



**THRIVE**

**BUILD A BETTER INTERNET**

*Let's Start This Journey. Together*

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## PRIVACY POLICY

This Privacy Policy (together with our terms of use [[https://ico.thrivelabs.io/documents/thrive\\_terms\\_conditions.pdf](https://ico.thrivelabs.io/documents/thrive_terms_conditions.pdf)] and any other documents referred to on it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [<https://ico.thrivelabs.io> or <https://reg.thrivelabs.io>] (the 'Website'), you are accepting and consenting to the practices described in this Privacy Policy.

We are bound by the Data Protection Act (the 'Act'), Chapter 440 of the Laws of Malta. We will protect your personal information and respect your privacy in accordance with best business practices and applicable laws.

For the purpose of the Act, the data controller is Thrive Labs Halmann Vella, Central Office Building, Block A , Level 0, Mosta Road, Ljia LJA 9016, Malta, Registration Number C 79094, VAT Number MT23939330 (the 'Company').

Your privacy is very important to us. We understand you want to remain in control of your personal information and that we must earn and retain our trust. We have created this privacy statement to show our commitment to the privacy of any personal details that you provide us when using our website. We can assure you that we keep your information confidential and do not sell or rent our customers' personal information to third parties.

This Privacy Policy sets out our policies regarding the collection, utilization and protection of the personal information of those using our website. Personal information includes information that is attributable to a specific individual, such as name, address, telephone number, email address and credit card number. When using the Website, you are consenting to the practices set forth in this Privacy Policy.

When browsing the Website, the provision of any person information is not required unless and until you choose to purchase Thrive Tokens or until you sign

up for one of our email newsletters or other services as described below. Minors (persons under the age of 18) are not permitted to use the Website and we will not allow minors to not submit any personal information to us.

## INFORMATION WE COLLECT FROM YOU

In order to purchase Thrive Tokens and services through the Website, essential personal information such as your name, your telephone number, your email address and any additional information required for authenticating a purchase is required. Purchasing Thrive Tokens on behalf of others is prohibited. Information you provide may also be provided to our partners to verify your compliance with any special conditions which might apply.

In order to become a registered customer of the Company, you must provide us certain information that we will require from you in order to do so.

This information includes, but is not limited to personal details such as Full name, address, date of birth, contact details, telephone number, email address, a unique login name, password, password validation, gender, citizenship, information about your income and wealth, including details about your source of funds, assets and liabilities, your inquiries and our responses, information on whether you hold a prominent public function (PEP), profession and employment details, verification information, which includes information necessary to verify your identity such as a passport or driver's license (examples also include background information we receive about you from public records or from other entities not affiliated with us). We obtain this information in a number of ways through your use of our services, including through any of our websites, apps, demo sign-up forms, webinar/events signup forms, subscribing to news updates. This information is collected for various reasons including: (i) for your personal identification; (ii) to enable us and our partners to contact you for customer service purposes; (iii) to tailor the content of our site to meet the customer's needs; (iv) to share certain information with selected partners; (v) to permit us or our partners to verify your compliance with any special conditions which might apply.

We do request your email address to confirm your new client registration and each time you purchase services via our website.

## TRANSFER OF PERSONAL DATA

Our partners are based worldwide and by agreeing to this Privacy Policy, you are consenting to the transfer of your personal data to these selected partners regardless of where they are based. The data that we collect from you may therefore be transferred to, and stored at, a destination outside the European Economic Area ('EEA'). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. We recommend that you check these policies before you submit any personal data to these websites.

We do not trade your personal information to third parties for marketing purposes without your express consent.

## SESSION AND DATA

Generic information about your computer's connection to the Internet, called "session data" will automatically be logged. This information is anonymous and cannot be used to track your personal information. Session data consists of your IP address, operating system and type of browser software being used and the activities conducted by the user while on our website. We collect session data because it helps us administer our website, track correlative information and to collate statistics in relation to visitor traffic. We may use your IP address to help us diagnose problems with our server.

A cookie is a small file of information that is automatically stored by your browser on your computer's hard drive when you enter our website. Cookies can only identify your computer and not the individual user, by storing some basic information which will enable us to identify if you have previously visited our website. Cookies are only read by the server that placed them, and will not plant viruses or harvest your personal data. The use of cookies is very common and the website's use of cookies is similar to that of other reputable online companies.

