

Fabwelt Privacy Policy

Last revised on August 12, 2022

1. Introduction

This Privacy Policy describes how Fabwelt Studios Limited, including but not limited to, their legal persons, unincorporated organisations and teams that provide Fabwelt Services (collectively, the "**Fabwelt Operators**", "**we**", "**our**", and "**us**"), collect, use, process, disclose, share, transfer, and protect the information you provide on the Fabwelt website ("**fabwelt.com**") as well as our applications and games (collectively as "**Fabwelt Platform**"). This Privacy Policy constitutes a part of the Terms and Conditions of the Fabwelt Platform ("**Terms**"). The defined terms when used in this Privacy Policy shall bear the same meaning given to such terms as those stipulated in the Terms, unless otherwise indicated herein.

We respect and value your privacy as well as the integrity of the information you have provided and/or permitted us to collect. Thus, we endeavor to follow industry standards to ensure the security and confidentiality of your Personal Information (as defined below) when you access the Fabwelt Platform or use the Fabwelt Services.

When accessing, registering, downloading, using, clicking or engaging in any of the Fabwelt Services provided on the Fabwelt Platform or 3rd Party platforms, you are strongly advised to carefully read, acknowledge, understand and accept all terms stipulated in this Privacy Policy. Unless upon providing you with a prior notification and obtaining your consent, we will not use your Personal Information, in any form, for any other purposes other than those indicated in this Privacy Policy or the Terms.

This Privacy Policy has incorporated several provisions from the General Data Protection Regulation ("**GDPR**"), in particular with regard to the rules governing the processing of Personal Information within the European Economic Area (EEA) and the United Kingdom respectively.

This Privacy Policy shall inform you about the following matters among several others:

- Acceptance of the Privacy Policy;
- Personal Information collected by us;
- How we collect Personal Information;
- How we use Personal Information;
- How we store Personal Information;
- How long we retain Personal Information;
- Cookies;
- Sharing your Personal Information;
- Third-Party collection of Personal Information;
- Your legal rights;
- Limitations for age and data breaches;
- Updates or amendments to the Privacy Policy;
- How to contact the Fabwelt Operators.

2. Acceptance of the Privacy Policy

By accessing, using or engaging in the Fabwelt Services, you indicate and confirm that you have agreed to the terms of this Privacy Policy. Unless upon providing you with a prior notification and obtaining your consent, we will not use your Personal Information for any purposes other than those indicated in this Privacy Policy or the Terms unless we are entitled or required to do so by Applicable Laws.

If you do not agree, either partially or wholly, to this Privacy Policy, you must immediately discontinue accessing, using or engaging in the Fabwelt Services and the Fabwelt Platform.

3. Personal Information that we collect

For the purposes of this Privacy Policy, your Personal Information is information that can be used to identify, describe, relate, or associate with a particular individual and includes “personal data” as defined in GDPR. The following are the types of information we collect and store when you use the Fabwelt Services (collectively, the “**Personal Information**”):

Information provided by you when registering to the Fabwelt Platform

When you first sign up to use the Fabwelt Services by opening a Fabwelt Account, you may be required to provide with us your real name, date of birth, nationality, home address, email address, signature and other information which can be used to verify your identity.

Generally, we will not collect nor process “Sensitive Information” (defined in GDPR as “special categories of personal data”), such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data that uniquely identify specific persons, or any information concerning health or sexual orientation. However, if you are using biometric authentication methods to sign into your Fabwelt Account and so are required to provide us with your fingerprint data or facial recognition data we shall need to seek your explicit consent to process such biometric data to comply with our legal obligations.

Information collected by us for compliance purposes

In order to comply with domestic and international industry standards, government rules and regulations, in particular the Anti-Money Laundering (AML) regulations, Know Your Customer (KYC) rules and Counter-Terrorist Financing (CTF) regulations, the Fabwelt Operators and Third Party Service Providers are required to collect and retain your Personal Information from identification documents, such as your passport, national identification card, driver’s license, tax identification and visa. Other documents which we may use are, including but not limited to, your proof of address, source of funds declaration, purpose and source of wealth.

Information collected by us during your usage of the Fabwelt Services

When you engage or use the Fabwelt Services, we will monitor and track your Personal Information in relation to your usage of the Fabwelt Services such as your IP address, phone number, blockchain addresses, the type of device you use to access the Fabwelt Platform, device information, operating system and hardware settings, browser type and network operator. This information shall either be directly obtained by the Fabwelt Operators or through Third Party Service Providers.

