



CROWD1 – PRIVACY POLICY

Last updated: June 25th, 2020

Welcome to Crowd1!

Crowd1 Network Ltd. ("Crowd1") holds registered offices; address at Crowd1 Network Ltd., HDS Tower, Unit no. 3408, Jumeirah Lakes Towers, P.O. Box 393243 Dubai, United Arab Emirates ("the Company").

Crowd1 ("us", "we", or "our") operates the www.crowd1.com website (the "Service").

What does this policy cover?

This page informs you of our policies regarding the collection, use and disclosure of Personal Information when you use our Service.

We will not use or share your information with anyone except as described in this Privacy Policy.

We use your Personal Information for providing and improving the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible at www.crowd1.com.

References in this policy to the **Company**, **we** or **us** shall mean Crowd1 Network Ltd., HDS Tower, Unit no. 3408, Jumeirah Lakes Towers, P.O. Box 393243 Dubai, United Arab Emirates.

References in this policy to **your sponsor** shall mean the Sponsor who sponsored you to become an Independent Representative), and **your Sponsors** shall represent your Sponsor together with your Sponsor's upline sponsors within the Crowd1 Network who will have access to your personal information in accordance with this Policy. Your Sponsor's details are behind the login.

For the purpose of the applicable data protection law (including the General Data Protection Regulation 2016/679 (" **GDPR** "), each of the Company's and your Sponsor is an independent data collector of your personal data).

INFORMATION COLLECTION AND USE

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to your name, phone number, postal address, e-mail address. ("Personal Information").

Personal information collected from you:

The company collects information from you when you fill out a form on the site, when you buy Crowd1 products on the site, when you fill in your personal information during the registration process, when you participate in a discussion call ("Webinar"), when you participate in other social media on the site, when you submit information to a competition, when you participate in a marketing or survey on the site, or when you otherwise communicate with the company (for example, when you contact our customer service).

The following information is collected:

Name*;
Date of birth;
Postal code*;
Delivery address *;
E-mail address *;
Telephone and mobile numbers;
Your password*;
Opinions or statements you make on our discussion boards or in other communications with us;

Any other information you provide to us during the use of our website, during communication with us or our representatives or through posts and messages that you post or send via our social media.

The fields above marked with a () are mandatory fields - if you do not provide such personal information, the company will not be able to fulfill the purposes described below. For example, if you do not enter your mailing address, we cannot deliver your order or cannot process your bank payment.*

Personal information we collect about you:

The company handles personal information related to your purchasing history, such as the products you have purchased, your product preferences, how often you make purchases with us and if you have been referred to us by one of our Independent Representatives.

The Company automatically collects the following personal information at each visit to the Website:

Your computer's technical information, including your Internet Protocol (IP) address used to connect your computer to the Internet, your login information, your browser type and web version, your time zone settings, your browser plug-ins and browser versions, your operating system and your operating platform;

Information about your visit to the Site, including the complete Uniform Resource Locators (URL) to, via and from the Site (including the date and time);

Products you looked at or searched for, page reaction times, download errors, length of visit to certain pages, page interaction information (for example, scrolling, clicking and moving the pointer across the screen), methods used to scroll away from the page, and all contact methods used to contact our customer service;

Information obtained through the cookies that the company places on the website - see below in the 'cookies' section for more information.

HOW IS YOUR PERSONAL DATA USED, AND WHAT IS OUR LEGAL BASIS FOR THIS USE?

The company processes your personal data for the following purposes:

1. Contractual

This is required to establish and fulfill the contract with you, for example if you make a purchase. This includes verifying your identity, making payments, communicating with you, providing customer service and arranging deliveries, awards or services.

2. Legitimate Interests

This is required to carry out legitimate interests, specifically:

- a. to be able to communicate with you;
- b. to be able to invite you to participate in conferences, events;
- c. to enable monitoring, enhancement, administration and protection of our products, our content, our services and our website, both online and offline;
- d. to market products effectively by personalizing the website and our products and services to suit you, and enable you to participate in interactive features of the site;
- e. in order to investigate and handle any complaints from you regarding the website, our products and our services;
- f. to monitor our client accounts to prevent, investigate and / or report fraud, terrorism, distortion, security incidents or crimes in accordance with applicable law; and
- g. to measure or understand the effectiveness of our marketing, and to be able to deliver relevant marketing to you (including conducting consumer surveys and similar studies).

