike from all over the world. In that regard, through its website <https://gamertoken.io> (the "**Site**"), and the issuance platform, Laurel Foundry ensures that all transactions for its Tokens are accurately processed, and carried out in a reliable and secure manner. In that vein, Laurel Foundry provides you, the customer, with a personalised, secure transactional service regarding its Tokens (the "**Services**").

The purpose of this Policy is to set out the basis on which your personal data is processed by us, to inform you about how we will handle and look after your personal data, including in relation to when you visit our website (regardless of where you visit it from), and to tell you about (i) our obligations in regard to processing your personal data responsibly, (ii) your data protection rights as a data subject and (iii) how the law protects you. It should be read in conjunction with our Cookie Policy, which can be accessed via the following link: <https://gamertoken.io/documents/cookiepolicy.pdf>.

We process your data in an appropriate and lawful manner, in accordance with the Data Protection Act (Chapter 440 of the Laws of Malta) (the "**Act**") and the General Data Protection Regulation (Regulation (EU) 2016/679) (the "**GDPR**"), following its application on 25th May 2018.

This Policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version at <https://gamertoken.io/documents/privacypolicy.pdf>. Please also use the Glossary to understand the meaning of some of the terms used in this Policy.

1. Important Information and Who We Are;

2. The Data We Collect About You;

3. How is Your Personal Data Collected;

4. How We Use Your Personal Data;

5. Disclosures of Your Personal Data;

6. No International Transfers;

7. Data Security;

8. Data Retention;

9. Your Legal Rights;

10. Glossary;

11. Google Analytics.

1. Important Information and Who We Are

Purpose of this Policy

This Policy aims to give you information on how the Laurel Foundry, as defined above, collects and processes your personal data (i) when you avail yourself of the Services and subscribe to, or purchase, one or more of its Tokens and furthermore, (ii) through your use of the **Site** (as defined above), including any data you may provide via the Site when you subscribe to our newsletter, mailing list and other marketing content.

Pertinently, neither the Services, nor the Site, are intended for children, and we do not knowingly collect data relating to children.

It is important that you read this Policy, together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Policy supplements the other policies and is not intended to override them. Moreover, certain processing activities require your express consent to be carried out, as indicated below in this Policy. You are kindly requested to provide your consent, particularly if you wish to benefit from the ancillary services that we offer and provide.

Controller

The Laurel Foundry Limited, as previously defined, is the controller and responsible for your personal data.

We have appointed a data protection officer (“**DPO**”) who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights as a data subject, please contact the DPO using the details set out below.

You can address any comments, queries or complaints to the DPO, using the details indicated below, with the words ‘**Data Protection Matter**’ in the subject line.

Contact details

Our full details are:

Full name of legal entity: The Laurel Foundry Limited (C 85340)

Name of DPO: Mr. Marcus Szablowsky

Email address: dataprotection@gamertoken.com

Postal address: 171, Old Bakery Street, Valletta VLT 1455, Malta

Contact details: dataprotection@gamertoken.com

You have the right to lodge a complaint at any time to the competent supervisory authority in your jurisdiction on data protection matters. In the case of Malta, this is the Information and Data Protection Commissioner (“**IDPC**”) (<https://idpc.org.mt/en/Pages/Home.aspx>). We would, however, appreciate the opportunity to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

Changes to the Policy and Your Duty to Inform Us of Changes

The data protection laws across the EU, including Malta, will change on 25th May, 2018, due the application of the GDPR. Although this Policy sets out most of your rights under the GDPR, we may not yet be able to respond to some of your requests until May, 2018 (for example, a request for the request for the transfer of your personal data), as we are still working towards getting our systems ready for some of these changes.

It is imperative that the personal data we hold about you is accurate and current at all times. Otherwise, this will impair the quality of the Services (amongst other potential issues). Please keep us informed if your personal data changes during your relationship with us.

Third-Party Links

The Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policy. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and disclose different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, nationality, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone or mobile numbers.
- **Compliance Data** includes copy of your identity card or passport.
- **Financial Data** includes your Ethereum wallet address, private key and credit card information.
- **Transaction Data** includes details about payments to and from you with regards to our issued Tokens, whether for fiat or virtual currency, and transaction reports.
- **Technical Data** includes internet protocol (IP) address, your login data (account registration), browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Site.
- **Profile Data** includes your username and password, purchases made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use the Site and Services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our business partners and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregate may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

As indicated, we do collect **Special Categories of Personal Data** about you, specifically via the information that we collect in terms of Compliance Data (as described above). The collection and processing of this information is necessary in order for us to be able to conduct our internal Anti-Money Laundering (AML) and Know-Your-Customer (KYC) checks and due diligence.