We collect this type of information to ensure that our interface and/or the Fabwelt Platform is seamlessly accessible for all permitted Users around the world and in order to provide you with the Fabwelt Services.

Communication of Personal Information

You hereby agree that we are entitled to collect and use the Personal Information you have provided on the Fabwelt Platform or generated through your usage of the Fabwelt Services for the purpose of communicating with you through messages, requests, emails, telephone conversions, voicemails, live chats. Such information will include file attachments in connection with your transactions on the Fabwelt Platform, or any other information related to your contact with the Fabwelt Operators.

Financial Information

You hereby agree that, for the purposes stipulated in this Privacy Policy, we are entitled to collect and use the information contained in or related to your financial information as provided by you during the usage of the Fabwelt Services. This includes, without limitation, your transaction history, such as your initial transfer of cryptoassets, withdrawal requests, digital wallet/blockchain address(es), bank name, bank account information and payment card number.

We also collect and process this financial information to monitor any suspicious financial activities in order to protect Users from fraud, resolution of legal cases, as well as any other purposes as disclosed in this Privacy Policy.

4. How we collect Personal Information

We will automatically collect and process Personal Information provided by you under the following situations:

- when you register for a Fabwelt Account, log in, or visit the Fabwelt Platform;
- when you voluntarily complete any user survey or provide feedback to us via emails or any other electronic channels;
- when you use browser cookies or any other relevant software upon visiting the Fabwelt Platform; and
- other situations where we may automatically collect your information as described in this Privacy Policy or our Terms.

Where we ask you for your Personal Information which you are obliged to provide to us you may decline to provide it to us but if you do so we may not be able to enter into or to perform our contract with you to provide the Fabwelt Services and we may have to terminate our relationship. For other Personal Information which you may not be under an obligation to provide to us but which we seek from you, if you do not provide it then we may not be able to properly perform our arrangements with you.

Information collected by the third-party

We shall collect your Personal Information from third parties as required or to the extent permitted under any Applicable Laws. Information from the third-party sources shall include, but not be limited to, public databases, credit bureaus, ID verification partners, blockchain data, marketing partners and resellers, advertising partners, and analytics providers.

Anonymised and Aggregated Data

We will also process other Personal Information to convert it into the form of anonymised and aggregated information, where all information shall be combined and then anonymised making it unusable for the identification of a specific individual. We use anonymised or aggregated Users' information for the purposes stipulated in this Privacy Policy at any time, including gaining a better understanding of Users' needs and behaviors, conducting business intelligence and marketing initiatives and detecting security threats. In this regard, we reserve the right to implement innovative technologies as they become available to be used for

strategic planning and operational processes.

5. How we use Personal Information

Your Personal Information shall be made available to the Fabwelt Operators, our affiliates and service providers, and/or within our group of companies. This will include, but not be limited to, the employees and/or any persons or Third Party Service Providers working with the Fabwelt Operators who are responsible for using and protecting your Personal Information. Where it is necessary (e.g., to protect the vital interest of the users or other natural persons, to fulfil the purpose of public interest, or to pursue our legitimate interest without overriding your rights and freedoms), we may use and process your Personal Information without obtaining your consent.

We use and process your Personal Information for the following purposes or in the following manners:

To provide the Fabwelt Services

We use your Personal Information, either collected or delivered, in order to maintain and provide efficient Fabwelt Services in accordance with our contractual obligations owed to you (including, but not limited to, processing transactions) and, for our and your legitimate interests, to improve the efficiency of day-to-day Fabwelt Services and, to comply with our legal obligations, to verify your identity. We use IP addresses and unique identifiers stored in your device's cookies to help us authenticate your identity and activities and provide the Fabwelt Services.

To protect Users as part of the provision of Fabwelt Services

In order to comply with our legal obligations we use the information collected to protect the Fabwelt Platform, Users' Fabwelt Accounts and archives. We also use IP addresses and cookies to detect any suspicious activities and to protect against automated abuse, such as spam, phishing and Distributed Denial of Service (DDoS) attacks.

To comply with the relevant legal rules and regulations

For our legitimate interests and to comply with our legal obligations, we shall use the Personal Information in compliance with our legal obligations, global and local industry standards, government requests and our AML/KYC/CTF procedures.

