

# Electrominer Token Sale

## Privacy Policy

Last Updated: August 2, 2018

### 1. About this Privacy Policy

We are committed to keeping your information safe and secure. Please read this privacy policy (“**Privacy Policy**”) so that you understand your rights in relation to this information, including how your information will be collected, used and processed.

Electrominer is a trading name of **Lighthouse Project One LLC**, exempted company, incorporated in Delaware, US and based in California, US, with limited liability, of 21092 Bake Pkwy, STE 102, Lake Forest, CA, 92630 (hereinafter "**Lighthouse Project One LLC**", "**Company**" "**we**", or "**us**").

In providing you with our website (<https://electrominer.io>) (our "**Website**") including our related products and services made available by us and this Website (together the "**Services**") or when you otherwise interact with us, we naturally collect information about you.

Our Services include the Website and Mobile Application, and/or any services or products made available through them, that will issue its internal ERC-20 digital tokens called Electrominer Tokens (hereinafter – the "**ELM**"). ELM will be used as an in-service currency for all the smart contracts, integrated with an automated value distribution protocol, based on KPI, that are set by specific users of Electrominer Services, and within the Services (hereinafter – the "**Platform**").

This Privacy Policy sets out what we collect, how we use that information, who we might share it with, and the steps we take to make sure it stays private and secure.

References in this notice to your "**personal data**" describes information that can be associated with a specific person and can be used to identify that person (including information about your activities, such as information about your use of the Website, Platform and/or Services, when directly linked to personal data, including automatically collected). Anyone, who uses the Services or the Platform, shall comprise: (a) any person, who uses the Platform or its Services, without prior registration and authorization ("**You**"); (b) any person, who uses the Platform or its Services, with prior registration and authorization ("**User**"); and (c) any person, who uses the Platform or its Services to purchase ELM ("**Buyer**"), together "**you**".

**Please read the following information carefully to understand our practices regarding your personal data and usage information and how we will use it.**

By continuing to use our Website, creating an account and/or purchasing ELM, You acknowledge – and you agreed with that by putting-in the special checkbox on the pop-up window displayed when You browsing the Website – that you have read, understood and accepted the information described in this Privacy Policy. If You do not agree with this

Privacy Policy in general or any part of it, You should not access the Website, Services, Platform and/or purchase ELM.

## **2. Collection, Processing and Use of Your Information**

### **A. How we collect your personal data**

The personal data we collect or have about you may come from different sources. Some of it will be provided by you and others will be collected from your activity on our Website, Platform and use of our Services.

### **B. How we use your personal data**

Our primary purpose for collecting personal information is to provide You with a secure, smooth, efficient, and customized experience. We collect, control, process and use your personal information to operate our Services and deliver the Services you have requested. We may use your personal data to:

- i. Identify our Users;
- ii. Administer and provide the Services and customer support per your request;
- iii. Develop new products and services;
- iv. Personalize our Services for You;
- v. send you technical notices and support and administrative messages;
- vi. Process transactions and send notices about your transactions;
- vii. Communicate with you about products, services, the Platform itself, promotions, events and other news and information we think will be of interest to you;
- viii. monitor and analyze trends, usage and activities in connection with our Services;
- ix. Resolve disputes, collect fees, and troubleshoot problems;
- x. Prevent potentially prohibited or illegal activities, and enforce our Terms and Conditions;
- xi. Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of Electrominer and others;
- xii. Customize, measure, and improve the Services and the content and layout of our website and applications;
- xiii. Deliver targeted marketing, service update notices, and promotional offers based on your communication preferences;
- xiv. Compare information for accuracy and verify it with third parties;
- xv. Verify your status and/or confirm information You provided to us;
- xvi. Distribute and account ELM tokens;
- xvii. Provide third parties with statistical information about our users (but those third parties will not be able to identify any individual User from that information);
- xviii. Control and process information we collect from or about You for implementation of applicable legislation;
- xix. Link, compile or combine information we collect from or about You;

xx. Verify compliance with the Terms and Conditions governing the use of our Services (including monitoring private messages sent through our website private messaging service).

