

**Incorporated in Singapore** World WI-FI PTE. LTD. Newly organized Singapore Company with registration number 201734448E, registration address: 419592,  
**(A member of a business project known as “WIFI WORLD ”)**  
**Privacy Policy**

**We Respect the Privacy of Visitors to <https://en.worldwifi.io/>**

Your (hereinafter “you,” “your,” or “User”) privacy is important to us at World WI-FI PTE. Ltd. We have developed this Privacy Policy to clearly and transparently communicate what information we collect, as well as how we collect, use, share, store and protect that information.

World WI-FI PTE. Ltd. proactively encourages each of its Users to engage in privacy best practices. World WI-FI PTE. Ltd. does its best to ensure that everyone that is part of its ecosystem is aware of those practices and has received concrete guidance and/or training concerning implementation. However, this Privacy Policy does not apply to the practices of companies that World WI-FI PTE. Ltd. does not own or control, including any third-party products or services that are integrated with the Services, or to individuals that World WI-FI PTE. Ltd. does not employ or manage.

(1) **Notice.** When World WI-FI PTE. Ltd. collects your personal information, we give you timely and appropriate notice describing what personal information we are collecting, how we will use it and the types of third parties with whom we may share it. This notice is located in this policy.

(2) **Choice.** World WI-FI PTE. Ltd. will give you choices about the ways we use and share your personal information, and we will respect the choices you make.

(3) **Relevance.** World WI-FI PTE. Ltd. will collect only as much personal information as is required to meet the specific, identified purposes of the Services it is effectuating, and we will not use it for other purposes without obtaining your consent.

(4) **Retention.** World WI-FI PTE. Ltd. will keep your personal information only as long as we need it for the purposes for which we collect it, or as permitted by law.

(5) **Accuracy.** World WI-FI PTE. Ltd. will take appropriate steps to make sure your personal information in our records is accurate, as much as is within the power of World WI-FI PTE. Ltd.

(6) **Access.** World WI-FI PTE. Ltd. will provide ways for you to access your personal information as quickly as possible upon request, as required by law, so you can correct inaccuracies. Please use the address below to request access to your information.

(7) **Security.** World WI-FI PTE. Ltd. will take appropriate physical, technical and organizational measures to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction. World WI-FI PTE. Ltd. uses the highest industry standards with respect to storage of data and the security of its system.

(8) **Sharing.** Except as described herein, World WI-FI PTE. Ltd. will not share your personal information with third parties without your consent.

(9) **International Transfer.** If World WI-FI PTE. Ltd. is used to transfer your personal information to another country, World WI-FI PTE. Ltd. will take appropriate measures to protect your privacy and the personal information transferred.

(10) **Enforcement.** World WI-FI PTE. Ltd. will regularly review how we are meeting these privacy promises, and we provide an independent way to resolve complaints about our privacy practices (see immediately below).

## **TYPE OF INFORMATION WE COLLECT AND HOW WE COLLECT INFORMATION**

### **Your Identifiable Information.**

Through this Website and the associated Services, we may collect information that can identify you (“Identifiable Information”) when it is voluntarily submitted to us. You may submit information, such as your email address, through the Website by clicking the subscribe button.

### **Your Private Key.**

The Account you create through the Widget, powered by WIFI team , is browser-based. The User's private key is encrypted as well as decrypted but only in the browser, and the decrypted version is never transferred to the server. None of the exchange operators have any access to your keys or Funds. Each User Account is implemented via a smart contract and has unique functionalities, including:

- the ability to replace User key in case of loss; and your Account address never changes.
- As part of the signup process, you will receive an email with a copy of your encrypted private key.
- If you are in need of restoring your key, the instructions for decrypting a copy of the private key
- information and other related information as securely as possible.

### **Usage Information.**

World WI-FI PTE. Ltd. may also collect certain types of usage information when you visit our Website and use the Widget, such as information about your device and its software, including, but not limited to the User's:

- IP Address;
- Browser Type;
- Internet service provider;
- Platform type;
- Device identifier;
- Device type and manufacturer;
- Operating system;
- Browser settings;
- Language preference;
- Browser version;
- Location information;
- Other device settings;
- Previous webpage visited;

- Length of visit and usage;
- Navigate of Website;
- Number of clicks;
- Frequency of clicks and visits;
- Date and time stamps of activity on the Website or Widget; and
- Any other technological usage information.

Additionally, when you use the Services, World WI-FI PTE. Ltd. may collect information about your Transaction and/or other activities on our Website for fraud prevention purposes, to monitor for possible breaches of the User's Account, and to identify any malicious software or other activity that may harm World WI-FI PTE. Ltd., our third-party providers or other Users. The number of ICO Tokens you purchase will be collected and will be provided to World WI-FI PTE. Ltd. Data about your use of our Website or Services may be collected, from which personal information has been removed.