If You Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract with you, or as part of our defined legitimate interests to ensure security and protect against fraud and suspicious transactions, and you fail to provide that data when requested, we may not be able to perform, or otherwise fully perform, the contract which we have or which we are otherwise trying to enter into with you (namely regarding the subscription to, or purchase, of the Tokens and/or use of the Services). In such a case, we may have to cancel, or otherwise refuse to process, the attempted subscription or purchase of our Token/s, and withdraw the availability of the Services to you. In other instances, such as where you fail or refuse to fulfil our Compliance Data requirements, we will only be able to provide a reduced and restricted service to you.

3. How is Your Personal Data Collected?

We use different methods to collect data from and about you, including through:

- (i) **Direct Interactions:** You may give us your Identity, Contact, Compliance and Financial Data by filling in forms or by corresponding with us by post, phone, e-mail or otherwise.

This includes personal data you provide when you:

- create and register an account with us, via the Site, which is a precondition in order to be able to subscribe to, and purchase, the Tokens;
- apply, or attempt to apply, for our Tokens;
- submit the Compliance Data which we request;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

- (ii) **Automated technologies or interactions.** As you interact with the Site, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies.

Please see our cookie policy <https://gamertoken.io/documents/cookiepolicy.pdf> for further details about this.

- (iii) **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - a) analytics providers such as Google;
 - b) advertising networks Facebook, Twitter, Instagram and youtube; and
 - c) search information providers Google.
- Contact, Financial and Transaction Data from technical and platform providers and providers of payment services, such as Paypal and Ayden.
- Identity and Contact Data from publicly available sources, such as company registers.

4. How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you, namely when you wish to subscribe to or purchase the Tokens and/or utilise the Services.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, other than in relation to sending marketing communications to you, whether via email, text message or otherwise. You have the right to withdraw consent to marketing at any time by contacting us, as indicated below.

Purposes for Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

We have also identified what our legitimate interests are where appropriate.

Kindly note that we may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Accordingly, please contact us at dataprotection@gamertoken.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new user and to create your wallet	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
(a) To provide the Services; and (b) To process and execute your Token subscription and purchases, including: - Manage payments, fees, charges and subscription costs; and - Collect and recover money (be it fiat or virtual) owed to us. (c) To prevent and report fraudulent transactions.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications.	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (reporting of fraudulent transactions) (c) Necessary for our legitimate interests (to recover debts due to us and prevent fraudulent transactions).
To fulfil our internal compliance requirements and policies, including for the purpose of establishing and serving as proof of your identification.	(a) Compliance	(a) Necessary for our legitimate interests (in particular, to prevent fraudulent and suspicious transactions).
To manage our relationship with you,	(a) Identity	(a) Performance of a contract with you.

<p>which will include:</p> <p>(a) Notifying you about changes to our terms or this Policy</p> <p>(b) To resolve any issues which you have reported regarding the Services.</p> <p>(c) Asking you to provide feedback and/or take part in a survey.</p>	<p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications.</p>	<p>(b) Necessary to comply with a legal obligation.</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study trends with regards to our Tokens and Services, and to develop our project further).</p>
<p>To administer and protect this project and our business, as well as the Site (including troubleshooting, data analysis, testing, system maintenance, support, safety and security testing, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and prevention of hacks and other attacks, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation.</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p> <p>To ensure that Site content is presented in the most effective manner for you and your computer, and in a user friendly manner.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study trends regarding subscription and purchase of the Tokens, to develop our project and grow our business and to inform our marketing strategy).</p>
<p>To use data analytics to improve our Site, marketing, client and investor relationships and experiences.</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of clients and investors that subscribe to or purchase the Tokens, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</p>

Marketing and Promotional Offers

We strive to provide you with choices regarding certain personal data uses, particularly around marketing, advertising and promotional campaigns and communications.

Through your Identity, Contact, Technical, Usage and Profile Data, we would be able form a view on what we think you may want or need and what may be of interest to you. This would then enable us to determine which products, services and offers may be relevant for you (we call this **marketing**).

You are kindly requested to provide your **express opt-in consent** if you wish to:

- receive marketing communications, including subscription to our newsletter, regarding our products and services only as well as information about our events.
- receive marketing communications regarding our products, services and events, as well as those pertaining to our business partners, including subscription to both our and our partners' newsletters.

This will be processed as your Marketing and Communications Data and, depending on whether and to what you consent, your Marketing and Communications Data will either be inserted in our appropriate mailing list or not at all (where you do not provide the requested consent).