C. What personal data and information we collect and how we use it

We may collect and use the following information about you:

### **2.1. Information we collect when you access our Website**

When you visit the Website, even if you have not yet created an account with us, we collect the information sent to us by your computer, mobile phone, or other access device. This information includes:

- a. Your IP address.
- b. Device information including, but not limited to, identifier, name, and type of operating system.
- c. Mobile network information.
- d. Standard web information, such as your browser type and the pages you access on our Website.

We collect this information in order to administer our Website, personalize our Website for you, monitor and analyze trends, usage and activity in connection with our Website and services and provide third parties with aggregated and anonymized statistical information about our Users.

When you access the Website or use our Platform or Services, we may place small data files called cookies on your computer or other device. We use these technologies to recognize you as our User, customize our Website for and to monitor usage of our Website. See **Cookies** subsection below for more information.

### **2.2. Information we collect when you create an account, use the Platform and purchase ELM**

In addition to the information collected when you access our Website, we may collect your full name, telephone number, address, email address, crypto-wallet address, phone number, IP address, survey responses, your status as accredited or professional investor, and any other information you choose to provide when You:

- create an account on our Website;
- subscribe to our Platform, its updates or register to our Services;
- subscribe to any news, notifications or marketing communications;
- respond to a survey;
- fill out any form; and/or
- request customer support or communicate with us in any manner.

In certain cases (when additional verification by a bank or compliance authority is needed to comply with governmental rules, anti-money laundering (“**AML**”) or “know-your-customer” (“**KYC**”) policies, we may require you to provide additional information including: scanned or depicted documents from you, such as photo of your passport or other identity card to show proof of identity as well as documentation that evidences your proof of address or documents or online database information to confirm the status.

We also may collect information about a User’s computer or other access devices for fraud prevention, KYC or AML purposes and other information as may be required by terms of Electrominer Token Sale Agreement

([electrominer.io/docs/Electrominer\\_Token\\_Sale\\_Agreement\\_ENG.pdf](https://electrominer.io/docs/Electrominer_Token_Sale_Agreement_ENG.pdf)).

This additional information shall only be necessary if requested and may be required prior to activation of your account.

We are sometimes required to compare the personal data You provide with third party databases in order to verify its accuracy and confirm your identity to comply with relevant AML regulations and KYC regulations.

We may use your personal data and other information we collect to detect, investigate and prevent fraudulent transactions and other illegal activities, develop new products and services and to verify compliance with our Terms and Conditions.

We collect this information so:

- ☑ We can verify your identify;
- ☑ We can comply with law;
- ☑ We can send you technical notices and support and administrative messages;
- ☑ With your consent, we can communicate with you via email about products, services, promotions, events and other information we think will interest you; and
- ☑ We can facilitate and record the purchase of ELM.

Please note, that all such data and documentation is gathered for the purposes of conformity with law and international security practices and regulations.

We do not intentionally collect any sensitive personal information, such as information about your religion, race, ethnicity and/or political views.

### **2.3. Information we collect only when you use the Platform**

If you use the Platform, we or our third party service provider may collect your payment method and other payment information for use in connection with your payments for storage or payments processing.

### **2.4. Information collected from other sources**

To provide you with the best Services possible, we also use third party service providers, which we entrust storing data, its collection and analysis. We believe that all third party service providers are important to our effective operation. They have their own privacy policies and their own conditions, whether to collect your data or opt-out from it. Thus, we do recommend You get yourself acquainted with the terms of third party service provider, if You use other services on our Platform.

By default, we will not seek any of your personal information through any other software platforms, data web resources etc., even if this information is necessary for You or your usage of the Platform, but we or our third party service provider may do it for the conformance and verification purposes.

