

# **PRIVACY POLICY**

## **1. INTRODUCTION**

WE, VERNAM GROUP LTD., (hereinafter „we“, „us“, „our“, „the company“ in reference to Vernam Group Ltd.) HIGHLY VALUE THE IMPORTANCE OF YOUR PERSONAL DATA AND TRY OUR BEST TO PROTECT IT BY PROCESSING THE DATA LAWFULLY, IN A TRANSPARENT MANNER AND FAIRLY. THE PRIVACY POLICY IS APPLICABLE FOR ANY INFORMATION CONCERNING AN IDENTIFIED OR IDENTIFIABLE NATURAL PERSON. WE PROCESS PERSONAL DATA ONLY AFTER THE EXPLICIT CONSENT GIVEN BY USERS WHEN SIGNING UP ON OUR WEBSITE. YOUR CONSENT SHOULD BE GIVEN FREELY AND AFTER BEING FULLY INFORMED ABOUT THE TERMS AND CONDITIONS UNDER WHICH THIS WEBSITE PROCESSES PERSONAL DATA. THE ACCESS TO THE WEBSITE IS SUBJECT TO ACCEPTANCE TO THE FOLLOWING PRIVACY POLICY. IF YOU DO NOT AGREE TO THE PRIVACY POLICY, CLICK ON THE "X" BUTTON AND DO NOT USE THE WEBSITE. WE CONSIDER TICKING A BOX WHEN VISITING THE INTERNET WEBSITE A GIVEN CONSENT. ONCE YOU AGREE TO THE PRIVACY POLICY, WE CONSIDER THIS AN EXPLICIT CONSENT AND ACCEPTANCE TO THE FOLLOWING.

PRIVACY POLICY APPLIES EXCLUSIVELY TO THIS WEBSITE- <http://vernam.io/> .

THE PROCESSING OF PERSONAL DATA IS NECESSARY FOR THE PURPOSES OF THE LEGITIMATE INTEREST PURSUED BY US IN REFERENCE TO THE RELATIONSHIP BETWEEN THE CLIENT (USER) AND US.

THIS PRIVACY POLICY IS APPLICABLE SOLELY IN REFERENCE TO OUR ROLE AS DATA CONTROLLER.

THE COMPANY DOES NOT PROVIDE SERVICES THAT CAN BE USED WITHOUT IDENTIFYING THE PERSON PARTICIPATING IN A TRANSACTION AND WITHOUT VERIFYING THE SUBMITTED INFORMATION.

The privacy policy is inevitably connected to any other agreement or policy represented on Our website.

## **2. DEFINITIONS**

For the purposes of this Privacy Policy, the terms have the following meaning:

- 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

- 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- 'recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the 4.5.2016 EN Official Journal of the European Union L 119/33 framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- 'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- 'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- 'token' means a digital asset, used to describe a unit of value in reference to a currency amount (e.g. 1VRN = 0.051-0.085 USD; 1VRN=N/A ETH\*; 1VRN= N/A BTC\*).
- 'token sale event' (TSE) means a tool used in digital economies including the trade of crypto currencies on the stock market;

### **3. CONSENT**

The subject of personal data collection has the right to withdraw his or her consent at any time during the use of the website provided the purpose of the collection of data is not a contract. We consider lawful the previous processing of the personal data upon consent given before.

The User understands and agrees that the following information is provided for the possibility to request a call from our team to find why you should contribute to our token event and to get informed about the functioning and main idea of the Vernam project from one of our representatives or the information is provided for the purposes of the contract:

- Name
- Country Code
- Telephone
- Email

### **4. CONTROLLER INFORMATION**

- Vernam Group Ltd ("The Company"), Bulgarian based company, with reg. No 205007770, represented by Veselina Yordanova Georgieva and Dimitar Ivanov Mitrev together, in his capacity as legal representatives;
- CONTACT DETAILS:

**Address and registered office:** 1618, ul. "Okolovrasten pat" 3, 1756 Sofia, Bulgaria (MM Group building)

**Websites:** <https://www.vernam.com/> and <https://dashboard.vernam.com>

**Telephone number:** +35924722633

## **5. DATA COLLECTION**

We shall be entitled to collect, use, operate and transfer your personal data once you have given us your consent by ticking the box with the following text next to the form: „You agree to give us identifiable personal data including name, email and telephone, in order for the Vernam team to have the possibility to contact You in connection to giving you instructions and information about the Token Sale and the Vernam project or in reference to the contract interaction between You and Vernam“.