Any personal data that you provide us with such as your name and address is neither gathered, nor stored in the cookies placed by our website and, as a result, your information will not be passed on to any third parties.

Most web browsers automatically accept cookies but it is possible to change the options on your web browser or use certain software programs, which will enable you to control how and whether cookies will be accepted by your browser. You can disable cookies or set your browser to alert you when cookies are being sent. The Website supports your right to block any unwanted Internet activity, especially that of unscrupulous websites, but if you choose to block our cookies, this may disable certain features on our site and may make it impossible to purchase Thrive Tokens. It is possible however to block cookie activity from certain websites while permitting cookies from sites you trust, like <https://ico.thrivelabs.io/>.

We may also collect your Information in regards to your use of our website(s), such as pages visited, frequency, duration of visit and trading activities. We may, automatically collect information including internet protocol (IP) address, login information, browser type and version, time zone, phone numbers used to call our customer service number.

As our customer, you may opt in at any time to occasionally receive updates from us about Thrive Token, services, events, special offers and other items that may be of interest to you via email, text messages, phone or post. Where previous indication of consent has been provided, it is possible for you to opt out at any time, in order to no longer receive these types of messages either through an opt out feature in the message or through your account settings. Your account settings are accessible on your personal area.

## COMPLIANCE

From time to time, we may transfer your personal and/or financial information to other companies in order to perform or improve our services or to help our security, credit risk or fraud protection activities. As mentioned above, we may also send your personal information to our partners. By submitting your details, you are providing consent to the transfer of your information for the purposes set out in this paragraph. Any transfer of information will take place in accordance with this Privacy Policy and as permitted by law.

In the event that the Company is sold, or transferred some of its assets to another party, our customer information will most likely be transferred in connection with such acquisition. If your personal information is transferred, use of such information would remain subject to this Privacy Policy. Your personal information will be passed on to a successor in the event of liquidation or change of administration of the Company.

You should be aware that in addition to the circumstances described above, we may disclose your financial or personal information if required to do so by law, court order, as requested by other government or law enforcement authority, or in the good faith belief that disclosure is otherwise necessary or advisable including, without limitation, to protect the rights or properties of the Company or its affiliated companies or when we have reason to believe that disclosing the information is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

All information you provide to us is stored on our secure servers. We limit access of Your Information only to authorized employees that need to know the information in order to enable the carrying out of the Agreement between us. The authorized personnel have access to Your Information via a username and password. We secure all personal information as it is transferred to us and thus we make all necessary effort to prevent unauthorised parties from viewing any such information. We have procedures in place regarding how to safeguard and use Your

Information, for example by requesting our Affiliates and employees to maintain the confidentiality of Your Information. We will not keep Your Information for any longer than is required. In many cases, information must be kept for considerable periods of time. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

Under Applicable Regulations, we will keep records containing Client personal data, communications and anything else which relates to the Client for at least five years after termination of the Agreement between us.

## CHANGE OF INFORMATION

You may inform the Company at any time that Your Information has changed or that you wish the Company to change information we hold about you by emailing us at [support@thrivelabs.io](mailto:support@thrivelabs.io)

We will change or delete Your Information in accordance to your instructions, except to the extent that we are required to hold Your Information for regulatory or legal purposes, to provide you with the Services you have requested or to maintain adequate business records.

## RIGHT OF ACCESS

Under the Processing of Personal Data (Protection of the Individual) regulation, as amended or replaced from time to time, you as a natural person have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. To make a request, please contact us, verifying your identity and specifying what information you require.

You may contact us via e-mail at [support@thrivelabs.io](mailto:support@thrivelabs.io)



## CHOICE/OPT OUT

If you no longer wish to receive any communication from us, you may opt-out of by following the relevant instructions included in each communication sent by us. We reserve the right to contact you, despite the fact that you have opted out, in cases where we deem such contact as necessary.

## EFFECTIVENESS

This policy is effective as from 01.01.2018. Any material changes in the way we use personal information will be described in future versions of this Privacy Statement. This Policy is subject to change without notice. For this reason, you are advised to look for updates from time to time.

## CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to [support@thrivebio.com](mailto:support@thrivebio.com)