## **2.5. Location data**

When you use a location-enabled device to access our Website and services, we may collect geographical location data or use various means to determine the location, such as sensor data from your device that may, for instance, provide data on nearby cell towers and wi-fi access spots.

We do this so that we can verify your location to ensure compliance with applicable laws including AML and KYC rules. This may include the blocking from certain countries where the usage of our Website, Platform, Services and/or buying of ELMs are prohibited by that country.

## **3. Cookies and Information Collected Automatically**

### **Information We Collect Automatically**

Information about your hardware and software may be automatically collected by us. This information can include usage information that includes your interactions with Services, device information, such as unique device identifiers, operating system information, internet service provider, IP address, screen resolution, language, the date and time of each of your log-ins and requests. We can also collect other information due to this Agreement, but only for the needs of the Platform. This information is used for the operation of Services, to maintain quality of the service, and to provide general statistics regarding use of Services and can be received otherwise.

However, we will collect all incoming and outgoing data from the Platform and its connected sources. All of this data will be automatically processed to provide a high-quality output, like all kinds of researches. This grants you, as well as other Platform users, the right to conduct a specifically targeted survey covering all the necessary questions and get a direct response. Taking this in consideration, You agree your information may be collected in such a manner as well.

### **Cookies**

We use cookies and other similar technologies (e.g., web beacons, flash cookies, etc.) (“**cookies**”) to enhance your experience using the Website and Platform. Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie consists of a text file

sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

We use the following cookies:

**Analytical/performance Cookies.** We use cookies to collect information about your browsing activities over time and across different websites following your use of our Services. They allow us to recognize and count the number of Users and to see how Users move around the Website when they are using it. This helps us to improve the way the Website, Services and/or Platform works. We use Google Analytics which is a web analytics tool that helps us understand how Users engage with the Website. Like many services, Google Analytics uses first-party cookies to track User interactions as in our case, where they are used to collect information about how Users use our site and how they use it. This information is used to compile reports and to help us improve our Website. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit [this Google page](#).

☑ We also use cookies on our Platform to allow (a) You to navigate from page to page without having to re-login each time and to count visits, and (b) us to see which areas and features of our Website are popular.

☑ **Third Party Cookies.** We may allow others to provide analytics services on our behalf in connection with our Services. These persons may use cookies and other technologies to collect information about your use of the Platform and Services and other websites and apps (if any), including your IP address, web browser, pages views, app performance, time spent on pages and links clicked. This information may be used by Electrominer and others to, among other things, analyze and track data, determine the popularity of certain content and better understand your online activity.

#### **4. How we might share your personal data**

A. We may share your personal data where:

☑ We need to in order to operate the Website, Platform, provide the Services and facilitate the purchase of ELMs.

☑ We have a public or legal duty to do so (e.g., to assist with detecting fraud, tax evasion, financial crime prevention, regulatory reporting, litigation or defending legal rights).

☑ We have asked for your permission to share your information for a specified purpose and You have agreed.

B. We may share your personal data:

- (i) with other Electrominer affiliated entities, in order to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services and communications;
- (ii) with service providers that perform work for us (such as hosting providers, identity verification, investor status verification, support, payment, tokens accounting and email service providers etc.);
- (iii) with law enforcement, government officials or other state bodies in response to a request for information, if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- (iv) with any third person if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of Electrominer or others;
- (v) with companies that we plan to merge with or substantially all or part of our assets are to be acquired by, or where we are financing all or a portion of our business by another company – for the reason of appropriate database transfer to the new owner or acquirer among other documents and databases transferred provided relevant agreements stipulate such transfer;
- (vi) between and among Company and its current and future parents, affiliates, subsidiaries and other companies under common control and ownership in case it is decided to change the legal entity operating the Platform / Website or providing Services or the Company lawfully assigns its rights and obligations related to the Platform, Website or Services – for the new owner to be able to operate the Platform and provide Services;
- (vii) when we believe, in our sole discretion, that the disclosure of personal information or cooperation with law enforcement agencies is necessary to report suspected illegal activity or to investigate violations of our Terms and Conditions, or to prevent crimes or intentions to use ELM for any criminal purpose, including money laundering.

