

Flixxo – Privacy Policy

Effective Date: March 22, 2019

1. Introduction

We, Flixxo, are a decentralized video distribution platform based on blockchain and bit torrent technology. Flixxo is operated by Flixxo Limited, a Gibraltar company. Our address is Suite 23, Portland, House Glacis Road, Gibraltar. Our mission is to enable any Internet user to become a video distributor, help content authors monetize their production by receiving payment directly from consumers and lead advertisers to have a closer knowledge and relation with their targets. Our primary goal is to contribute to changing the market as we know it today, by eliminating intermediates and favoring peer to peer connections.

We collect your personal information in order to enable your use of the Platform and the Sites, share relevant news and information and maintain a vibrant community of Users worldwide (our “Purpose”). This privacy policy (the “Privacy Policy” or this “Policy”) governs the way we collect, use and disclose your personal information worldwide.

This Policy is also governed by the Terms and Conditions available on our Site. The terms in caps in this document follow the definitions provided in our Terms and Conditions.

2. Scope of this Policy

This Policy applies to the processing of all Personal Information, as defined below, regarding all Users, including all individuals that register on our Platform.

While this Policy is intended to describe the widest range of our information processing activities globally, those activities may be more limited in some jurisdictions based on the restrictions of their laws. For example, the laws of a particular jurisdiction may limit the sorts of personal information we can collect or the ways in which we process that personal information. In those cases, we adjust our internal practices and policies in order to comply with the applicable laws.

3. Personal Information We Process

The term “**Personal Information**” in this Policy refers to information that identifies you or that is capable of identifying you as an individual. The types of personal information that we process (which may vary by jurisdiction based on applicable law) may include:

- your first and last name, email, mobile phone, address, image, locational data;
- information, feedback or content you provide regarding your contact and subscription preferences;
- information collected when you access our Platform or one of our Sites, including the IP address automatically assigned to your computer, the date and time of your visits, the sections you access and the amount of time you spend on each section, the Content you open, the type of device, browser and operating system that you use, and the URL of any websites that you visited before and after visiting our Platform or our Sites;
- information collected when you communicate with us, including emails, messages and logs;

- information, feedback or content you provide in our Platform and our Sites and those of third parties, including publicly available social media profiles, status and information;
- your Flixx activity and all movements in your digital wallet.

You can always visit our Sites without logging in or revealing who you are. Most of the personal information that we use is information that you provide to us. However, in other instances, we process personal information that we are able to infer about you based on other information you provide to us or during our interactions with you, or personal information about you that we receive from a third party. This Policy also applies to the information about you that we receive from others, and which may also be subject to additional privacy policies from third parties.

4. Sensitive Personal Information

Some of the personal information that we process is considered Sensitive Personal Information under the privacy laws of some jurisdictions. Such laws define “**Sensitive Personal Information**” as personal information from which we can learn or infer an individual’s political participation, voting, opinions, religious beliefs or other beliefs of a similar nature, philosophical beliefs; trade union membership or membership of a professional association, physical or mental health conditions, medical treatments, genetic data, sexual life or judicial data (including information concerning the commission or alleged commission of a criminal offence). In some particular instances, financial records may form part of Sensitive Personal Information where you are located. We only process Sensitive Personal Information in your jurisdiction if and to the extent permitted or required by applicable law.

When you agree to this Policy you are, to the extent permitted under applicable laws, granting your express and written consent to the processing of any personal information that you provide to us that is considered to be Sensitive Personal Information. Except to the extent required by law, you may refuse to provide us with any of your Sensitive Personal Information, and this will not affect your participation in our activities or your engagement in our Platform or our Sites.

5. How We Process Your Personal Information

Subject to applicable laws, we may process, collect, use and disclose your personal information in order to:

- contact you and send you relevant news and updates on our activities;
- provide you with a better or more personalized contact, including news and information from a third party (such as sponsors and business partners), and engaging with you across different connectivity platforms and social media channels;
- conduct research, supporter engagement surveys and audits;
- request, process and manage Flixx payments;
- respond to requests for information, including services from a third party (such as sponsors, business partners or other virtual wallets that you authorize);
- provide for the safety and security of our Users and equipment;
- manage and keep our records, perform monitoring and training, facilitate audits and comply with legal and regulatory requirements.