For measurement, research and development purposes

For our and your legitimate interests, we actively measure and analyse your Personal Information to understand the way you use and interact with the Fabwelt Services. This review is continuously conducted by our operational teams to continuously improve the Fabwelt Platform's performance and to resolve issues with User experience.

In addition for the same reasons, we use such information to customise, measure and improve the Fabwelt Services, our administration, the content and layout of the Fabwelt Platform, and to develop new services for you.

For communication purposes

We use your Personal Information, collected or derived from your communication devices or your email address, to interact with you directly, to provide you with necessary support and/or to keep you informed of logins, transactions, the Fabwelt Account security details, as well as other aspects. All direct communications shall be appropriately maintained with the Fabwelt Operators or Third Party Service Providers designated to be reviewed for accuracy, retained as evidence, or used to perform other statutory

requirements or other obligations as stipulated in this Privacy Policy, the Terms or any other privacy policy of any relevant Third Party Service Provider. This is in your and our legitimate interests and to enable us to perform the contract we have with you and to comply with our legal obligations.

To enforce the Terms

Personal Information is also used, for our legitimate interests, to continuously and actively enforce our Terms among our Users. Activities in this regard include, but are not limited to, reviewing, investigating and preventing any potentially prohibited or illegal activities that may violate preceding provisions, or disclose relevant information to third parties in accordance therewith. In light of this, we reserve the right to suspend or terminate any of the Fabwelt Services to any Users who are found to be engaged in any activities that violate our Terms.

For marketing and advertising

For our legitimate interests, we may share your Personal Information with our marketing partners for the purposes of targeting, modelling and/or identifying analytics as well as marketing and advertising services which are the same as or similar to the Fabwelt Services. In any marketing communications which are sent to you, you will be advised as to how you can opt-out of receiving any further marketing communications from us or such partners.

For rebates

For your referrer's and our legitimate interests, we shall share the Personal Information collected from you, including but not limited to, your identification information and transaction information, with your referrer for the purposes of rebates and other benefits.

For other purposes

Save as provided in this Privacy Policy and the Terms, unless upon providing you with a prior notification and obtaining your consent, we will not use your Personal Information for any other purposes other than those indicated in this Privacy Policy or the Terms.

6. How we store your Personal Information

We shall take great care in implementing and maintaining the security of the Fabwelt Services as well as that of your Personal Information. We employ procedures and policies that incorporate industry best practices to ensure the integrity of your Personal Information and to prevent instances of unauthorised use.

The Fabwelt Platform's security is fully integrated into Amazon Web Services, covering all aspects of security such as identity management, connection security, application security and database security for User's interactions with the Fabwelt Platform.

Please note that it is impossible to fully guarantee the security of your Personal Information. While we take reasonable steps to safeguard your Personal Information, we disclaim any liability for the acts committed by those who gain unauthorised access or abuse your information and services unless caused by our gross negligence. Thus, you are recommended to understand this responsibility and to independently take the necessary safety precautions to protect your Personal Information, in particular your credential information, such as your username and password. You hereby agree that we shall not be liable for any information leakage and/or other losses not caused by our gross negligence, including but not limited to, hacker attacks, power interruptions or unavoidable technical failures.

7. How long we retain your Personal Information

We may be required by Applicable Laws to retain certain information, including Personal Information of Users, Users' profiles, identification verification materials, information relevant to AML/KYC/CTF procedures, account information, account agreements, and other agreements between us and third-parties, account statements, and other records.

Such records shall generally be retained as required by law for the minimum amount of time necessary to accomplish the purpose for which it is collected and thereafter no longer than is permitted under Fabwelt Operators' Information Retention Policy.

However, even after you have deactivated your Fabwelt Account, we may retain copies of information about you and any transactions or services which you may have participated in for a period of time in accordance with the applicable laws, statute of limitations or as we believe as reasonably necessary to comply with the applicable laws, regulations, legal procedures or governmental requests in order to detect or prevent fraud, outstanding fees, resolve disputes, address problems with the Fabwelt Services, assist with investigations, enforce any of our Terms or other applicable agreements or policies, or to take any other actions consistent with Applicable Laws.

8. Cookies

We shall use cookies and other technologies or methods of web and mobile analysis to gather, store and track certain information related with your access to and activities through the Fabwelt Services, including when you visit the Fabwelt Platform. This information will be retained in accordance with our Cookie Policy which can be viewed [here](#).