We shall be entitled to freely use, operate and transfer your personal data after the given consent by abiding the applicable laws and regulations.

Our servers in reference to data processing are AWS Aurora, developed and supported by Amazon Company.

In addition, detailed information on the activity of the company, as well as on the purpose and nature of the business relationship to be established shall be requested, if necessary. In case of slightest suspicion, the client or the representative shall be questioned based on collected data over the phone. If correspondence with the person was carried out via a computer network, IP address of the computer used by the person will be recorded on every contact.

## **5. TIME PERIOD FOR PERSONAL DATA STORAGE**

The period for which the personal data will be stored after the termination of the contract is 5 years due to the general time barring expiry for claims in connection to contracts, according to article 110 of the Bulgarian Obligations and Contracts Acts in connection to button „BUY TOKENS NOW“. In connection to the „REQUEST A CALL“ button, the information is collected solely for the purpose of the call. After this period, the personal data are permanently deleted and can no longer be used by us. The data are collected only for the period of time necessary for the purposes of the law. The information may be provided before the bank institutions or other legitimate state institutions.

## **6. RIGHTS OF USERS**

The User has the right to:

- Request from us access to, the correction of or the erasure of any collected personal data. The information may include only the subject of personal data collection;
- Have his or her personal data concerning him or her rectified;
- Receive a copy of his or her personal data in electronic format;
- “The right to be forgotten”- the data subject has the right to request the deletion of his or her personal data at any time where the retention of such data infringes relevant legislation;
- Receive information from Us about Our activities in connection to his or her personal data, including the purposes of collection and storage, the period of time for storage, the methods of collecting, the presence of automated processing;
- Receive his or her data and transfer them to another administrator;

## **7. THE RIGHT TO BE FORGOTTEN**

In case the person wants to exercise his or her right to be forgotten, he has to contact the technical team ([support@vernarn.com](mailto:support@vernarn.com)) and after the request, the company deletes the information within 7 days.

## **8. PERSONAL DATA DISCLOSURE**

### **8.1. DISCLOSURE TO THIRD PARTIES**

We do not sell, exchange, trade or transfer in any way personally identifiable information to third parties before sending a detailed prior notice to Users. This does not imply for partners of the Company who assist or maintain in any way the operating of our website. The disclosure of personally identifiable information shall be disclosed in this case only after receiving guarantees for confidentiality. We may disclose information for the purposes of applicable law and protection of our safety, rights and property.

### **8.2. BUSINESS TRANSITION**

Our legal entity may undergo a business transition, including merger, dissolution, acquisition, etc. This means that We may have to disclose the information You have given us to the successor, who is part of the transition.

### **8.3. DISCLOSURE TO PUBLIC AUTHORITIES**

Personal data can be disclosed by Us to Public Authorities in accordance with their legal obligation for the exercise of their official mission, such as tax and customs authorities, financial investigation units, independent administrative authorities, or financial marker authorities responsible for supervision of securities markets. They shall not be considered and treated as recipients of personal data when the personal data is necessary to carry out a particular inquiry. We shall disclose information only after request for disclosure sent by the public authorities made in writing with clear, concise and not unnecessarily disruptive to the use of the service for which it is provided.

## **9. BREACH MEASURES**

In case of personal data breach, We will undertake every possible action in an appropriate and timely manner, to avoid any material or non-material damage to the data subjects.

As soon as the controller becomes aware of the breach, Users and the competent authorities will be notified immediately. You may be asked to follow certain instructions for prevention of breaches.

## **10. FINAL PROVISIONS**

We reserve our right to modify the Privacy Policy unilaterally with the purpose of improvement of the services we offer and better protection of your personal data.

In the case of such modification, the new provisions will be announced and each User shall be duly informed. If you do not agree to the new modifications, please contact Us and request deletion of your data. Please, bear in mind that after the deletion of your data, third parties may continue to use the information made previously publicly available to them.

The new version of the Privacy Policy becomes effective from the day it is announced publicly on Our website unless stated otherwise.