C. Links to Third Party Websites

- Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised).
- If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

## **5. International Transfers of Data**

We store and process your information using cloud services in various jurisdictions, including the United States of America.

In the case of users located within the European Union, the information that we collect from you may be transferred to and stored in various jurisdictions outside of your country of residence and outside the European Economic Area ("EEA"). The laws on processing such information, including where such information is classed as "personal data", in these locations may be less stringent than in your country. It may also be processed by staff operating outside of your country or the EEA who works for us, for one of our service providers or one of our business partners. By submitting your information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this policy.

## **6. Your Rights**

You may access, review and edit your personal data at any time by logging in to your account using your credentials.

To disable your account and remove your personal information completely, please email us at [info@electrominer.io](mailto:info@electrominer.io) with a request. This request must comply at all times with Electrominer's Terms and Conditions.

### **Rights of Users located within the EU**

Users located within the European Union may have additional rights under applicable privacy laws. These rights include a right to ask us to provide details of the personal data we hold about them or in certain circumstances, you may request we delete your personal data. To exercise these rights, please contact us at [info@electrominer.io](mailto:info@electrominer.io).

If you want to see what information we hold about you or you want to correct any inaccuracies in that information, please contact us using the details below and we will provide you (if technically possible) with this free of charge.

You also have the right to ask us to:

- Have your information deleted, restrict the processing, or request we stop using it by contacting us.
- Have your information transferred or otherwise exported to you or another company by contacting us.
- Complain about how we process your information by contacting us in the first instance. You also have the right to lodge a complaint to your local data protection authority.

**If we have collected your information by obtaining your consent, you also have the right at any time to withdraw that consent by contacting us, provided however that, in case You remain to be the Platform User or Buyer, You will not be able to withdraw your consent for all the data in general, denying us to hold any your information at all. In other words, in case You withdraw your consent to collect, use, store, compile your information, You will not be Platform or Website User of Buyer of ELM right from the moment of the consent withdrawal as we shall no longer have a possibility to interact with you through the Platform or Website with Platform's or Website's technical features and for their appropriate purposes.**

## **GDPR implementation**

We completely respect and follow, where applicable, the rules and provisions of the EU General Data Protection Regulation (GDPR). Within the scope of GDPR we are the data controller of your personal data as well as personal data of all the Users and Buyers of the Platform, so that we will implement appropriate technical and organizational measures in an effective way in order to meet the requirements of GDPR and protect the rights of all the Users and Buyers of the Platform as may be reasonably practicable. In this relation we retain our sole right and authority to choose, appoint and dismiss the data processors of personal data as well as personal data of all the Users and Buyers of the Platform as well as give access to such data processors to the personal data.

In some cases, for example in relation to your personal information we receive from third parties, we act as data processors of your personal data. In these cases we still follow provisions of this Privacy Policy.

If you are a resident of the European Economic Area, You, in addition to other provisions of this Privacy Policy, have the following data protection rights:

☑ If You wish to access, correct, update, or request deletion of your personal information, You can do so at any time by emailing **info@electrominer.io** – provided however that deletion of your personal information may and probably will cause inaccessibility of the Services and some Website features for You.

☑ In addition, you can object to the processing of your personal information, ask us to restrict the processing of your personal information, or request portability (which is the transfer or the personal data, You provided to us, to any third person You indicate in your request) of your personal information. Again, You can exercise these rights by emailing **info@electrominer.io**, and again this may and probably will cause inaccessibility of the Services and some Website features for You. Note, that after your portability request is fulfilled we bear no responsibility in relation to the your personal data transferred or the outcome of such transfer.