9. Sharing your Personal Information

We shall not rent, sell, or disclose your Personal Information to any third parties, except as set out in this Privacy Policy, to those who require access to the Personal Information to perform their tasks and duties and to share with third parties who have a legitimate interest in accessing it.

We may share, transfer, disclose, or allow access to your Personal Information to the following third parties for the purposes described below:

- We may disclose Personal Information to the third parties in order to administer or process a transaction, to provide the Fabwelt Services you have authorised or requested, or in the context of facilitating the execution of a transaction.
- We may be required to validate your identity by Applicable Laws and rely on third-party services to perform these validations. Personal Information that you provide to us during the account opening process is passed to these services at account opening and on an ongoing basis thereafter.
- We provide Personal Information that you provide during the account opening process, as required by the Applicable Laws and regulatory requirements, to carry out or aid in certain functions, including, but not limited to, account processing, surveillance, reconciliation, execution, document retention requirements, and document dissemination.
- We share your Personal Information with financial institutions with which we partner to process payments which you have authorised.
- We may share analysis based on anonymous User information or behavior with our affiliate companies in order to operate and improve our products and services.
- We may disclose or transfer your Personal Information to a purchaser or potential purchaser of our business, to our investors in and lenders to our business and to our financial and professional advisors.
- We may disclose or transfer information we collect upon account closing where you have a deficient balance, or upon excessive instances where you do not have sufficient funds in your account.

- We may disclose your Personal Information for certain promotions and special offers when the nature of the promotion or special offer requires us to gather and share your Personal Information (such as your email address) with a third-party for delivery of goods or services. Please note that, should you choose to purchase a product or service offered by another company by way of a promotion or special offer, any Personal Information you share with that company would no longer be governed by this Privacy Policy.
- We may disclose Personal Information to third parties that provide services to us to enable us to provide the Fabwelt Services, including but not limited to, consulting, sales, client support operations, payment processing, authentication services, and technical support or services.
- We may share your Personal Information with law enforcement and government officials, or any other third parties where we are required to do so under any applicable law, regulation or by order of any court of competent jurisdiction or any competent judicial governmental or regulatory body or exchange rule, or when we believe in good faith that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of our Terms or any other applicable policies.

Other circumstances under which we may disclose your Personal Information are as follows:

- comply, as necessary, with any relevant Applicable Laws;
- in order to perform our contractual obligations to you;
- respond to mandatory legal or governmental requests or demands for information;
- meet national security requirements;
- enforce our agreements, policies, procedures and/or Terms;
- where it is in our legitimate interests to do so and our right to do so is not overridden by your rights and freedoms;
- protect ourselves, our affiliates, our Users, our counterparties or the general public from illegal activities; and
- respond to a vital emergency that requires disclosure of specified information.

Save as provided in this Privacy Policy or in the Terms, we will not disclose to third parties your Personal Information, such as details of your Fabwelt Account or the transactions you made.

You are entitled to opt-out of having your Personal Information shared with third parties, or from allowing us to use your Personal Information for any purposes which are incompatible with the purposes for which we have originally collected or subsequently obtained your authorisation as stipulated in this Privacy Policy.

All independent affiliates and third parties with whom we share your Personal Information have their own privacy policies. However, we expect them to protect your Personal Information in accordance with provisions which are substantially similar to those provided in this Privacy Policy.

10. Third-Party Collection of Personal Information

This Privacy Policy only addresses the use and disclosure of the Personal Information we collect from you. To the extent that you disclose your information to other parties through the use of the Fabwelt Services, such as by clicking on a link to any other websites, different rules regarding privacy policies may apply to their use or disclosure of the Personal Information you disclose to them. We recommend that you read the privacy policies of such third parties before disclosing any Personal Information to them.

You hereby acknowledge that we shall not be responsible for the products, services, or descriptions of products or services that you receive from the third-party websites or for the content or privacy practices of those websites. Also, this Privacy Policy shall not be applied to any such third-party products and services that you access through the Fabwelt Platform. You knowingly and voluntarily assume all risks of using third-

party websites to purchase products and services, and you agree that we shall have no liability whatsoever concerning such third-party websites and your usage of them.

11. Your Legal Rights

Under certain circumstances, you have the rights under the data protection laws in relation to your Personal Information. These rights include but are not limited to the following:

Right to be informed

You have the right to be informed about the collection, use, and processing of your Personal Information. This Privacy Policy is intended to provide this information but please contact us as set out below if you require any further information.