LOG DATA

We collect information that your browser sends whenever you visit our Service ("Log Data").

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics.

GDPR DATA PROTECTION

On May 25, 2018, the General Data Protection Regulation came into effect across European Union (EU) member states, impacting any organization that processes personal data of EU individuals. GDPR represents a strengthening and harmonizing of existing data privacy rights for individuals in the European Union.

Crowd1 is committed to protecting personal data of our EU employees, contractors, customers, and vendors, regardless of where that data is processed. We have an extensive security program and an established set of policies in place across our company departments to ensure that personal data of EU individuals is processed accordingly and fully protected in our systems.

All European user data is stored in an encrypted format on European servers. The information may be accessed by employees of Crowd1 in Canada, Hungary, Nigeria, Philippines, Slovakia, Slovenia, South Africa, Spain, Sweden and the USA. in order to provide services to our European users. When this occurs, information is transmitted in an encrypted format to ensure the highest level of data protection.

The following portions of our privacy policy apply specifically to European users and are designed to comply with GDPR regulations.

Information specifics:

Crowd1 specifically gathers the following information from users:

- IP Addresses, Browser information, User agent information, Cookie information (Persistent and Session Cookies)

Users who create accounts are asked to provide:

- Name, Address, Phone Number, Date of Birth, Email Address, ID Documents for KYC/AML procedures

Additional information that may be requested:

- Cryptocurrency address information
- Additional KYC information
- Banking information

When processing the personal data of EU individuals, we:

- Ensure there is a legitimate business reason to collect the data;
- Ensure we have consent to collect and use the data (where required);
- Limit collection, storage and usage of the data only to the extent for which there is a business reason and consent.

For easier breakdown of how your data is used and why the Company will provide a chart with the breakdown of data collection purposes:

PERSONAL DATA	IS THE PROVISION OF PERSONAL DATA A LEGAL OR CONTRACTUAL REQUIREMENT OR REQUIREMENT NECESSARY TO CONCLUDE AN AGREEMENT?	POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE SUCH INFORMATION
Name*	Contractual requirements	If you do not provide this information, you will not be able to register as a Member, Affiliate, Affiliated Partner, Affiliate Member, Potential Member, Free Account Member, Interested Customer, or Subscriber of any sort
Date of birth		
Postal *	Statutory requirements	We must report your income to the tax authority and without this information we cannot fulfill this obligation if governmental authorities request it
Shipping Address *	Contractual requirements	If you do not provide it, we will not be able to deliver your order for physical products
E-mail address	Contractual requirements	If you do not provide this information, you will not receive updates on business changes or newsletters
Telephone number and mobile phone number		
Your password*	Contractual requirements	Without the password, you cannot create your account in our online system because the information must be secured
Personal identification number	Contractual requirements	Without this PIN creation you will not be able to request withdrawal. This security feature has been created to reduce financial loss on withdrawals.

Your Sponsor's name and Sponsor's consultant number		
National tax code or number *;	Not required as independent representatives are solely responsible to report all income to their country of residence.	
Social security number / personal		
Bank account information * Cryptocurrency Wallet address info	Contractual requirements for consultants who receive some payments.	We distribute the payments to our consultants via bank transfers. Without the bank account, we will not be able to pay any amount to you.
Passport number (for the Affiliates participating in international conferences) *	Contractual requirements for Affiliates attending conferences.	The international conferences require cross-border travel and without your travel document information we cannot arrange it.

The fields above marked with a () are mandatory fields – if you do not provide such personal information, the Company and / or your Sponsor will not be able to fulfill the applicable purposes described in this Policy.*

KYC INFORMATION REQUIREMENTS:

Crowd1 can only service its clients by abiding by the KYC requirements of knowing who their clients are. Crowd1 may ask for the following documents and details in order for Crowd1 clients to be able to use some or all the functions on the Crowd1 platform.

Accepted Documents:

- Driver's License;
- Passport;
- Residence Card;
- Phone Bill;
- Utility Bill;
- Credit Card statement with address showing

We require a clear photo image of the front and back of your photo ID that is not expiring within 6 months from the date of registration. All ID's sent must have a valid expiry date and must be visible and not tampered in any way.