In either case, these marketing communications will only be sent to you by Laurel Foundry (subject to the provision of your prior, express opt-in consent).

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company for marketing purposes.

Opting Out

You can ask us or third parties to stop sending you marketing communications at any time by contacting us at optout-marketing@gamertoken.com using the words '**Marketing Communications**' in the subject line.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at dataprotection@gamertoken.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of Your Personal Data

We may have to share your personal data with the parties set out below, strictly for the purposes set out in the table in paragraph 4 above. These include:

- Internal Third Parties as specified in the Glossary;

- External Third Parties as specified in the Glossary;
- Banking Partners;
- I.D. Verification Partners;
- Those partners required to enable the provision of the Services, such as in particular the publisher of a game you access via the GamerToken ecosystem; and
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Furthermore, these third parties and process your data on the basis of strict confidentiality and subject to the appropriate security measures and safeguards.

We may also disclose your data if we are under a duty to disclose or share your personal data to comply with any legal obligation, judgment or under an order from a court, tribunal or authority.

We may also disclose your data to enforce our contractual terms with you, or to protect our rights, property or safety, that of our partners or other users of the Site and Services. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

6. No International Transfers

We do not transfer your personal data outside the European Economic Area (EEA).

7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, partners, service providers and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a strict and rigid duty of confidentiality.

Furthermore, we have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so, and within the timeframe prescribed at law.

8. Data Retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By and large, retention of most data shall not exceed the period of six (6) years from the date of termination or completion of the Services. This period of retention enables us to use the data for the defence of possible future legal claims (taking into account the applicable prescriptive period at law, plus a slight grace period past the expiry of prescription). In certain cases, we may retain your data for a period which will not exceed ten (10) years from the date of termination or completion of the Services and this will be retained in order for us to comply with applicable accounting and tax laws (this will primarily consist of your Transaction Data).

Data Minimisation

Whenever and to the extent possible, we anonymise the data which we hold about you when it is no longer necessary to identify you from the data which we hold about you.

In some circumstances, we may even anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us at dataprotection@gamertoken.com

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our project **GamerToken**, and in conducting and managing this project to ensure that that the Services as well as your Token subscriptions and purchases are processed, executed and provided to you in the best and most secure manner possible. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at dataprotection@gamertoken.com

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

None

External Third Parties

- Service providers, acting as processors, based in Malta and other EU countries who provide IT and system administration services.
- Professional advisers, acting as processors or joint controllers, including lawyers, bankers, auditors and insurers based in Malta and other EU countries who provide consultancy, banking, legal, insurance and accounting services.
- Commissioner for Inland Revenue (CIR), Financial Intelligence Analysis Unit (FIAU), regulators and other authorities, acting as processors or joint controllers, based in Malta, who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

You may send an email to dataprotection@gamertoken.com requesting information as the personal data which we process. You shall receive one copy free of charge via email of the personal data which is undergoing processing. Any further copies of the information processed shall incur a charge of € 25.

Right to information when collecting and processing personal data about you from publicly accessible or third party sources. When this takes place, we will inform you, within a reasonable timeframe, about the third party or publicly accessible source from which we have collected your personal data.

Request correction or rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected and/or updated, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where:

- there is no good reason for us continuing to process it;
- you have successfully exercised your right to object to processing (see below);
- we may have processed your information unlawfully; or
- we are required to erase your personal data to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer (data portability) of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. Withdrawal of consent may, however, affect or impair the possibility of us providing you with the Services. We will advise you if this is the case at the time you withdraw your consent.

11. Google Analytics

So as to improve the quality and overall user experience of the Website, we are using Google Analytics Advertising Features, including Google Tag Manager.

Third party analytics services including Google Analytics are used to help understand use of the website and get statistical data about visitors in order to improve user experience, personalize advertising and measure the efficiency of our advertising campaigns.

If you would like to opt-out of Google Analytics for display advertising, you may do so by using the *Ads Preference Manager*. In addition, there is also a Google Analytics Opt-Out browser add-on that you can download at <https://tools.google.com/dlpage/gaoptout>.

Conclusion

Any changes that we may make in the future to this Policy will be visibly posted on the Site and, if appropriate, notified to you via email.

If you have any questions regarding our privacy policy, or if you would like to send us your comments, please contact us today or alternatively write to our Data Protection Officer using the details below.

Name: Mr. Marcus Szablowsky

Address: 171, Old Bakery Street, Valletta VLT 1455, Malta

Email: dataprotection@gamertoken.com

Please check back frequently to see any updates or changes to this Policy.