

PRIVACY POLICY

Trecento Capital SA, a private limited company incorporated in Switzerland, whose registered office is c/o Ochsner & Associés, 1 Place de Longemalle, 1204 Geneva (“**Company**,” “**we**,” “**our**” or “**us**”), understands that privacy is important to its users. This privacy policy (“**Privacy Policy**”) provides our policies and procedures for collecting, using, storing and disclosing your Personal Data (as described below) that we collect on our website and through the services we provide (collectively, our “**Service**”) or that we may request in accordance with Section 10(y) of our Terms and Conditions. This Privacy Policy governs the data protection of your Personal Data (as defined here below), regardless of what type of device or application you use to access our Service. By using our Service, you agree to the terms of this Privacy Policy.

The Company shall collect, process, store and share your Personal Data (as defined below) in accordance with the Federal Act on Data Protection (“**FADP**”) and the General Data Protection Regulation (“**GDPR**”),

The terms in this Privacy Policy – in particular the terms beginning with a capital letter – have the same meaning as the terms defined in the Terms and Conditions.

If, at any time, you have questions or concerns about our privacy practices, please feel free contact us at contact@trecento-bc.com.

1. WHAT PERSONAL DATA DO WE COLLECT ?

We may collect personal data from a variety of sources which include personal data you give us directly, or that we collect automatically or from other sources.

1.1. PERSONAL DATA YOU PROVIDE

When you register for, or access the Company Platform, as well as when you upload or download files on the Platform, we may collect some personal data (“**Personal Data**”), such as your name, phone number, credit card or other billing Information, email address, home, business postal addresses and the source of funds used for the purposes of purchasing the TRECENTO Tokens.

Personal Data also includes the information and documents that you provide to the Company pursuant to our Terms and Conditions in order to maintain compliance with any federal, state, local, domestic or foreign law, regulation or policy, including any "Know Your Customer" requirements and policies or any judicial process. Such information or documents may include but are not limited to, passports, driver’s licenses, utility bills, photographs, government identification cards or sworn statements, or, if you are an entity, proof of legal existence such as a government-issued certificate of incorporation or notarized formation documents, and we, or our nominee, may keep a copy of such information and disclose such information and documents in order to comply with applicable laws, regulations, rules or agreements.

1.2. COOKIES

We use “cookies” to collect Information and improve our Services. A cookie is a small data file that we transfer to your device. We may use “session ID cookies” to enable certain features of the Services, to better understand how you interact with the Services and to monitor aggregate usage and web traffic routing on the Services. We may also use “persistent cookies” to save your registration ID and login password for future logins to the Services. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of the Services.

1.3. LOG DATA

When you use the Services, we automatically record Information from the device you use, its software, and your activity using the Services. This may include the device's Internet Protocol ("IP") address, browser type, the web page(s) visited before you came to our website, Information you search for on our website, locale preferences, identification numbers associated with your devices, your mobile carrier, date and time stamps associated with transactions, system configuration, metadata concerning your Files, and other interactions with the Services.

1.4. GOOGLE ANALYTICS

The Company Platform uses Google Analytics, which is a service provided by Google Inc. located in the United States of America. Google Analytics is a tool which analyses the use of the Website. This tool may use cookies to collect anonymous information and generate reports in usage statistics of the Website without the user being personally identifiable by Google. The information produced by these cookies (including the user's IP address) can be sent to, and stored on, Google's servers in the United States of America. Google observes the data protection requirements of the Swiss-US Privacy Shield Frameworks and is registered with the US Department of Commerce's Privacy Shield program. If the User does not wish Google Analytics to record the user's visit data, the user can install a browser add-on to disable Google Analytics.

1.5. SOCIAL NETWORK

The Company Platform uses social plugins for various social network websites (hereinafter referred to as "**Social network**"), such as facebook.com (operated by Facebook, Inc.), twitter.com (operated by Twitter, Inc.) and plus.google.com (operated by Google, Inc.) (hereinafter referred to as the "**Plugin(s)**"). When you visit a website that contains Plugins, your browser will directly connect to the servers of the respective Social network. The content of the Plugin is directly transmitted to your browser from each Social network and is integrated into the website. By integrating the Plugin, the Social network receives the information that you have visited the website.

If you are logged on a Social network, it can associate your visit to the account of the respective Social network. If you interact with the Plugin, the corresponding information from your browser is directly sent to the respective Social network and stored there.

Please refer to the privacy policies of the respective Social networks for more information on the purpose and scope of data collection and further processing and use of data by the respective Social network, as well as your rights and ways to protect your privacy.

2. FOR WHICH PURPOSE DOWE USE YOUR PERSONAL DATA

2.1. PERSONAL DATA

Personal Data or data collected from cookies and other logging data, as well as any other personal data, may be used to:

- (i) contact or identify you;
- (ii) grant you access to the Platform and our Service;
- (iii) allow you to purchase the TRECENTO Tokens and process the transactions related to the TRECENTO Token Sale pursuant to the Terms & Conditions;
- (iv) administer in general your use of the Service;
- (v) comply with any requirement imposed by applicable law or by an order of a court or competent governmental or regulatory authority;

- (vi) provide and improve our Services and customer service ;
- (vii) personalize and improve your experience;
- (viii) manage enquiries and complaints;
- (ix) opening, maintaining or operating a bank account in the Company's name;
- (x) produce summary information for statistical, regulatory and audit purposes and/or any other reasonable purposes in accordance with applicable law;
- (xi) provide or offer software updates and product announcements.