The client may also be asked to submit a bank statement / Credit card statement or utility bill that is **not more than 3 months old** that clearly shows the address. These addresses must match with the information submitted in the clients back office.

If the client is registering as a Company they must submit the following:

- Company business registration that clearly shows the owner/directors
- Copy of passport of the owner(s) the ID must match with the named owners as the business registration
- A selfie with the photo ID submitted that states "Crowd1 and the current date"

In certain cases you may have to submit some of these documents via email to the compliance department or through the support channel via your back office.

BELOW ARE SOME HIGHLIGHTS OF HOW CROWD1 IS ENSURING COMPLIANCE WITH GDPR:

Data Breach Response Plan: In the event of a data breach that may impact the security of employee, customer, or vendor personal data, we will take steps to notify EU authorities within 72 hours of discovery of the incident.

Data Privacy Impact Assessment: When initiating new projects or products, implementing new software, or on-boarding new vendors that may process personal data of EU individuals, we will assess data privacy impact in order to ensure that personal data is adequately protected in any systems or processes controlled by Crowd1.

Data Subject Rights: We understand that anyone doing business with us may have questions about the types of personal data Crowd1 processes about them. If you would

like to make a request about the personal data Crowd1 processes, please email your request to the email below.

Removal of your Information: We understand and respect any member/customer that wishes to remove their personal data within our business or close their account with us can do so in writing and request for some or all of their data to be removed. We ask that you email the company directly at support@crowd1.com. We wish to inform all customers/members that there will be specific information required to conduct business with Crowd1 and removal of some or all of your information will limit your use of the site. If you have questions please contact support@crowd1.com.

DATA PROTECTION

We collect, use and store your personal data exclusively within the scope of the provisions of the UAE laws and resolutions regarding data protection. We will inform you about the nature, scope and purpose of data collection and use.

COLLECTION AND PROCESSING OF DATA

Any access to our website and any retrieval of a file deposited on this website will be recorded. The storage serves internal system-related and statistical purposes. Logged: Name of the retrieved file, date and time of the retrieval, transferred data volume, message of successful retrieval, web browser and requesting domain. Additionally, the IP addresses of the requesting computers are logged. Further personal data will only be collected if the user of the website and / or customer makes voluntary information, e.g. in the context of a request or registration or to conclude a contract or through the settings of his browser.

If the user of the website and / or customer wants to prevent the use of cookies, he / she can do this by locally making changes to his / her settings in the Internet browser used on his computer, i.e. the program for opening and displaying Internet pages (e.g. Internet Explorer, Mozilla, Firefox, Opera or Safari).

USE AND DISSEMINATION OF PERSONAL DATA

If the user of our website has provided personally identifiable information, we will only use it to respond to requests from the user of the website and / or customers, to deal with the user of the website and / or customers of closed contracts and for technical administration. We will only pass on or transmit personal data to third parties if this is necessary for the purpose of contract processing or for billing purposes, or if the user of the website and / or customer has previously consented. The user of the website and / or the customer has the right to revoke a consent given with effect for the future at any time.

The deletion of the stored personal data takes place if the user of the website and / or customer revokes the consent to the storage, if their knowledge for the fulfilment of the purpose pursued is no longer required or if their storage is prohibited for other legal

reasons. Data for billing purposes and for accounting purposes are not affected by a deletion requirement.

COOKIES

Our website uses cookies. A cookie is a text file that is sent when you visit a website and is temporarily stored on the hard disk of the user of the website and / or customer. If the relevant server of our website is called again by the user of the website and / or customer, the browser of the user of the website and / or of the customer sends back the previously received cookie back to the server. The server can then evaluate the information obtained by this procedure in various ways. Cookies can, for example, control advertising inserts or facilitate navigation on a website.

WHAT COOKIES WILL BE USED ON THE SITE?

The site uses cookies (small files placed on the site user's hard drive) to distinguish you from other users of the site. This helps us provide you with a high quality experience as you browse the site and also lets us improve the site. We use cookies to analyze the information flow; customize the services, content and advertising; measuring campaign effectiveness; and promote trust and security.

We offer certain services that are only available through the use of cookies. In general, there are the following categories of cookies:

- 1. Strictly necessary cookies**

Some cookies are fundamental to the operation of the website. For example, some cookies allow us to identify registered users and make sure they can access the site. If a registered user chooses to disable these cookies, the user may not be able to access all content on the site.