☑ You have the right to opt-out of newsletter, marketing communications or notifications we send You at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send You. To opt-out of other forms of marketing, please contact us by emailing **info@electrominer.io**. But note that in the latter case You may miss some important information that we may send and we do not bear any responsibility for that.

☑ In case You at any time wish to revoke / withdraw your consent for your personal data use You should contact us – as your personal data controller – to initiate the request, even if such data lives on servers belonging to a data processor. We, upon receiving this request, would then proceed to remove the revoked data from our servers and / or request appropriate data processors to remove the revoked data from their servers. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

☒ And of course, You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

**Please, email us at [info@electrominer.io](mailto:info@electrominer.io) for any questions or to exercise your rights.**

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

### **7. Retention of information**

In accordance with applicable laws and as needed to provide services to our Users, we may hold your personal information. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain your personal information so long as your account is active. Moreover, your information may be held beyond the above mentioned period till it is indispensable for us to have relevant information to respond to any issues that may arise later.

Please note that the Electrominer has prepared Whitepaper ([electrominer.io/docs/white\\_paper.pdf](https://electrominer.io/docs/white_paper.pdf)) to describe the technical matters related to the Platform itself, User Accounts (as those are defined in the Terms and Conditions of the Platform [electrominer.io/docs/terms\\_and\\_conditions.pdf](https://electrominer.io/docs/terms_and_conditions.pdf)) and ELM, included, but not limited to, any technological aspects and software matters.

### **8. Marketing**

We do not sell, rent or lease your personal data and/or customer lists to third parties without your explicit consent. We may combine your personal data with information we collect from other sources and use it to improve and personalize the Electrominer Services, content, and advertising.

### **9. Security – How we Keep Your Personal Data Safe**

We use relevant electronic and procedural safeguards to protect the privacy of the information you provide to the Company from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure.

All ELM operations on the Platform, including but not limited to those between user accounts, are written into a blockchain register with compulsory and automated hash entry into the chain of blocks.

Blockchain security is provided by data records of all ELM movements from one account to another, with the obligatory and automatic hash recording into the Blockchain. The flow-of-funds record is open to the public. However, the registry information is unchangeable and anonymous.

## **10. Children – Notice to parents**

Our Website is not designed or targeted toward Users who might be under the age of 18 years old or of 16 years old for those Users who are residents of the European Economic Area.

Parents or guardians: We need to help to guard your children's privacy. We encourage you to talk to your children about safe and responsible use of their and your personal information while using Internet. Please note, that in case a User indicates that his age is below the abovementioned years amount, we need active approval of one of such User's parents or guardians for any consent, including but not limited to consent for personal data use and processing, such User gives to us. To give us such an approval you will have to follow instructions, indicated on the Website while a User under the age of 18 (or 16 in case of residents of the European Economic Area) is registering on the Website. In case Website is used without registration process, it is presumed by Electrominer that such use is approved by appropriate User's parents or guardians, if applicable.

Our Website, web-resources and web-resources of our affiliates, licensees, agents etc. in the part they use under our license or assignment does not publish any data that is targeted to children. We advise you to refrain your children from using web-resources, mentioned in this paragraph and ask them not to use them.

## **11. Changes to this Policy**

We may amend this policy at any time by posting a revised version on our Websites. The revised version will be effective at the time we post it. In addition, if the revised version includes any substantial changes to the manner in which your personal information will be processed, we may provide you with prior notice by posting notification of the change on the "Privacy Policy" area of our Website or any Services made available through our Websites. We encourage you to periodically check this page for the latest information on our Privacy Policy.

## **12. Contact us**

The responsibility for your personal data is with Electrominer, who is your data controller. Electrominer is the trading name of **LIGHTHOUSE PROJECT ONE LLC** of 21092 Bake Pkwy, STE 102, Lake Forest, CA, 92630, US.

If you have questions concerning this Privacy Policy, or you notice any bugs, errors or violations please feel free to send us an email at [info@electrominer.io](mailto:info@electrominer.io).