2.3. ANALYTICS

As explained above, we may also collect some data (ourselves or by using third party services) by using logging and cookies, such as IP addresses, which can sometimes be correlated with Personal Data. We use this data for the above purposes and to monitor and analyze the use of the Service, for the Service's technical administration, to increase our Service's functionality and user-friendliness, and to verify users have the authorization needed for the Service to process their requests.

3. INFORMATION SHARING AND DISCLOSURE

We will not share, give access to or disclose your Personal Data, or data collected from cookies and other logging data, to third parties unless as described below. Please note that they will under no circumstances be sold to third parties.

3.1. YOUR ACCESS

Your Personal Data will be displayed in your profile page and elsewhere on the Service according to the preferences you set in your profile. You can review and revise your profile Information at any time.

3.2 ACCESS BY THE COMPANY

The Company and any employee of the Company who needs to access your Personal Data to comply with the Company's contractual or legal obligations will have access to your Personal Data.

3.3. ACCESS BY SERVICE PROVIDERS, BUSINESS PARTNERS AND OTHERS

We may use certain trusted third party companies and individuals to help us provide, analyze, and improve the Services (including but not limited to data storage, maintenance services, database management, web analytics, payment processing, and improvement of the Services' features). You hereby agree that third parties may have access to your Personal Data and other data collected from cookies and logging data only for purposes of performing these limited tasks on our behalf and under obligations similar to those in our Privacy Policy.

Please do not hesitate to contact us (contact@trecento-bc.com) if you wish to get further information about the third party companies and individuals we work with.

3.4. COMPLIANCE WITH LAWS AND LAW ENFORCEMENT REQUESTS; PROTECTION OF THE COMPANY'S RIGHTS

We may also disclose to third parties your Personal Data, or data collected from cookies and other logging data, when we have a good faith belief that disclosure is reasonably necessary to

- (a) comply with a law, regulation or compulsory legal request;
- (b) protect the safety of any person from death or serious bodily injury;

(c) prevent fraud or abuse of the Company, its Services or its users; or

(d) to protect an overriding interest of the Company.

If such disclosure were necessary, we would inform you without any delay of the disclosure.

3.5. NON-PRIVATE OR NON-PERSONAL INFORMATION

You hereby agree that we may, at our discretion, disclose your non-private, aggregated, or otherwise non-personal data, such as usage statistics of our Services.

3.6. TRANSFER OF DATA

In order to provide our Services, you are informed that your Personal Data, or data collected from cookies and other logging data may have to be transferred outside of Switzerland, such as in a country for which the level of data protection is deemed to be sufficient according to the Federal Data Protection and Information Commissioner.

If your Personal Information must be transferred to a country which is not deemed to have sufficient level of data protection, the Company shall inform you and seek your prior written consent in respect to such processing.

4. ACCESS TO DATA, CHANGES AND UPDATES

You may have access to your Personal Data and it is your responsibility to inform us of any changes or required updates to ensure such data remains accurate.

5. DATA RETENTION AND STORAGE

We may retain and use your Personal Data or data collected from cookies and other logging data as long as you use our Service and Platform and as long as necessary to comply with our contractual and legal obligations (in particular according to the Swiss Anti Money Laundering Act, tax regulations and the Swiss code of obligations).

Please note that we will not delete documents that you have in common with other users for whom said documents would be necessary to use our Service and Platform.

6. SECURITY

The security of your Personal Data is important to us. Transmission of Personal Data is encrypted using secure socket layer technology (SSL). We follow generally accepted industry standards to protect the data submitted to us, both during transmission and once we receive it. No method of electronic transmission or storage is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

7. MISCELLANEOUS

The Company shall have no property rights on any data you transfer to the Company or which belongs to you.

You acknowledge that the Company has no obligation to monitor any information related to the Service. You are solely responsible for your conduct, the content of the documents and information you provide, and your communications with others while using the Platform. Furthermore, we are

not responsible for the accuracy, completeness, appropriateness, or legality of files, user posts, or any other information you may be able to access using the Platform.

In addition to the protection of your Personal Data, any data that you transfer to the Company or that we collect on you that is not publicly available shall be treated confidentially by the Company and shall be properly secured pursuant to Article 6 of this Privacy Policy.

8. RIGHTS AND REQUESTS

You have the right to view, amend or delete the Personal Data that we hold about you. If any of the Personal Data we hold on you is inaccurate or incomplete, you may ask us to correct or complete it at any time.

You may also request the deletion of the Personal Data or object to their processing or request to restrict their processing, except in the event that the request is unfounded, for instance in presence of a legal basis or an overriding interest of the Company. You are not required to provide the Company the Personal Data that we request, but if you chose not to do so, we may not be able to provide you our Service or access to the Platform. For Personal Data which requires your consent, you may withdraw it at any time.

You agree to provide a written request to us should you wish to enforce these rights.

If you no longer wish to receive communications from us, please follow the “unsubscribe” instructions provided in any of those communications, or update your account settings, as applicable.

Please contact us at contact@trecento-bc.com for any questions or requests.

9. CHANGES TO OUR PRIVACY POLICY

The Company may periodically update this Privacy Policy. We will notify you about significant changes in the way we treat personal data by sending a notice to the primary email address specified in your account or by posting such changes on our site. By continuing to use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.