All processing of your personal information is founded on a lawful basis for processing. In most instances, processing will be justified on the basis that: (a) the processing is in Flixxo’s legitimate interests, subject to your interests and fundamental rights; (b) the processing is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a

contract; (c) the processing is necessary for us to comply with a relevant legal obligation (for instance, where we are required to make disclosures by applicable laws); (d) the processing is necessary for the performance of a task carried out in the public interest (including the protection of human rights). In some circumstances, we will use your consent as the basis for processing your personal information, for example, where we are required by law to obtain your prior consent in order to communicate with you.

Before collecting and/or using any Sensitive Personal Information, we will establish a lawful exemption which will allow us to use that information. This exemption will typically be your explicit consent; the establishment, exercise or defense by us or third parties of legal claims; or a context specific exemption provided for under local laws.

We hold your personal information for as long as is necessary to fulfill our Purpose or for a longer period as may be required by applicable laws.

6. Transferring and Disclosing your Personal Information

In some circumstances, we may transfer or disclose your personal information. We will always make such transfer and disclosures under the requirements of all applicable laws. In some jurisdictions, data protection laws may require us to obtain your consent before we transfer your information from your home country to other jurisdictions. When you agree to this policy, you are, to the extent required and permitted under your applicable laws, granting your active consent to the transfer of your personal information to such other jurisdictions for the purpose and with the scope stated in this Policy.

We may transfer and disclose personal information in situations which include:

Our Employees, Partners, Agents, Contractors and Service Providers. We may engage employees, partners, agents, contractors and service providers to assist us in contacting Users for the purpose of managing our supporter contact, events and other activities. Like many other entities, we may outsource the processing of certain activities and/or information to third parties. We take reasonable steps designed to ensure that our employees, partners, agents, contractors and service providers engaged in processing personal data do so under written confidentiality agreements, have received the appropriate training to handle personal data, and are informed of the confidential nature of such personal data. When we do outsource the processing of your personal information to third parties or provide your personal information to third-party service providers, we oblige those third parties to protect your personal information in accordance with the terms and conditions of this Policy, with adequate security measures.

We use Amazon Web Services to run our sites. These service providers and other third parties, including Google, may use cookies to provide a better navigation experience. You can disable these specific cookies that track prior visits for the sake of follow-up advertising by opting out at <https://policies.google.com/technologies/ads>.

Legal Requirements; Compliance with Laws and Law Enforcement. We cooperate with government entities and private organizations to enforce and comply with the law. We reserve the right to share any personal information we have concerning you if we are compelled to do so by a court of law or lawfully requested to do so by a governmental entity. We may also disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal processes, to comply with the law, to protect the safety of any person, or to prevent or stop any activity we may consider

to be illegal, unethical or legally objectionable. We also reserve the right to retain personal information collected and to process such personal information to comply with accounting and tax rules and regulations and any specific record retention laws.

7. Aggregate Information and Non-Identifying Information

We may share aggregated information that does not include personal information and we may otherwise disclose non-identifying information and log data with third parties for supporter analysis, general audits and reports, demographic profiling and other purposes. Any aggregated information shared in these contexts will not contain your personal information.

8. Cookies

We may use cookie technology on our Platform and our Sites to allow us to audit and improve the activities of our Platform and our Sites. Cookies on their own cannot be used to reveal your personal information. They identify your browser, but not you, to our servers when you visit our Sites. If you do not want to accept cookies, you can block them by adjusting the settings on your browser. However, if you block them, you will not be able to use all of the features of our websites.

9. Use of Your Personal Information in Social Media Platforms and Other Websites

Our Platform and our Sites may also contain plug-ins and connectivity features that integrate third party social media platforms into our Sites. If you use such plug-ins the third parties who operate these platforms may be able to identify you, they may be able to determine how you use this website and they may link and store this information with your social media profile. Please refer to the data protection policies of these social media platforms to understand what they will be doing with your personal information.