Right of access

You have the right to obtain access to the Personal Information we hold about you and specific information regarding our processing of this information.

Right to rectify

You have the right to require us to rectify your Personal Information that is inaccurate. You can check your account details at any time by signing into your Fabwelt Account and clicking the profile.

Right to erasure

You may require us to have your Personal Information deleted from our records where certain conditions are met.

In order to deter fraudulent activities by ensuring that those who try to commit fraud shall not be able to avoid detection simply by closing their Fabwelt Accounts and opening new accounts, we shall mark your Fabwelt Account in our database as "Closed," but shall keep certain account information, including your request to erase your Personal Information in our database for a period of time. However, if you close your Fabwelt Account, your Personal information shall not be used by us for any further purposes, nor shared with third parties, except as necessary to prevent fraud and to assist law enforcement as required by Applicable Laws or in accordance with this Privacy Policy.

Right to data portability

You reserve the right to request to transfer a machine-readable copy of your Personal Information to you or the third-party of your choice. We shall provide you, or the third-party, your Personal Information in a machine-readable format. This right only applies to Personal Information you have provided to us to use.

Right to restrict processing

You may request us to restrict or suppress the processing of your Personal Information under certain circumstances as follows:

- to establish the accuracy of the Personal Information;
- when the processing is considered unlawful, but you do not wish to have your Personal Information erased;
- where we no longer need to process your Personal Information, but the information must be retained for legal reasons; and
- where you have objected to our processing your Personal Information, but we need to determine whether our legitimate interest overrides your objection.

Right to object

You may object to our reliance on our legitimate interests as the basis of us processing your Personal Information which may impact your personal rights. You may also object to our processing of your Personal Information for any direct marketing purposes.

Right to withdraw consent ("Opt-out")

You reserve the right to withdraw your consent at any time where we are relying on it to process your Personal Information. Withdrawing your consent does not affect the lawfulness of our processing of your Personal Information prior to withdrawing and we are entitled to continue processing your Personal Information where we have other legal bases for doing so.

If you wish to exercise these rights as aforementioned, please inform and contact us via the Fabwelt Platform as set out below.

Right to lodge a complaint with a privacy regulator

You have the right to make a complaint to your local privacy regulator. If you wish to make a complaint, we would ask that you contact us before you contact the regulator so that we may see if the issue can be resolved first. You can also contact your local privacy regulator if you have any concerns regarding your rights under local law.

12. Limitations for age and data breaches

The Fabwelt Services are not designed for the individuals who are under the age of 18 or under the legal age to provide consent under the applicable laws of the country or jurisdiction where you are using the Fabwelt Services.

If you are not over 18 or of the legal age of your country, you shall not provide any Personal Information to us, or to engage in the Fabwelt Services. We reserve the right to access and verify any Personal Information collected from you. If we become aware that you are under 18 or under the legal age and you have already shared your Personal Information with us, we shall then discard such information and terminate your Fabwelt Account immediately.

We cannot guarantee that any losses, misuses, unauthorised accession, or alteration of your Personal Information shall not occur. You hereby agree that you play a vital role in protecting your Personal Information, including your credentials. When registering with the Fabwelt Services, you are strongly recommended to choose a password with the sufficient length and complexity and to not reveal this password to any third parties or unauthorised persons. Also, you agree that you shall immediately notify us if you become aware that unauthorised persons have accessed or might access your Fabwelt Account.

13. Updates or amendments to the Privacy Policy

We shall revise and update this Privacy Policy periodically, at our sole discretion, and the most current version shall be published on the Fabwelt Platform (as reflected in the "Last Revised Date" heading). In the event of any material changes which may affect your usage on the Fabwelt Services and the Fabwelt Platform, we shall notify you through your email address or other communication channels you provide to us. We encourage you to review this Privacy Policy regularly.

If you do not agree, either partially or wholly, the revised Privacy Policy, you should discontinue accessing or using our Services. Your continued access to and use of the Fabwelt Services after any changes to this Privacy Policy constitutes your consent to any changes we have made.

14. How to contact Fabwelt Operators

For any questions regarding this Privacy Policy, your Personal Information collected or processed by us, or in case you would like to exercise one of your legal privacy rights as stipulated in Clause 11, please submit your requests to support@Fabwelt.com and visit our website at <https://www.Fabwelt.com>.