- 2. Performance cookies**

Other cookies can be used to analyze how users use the site and to monitor the performance of the site. This allows us to provide a high quality experience by adapting the offer and quickly identifying and correcting any problems that arise. For example, performance cookies can be used to keep track of which pages are most popular and to determine why some pages receive error messages.

- 3. Functionality cookies**

Functionality cookies are used to let us remember the users' preferences and tailor the website / app to provide enhanced features.

- 4. Targeted cookies**

We may use cookies to serve users' advertisements that promote Crowd1 products that are relevant to them and their interests. Please note that we do not

allow third parties to advertise their own products and services on our website / app.

5. Google Analytics

We use Google Analytics to understand how visitors use our websites and apps. This means that when you visit our site or use one of our mobile applications, your browser automatically sends certain information to Google. This includes, for example, the URL of the page you are visiting and your IP address. You can find details on how Google technology collects and processes data by following this link <https://www.google.com/policies/privacy/partners/>.

If you do not want Google Analytics to be used in your browser, you can install the Google Analytics Browser Extension. You can find out more about Google Analytics and Google's privacy policy [here](#).

Users are always free to reject cookies if their browser allows, although doing so may interfere with their use of the site. Please see detailed information on how to disable cookies here (<http://www.allaboutcookies.org/manage-cookies/>).

Further details on how companies use cookies can be found here (<http://www.allaboutcookies.org/>).

SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used. These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

SECURITY

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

LINKS TO OTHER SITES

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

CHILDREN'S PRIVACY

Our Service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from children under 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Information, please contact us. If we discover that a Child under 18 has provided us with Personal Information, we will delete such information from our servers immediately.

JUDICIAL COMPLIANCE

To ensure compliance with applicable laws and protection of the Company's legitimate business interests and legal rights, including, but not limited to, use in connection with legal claims, compliance, legislative, tax and investigative purposes (including disclosure of such information in connection with litigation or litigation).

CONSENT TO COMPANY AND SPONSOR COMMUNICATIONS

COMPANY COMMUNICATIONS:

Subject to the following, the Company will send you direct marketing related to the Company's products and services similar to those you have already purchased, or other products and services provided by the Company, its subsidiaries and carefully selected partners.

This will only be sent where you have given your consent to the Company during the registration process as an Independent Representative or through your online account on the Website ("bank-office"), or (where permitted) you have been given the opportunity to opt out.

You will be able to opt out of direct marketing by: (i) following the instructions in the communication itself; (ii) change your marketing preferences through your online account on the Website ("back-office"); or (iii) to contact support@crowd1.com.

SPONSOR COMMUNICATIONS:

Subject to the following, your Sponsors may send you direct marketing related to the Company's products and services similar to those you have already purchased, or other products and services provided by the Company, its affiliates and carefully selected partners. This will only be sent where you have given your consent to your Sponsors during the registration process as an Independent Representative or through your online account on the Website ("back-office"), or (where permitted) you have been given the opportunity to opt out. You will be able to opt out of direct marketing by: (i) following the instructions in the communication itself; (ii) change your marketing preferences through your online account on the Website ("back-office"); or (iii) to contact support@crowd1.com or (iv) contact your Sponsor directly.

WHO WILL WE SHARE YOUR PERSONAL INFORMATION WITH AND WHERE?

The Company will share your personal information with its employees, directors, and owners located in Europe, Africa, North America and Asia.

The Company and your Sponsors can each share your personal information with:

1. Authorities and / or law enforcement officials if required for the above purposes, if required by law or if necessary, for the legal protection of its own legitimate interests in accordance with applicable laws
2. Third-party service providers and group companies, who will process them on behalf of the Company or your Sponsors for the above purposes. Such third parties include, but are not limited to, couriers for delivery of your orders (located in the EEA), customer service businesses (located in the EEA) and marketers (located in the EEA), etc.
3. Among the Sponsors themselves (remember that this only means your Sponsor along with your Sponsor's upline sponsors in the consulting network)

CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

YOUR USE OF OUR SITE MEANS THAT YOU ACCEPT THE PRACTICES SET FORTH IN THIS POLICY. YOUR CONTINUED USE INDICATES YOUR AGREEMENT TO THE CHANGES.

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