Users who decide to withdraw Flixx to other virtual wallets outside of Flixxo will be subject to such virtual wallet's terms and privacy policies. This Policy, and our responsibility, is limited to our own information processing practices. We are not responsible for, and cannot always ensure, the information processing practices or privacy policies of other wallets, platform or sites where you submit your personal information directly to them. In addition, we cannot ensure the content of the sites maintained by these third parties or our service providers, even if accessible using a link from our Platform or our Sites. We pledge you to read the privacy and security policies of any third-party wallets, platforms and sites before providing any personal information while accessing those sites.

10. Security

The security of your personal data is important to us. We use Secured Socket Layer ("SSL") software in order to encrypt the personal information that you provide to us. We follow generally accepted standards to protect the personal data submitted to us. Nevertheless, we are aware that no method of transmission over the Internet, or method of electronic storage, is 100 percent secure and we cannot guarantee its absolute security.

The personal information we collect from you online is stored by us and our service providers on databases protected through a combination of access controls, security technology and other state-of-the-art security measures. Nevertheless, such security measures cannot always prevent every loss, misuse or unauthorized changes of personal information and to the fullest extent permitted by applicable law, we are not responsible for any damages or liabilities relating to any such incidents.

We maintain an internal data security policy, which incorporates technical, administrative, and physical security measures designed to ensure the safety and integrity of personal data. Interested individuals may request a copy of our data security documentation, which we will provide under a confidentiality agreement.

We will inform you, as legally required, of any breach of the security, confidentiality, or integrity of personal data stored by us in the quickest fashion and without unreasonable delay. We will take all measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system so that you can take the appropriate actions for the due protection of your rights.

11. Your Rights

You may always choose what personal information you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected. For example, you may not be able to sign a petition without providing your name.

We are committed to respecting your rights over your personal data, including the following rights:

- Right of Access: You may have the right to access the personal data that you have provided us.
- Right to Rectification: You may have the right to require us to correct any of your personal data.
- Right to Erasure: You may have the right to the erasure of personal data that we hold about you.
- Right to Restrict Processing: You may have the right to request that we stop processing your personal data and to stop sending you messages.
- Right to Object to Processing, and right not to provide or to withdraw your consent at any time;
- Right to Data Portability: the right to receive your personal data concerning him or her, in a structured, commonly used and machine-readable format and have the right to transmit the data to another entity without hindrance;
- Right to Decline Automated Decision Making: the right to not be subject to decisions based solely on automated decision making, which produce legal or significant effects for you, except where these are (i) necessary for a contract to which you are a party; (ii) authorized by law; (iii) based on your explicit consent. We currently do not use automated decision making (including automated decision-making using profiling) when processing your personal information. If we ever use an automated decision-making solution, you have a right to request that a decision based on your personal information cannot be solely decided via an automated process.
- Right to lodge a complaint with a supervisory authority, designated by applicable law.

If you would like to exercise any of the above rights, please contact us here so that we may consider your request in accordance with applicable law.

If you want to obtain information about any personal data that we may have about you, you can do so by sending us a written request by letter or email to the addresses set out in the “Contact Us” section below. Please be sure to include your full name, address and telephone number and a copy of a document to prove your identity (such as an ID card or passport) so we can confirm your identity and whether we have any personal information about you, or in case we need to contact you to obtain any additional information to process your request.

We reserve the right to charge you a fee, when permitted under applicable law, for processing any such request. If you send us more than one request, we may respond to your later request by referring to our first response and only identifying any items that have changed. You may request that we correct, erase and stop processing personal information that we hold about you, and we will proceed accordingly as per the applicable law.

12. Changes to this Policy

We may update this Policy from time to time. In such cases, we will post the current version on our main Site, and we will revise the version date located at the top of this document. We encourage you to periodically review this Policy.

13. Contact Us

We have appointed a Data Privacy Officer who may be reached at legal@flixxo.com.

Our main address is Suite 23, Portland, House Glacis Road, Gibraltar.

All requests for access to your personal information must be submitted in writing by letter, form or email and must include a copy of an identity document. We may respond to your request by email, phone or any other suitable method.