We or our third-party partners may also use cookies, web beacons, or other technologies to collect and store other information about your visit to, or use of the Services, including, but not limited to, your duration or specific links you click on. We may later associate the usage and other information we collect online with personal information about you.

Further, any information a User discloses to World WI-FI PTE. Ltd. or a third-party provider's Support team, such as Support, may be collected. If you encounter a crash or error while using our Services, a crash report may be generated that includes, technical usage, and if you are logged in, your Account information so that we can diagnose and potentially prevent the problem in the future. Third-party tools are used to collect this information.

#### **Accredited Investor Information.**

We or our third-party providers may ask your permission before collecting certain information, such as precise geo-location information.

In order for a User to purchase SAFT Offerings, the User will need to be verified as an Accredited Investor. For the United States Accredited Investor verification process, a User's Identifiable Information may also include income-based information, net worth based information, or information from a third-party representative. If the User is an Accredited Investor based on income then the User's Identifiable Information will also include:

- The User's W-2 Form, Form 1099, Schedule K-1, or Filed Form 1040; and
- A written representation from the User that he or she has a reasonable expectation of reaching the income level in the current year.
- If the User is an Accredited Investor based on net worth then the User's Identifiable Information will also include:
  - Bank statements;
  - Brokerage statements; and
  - Other statements of securities holdings, certificates of deposit and/or tax assessments and appraisal reports issued by third parties in order to verify assets.

However, if the User is an Accredited Investor based on third-party representation, then the User's Identifiable Information will also include:

- Written confirmation from a broker-dealer, a registered investment advisor, a licensed attorney or a CPA that such person has taken reasonable steps to verify that the User is an accredited investor within the prior three (3) months and determined that such User is an accredited investor.
- Additionally, any other relevant documents that a User provides to prove Accredited Investor status will be included in the User's Identifiable Information.
- If the User is from Singapore, the User must provide documentation showing that they meet one of the following requirements:
  - Is an individual with net personal assets exceeding two million (\$2,000,000) SGD in value;
  - Is an individual whose income in the preceding twelve (12) months is not less than three hundred thousand (\$300,000) SGD; or
  - Is an entity with net assets exceeding ten million (\$10,000,000) SGD in value certified by the User's most recently audited balance-sheet or a balance-sheet certified by the User as a true and fair view of the state of affairs of the User as of the date of the balance-sheet, which should be dated within the preceding twelve (12) months.
- To prove that the User meets the Singapore Accredited Investor requirement, the User shall provide bank statements, securities statements, income statements, or other financial documents evidencing the necessary requirement. All the information the User submits to show they meet the Singapore requirement will be included in the User's Identifiable Information that is collected and retained.

### **Foreign Account Tax Compliance Act and Common Reporting Standards (FATCA/CRS).**

In order to comply with the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standards (CRS), Users will need to provide the information that World WI-FI PTE. Ltd. is required to collect. The information required by these forms is considered Identifiable Information, and may include the Identifiable Information mentioned above, such as the "Know Your Customer" (KYC), Anti-Money Laundering (AML), and Accreditation information; as well as other Identifiable Information, including, but not limited to, foreign tax identifying number, global intermediary identification number, entity type if applicable, government-issued documentation if applicable and/or other relevant financial documentation if necessary.

### **Non-Identifiable Information.**

Other non-identifiable information may also be automatically collected in connection with your visit to this Website. ("Non-Identifiable Information").

### **HOW WE USE COOKIES**

World WI-FI PTE. Ltd., or our service providers and other companies we work with, may deploy and use cookies, web beacons, local shared objects and other tracking

technologies to track your use of the Website and the Services, or for various other purposes, such as fraud prevention and monitoring, as well as advertising and marketing performance. These tools may detect characteristics or settings of the specific device you use to access the Website or Services. Additionally, information such as the types of Services used and the number of Users the Website or Services receive daily may be collected. The servers automatically log information about your computer, but this information is not used to identify you personally.

Cookies are small amounts of data a website can send to a visitor's web browser. They function as your computer's identification card and enables World WI-FI PTE. Ltd. to improve your experience by securely maintaining your authenticated session and preferences. Cookies may also enable us or our service providers and other companies we work with to relate your use of the Services over time to customize your experience.

A web beacon embeds a small transparent gif image in a webpage or email, and is used to help recognize Users, identify when Users access the webpage or view the email, assess traffic patterns and measure website engagement. Local shared objects may be stored on your hard drive using a media player or other software installed on your device. Local shared objects are similar to cookies in terms of their option, but may not be managed in your browser the same way and may not function as an identification card nor store any data on your device.

Most Internet browsers are set up to accept cookies automatically. You can set your browser to notify you when you receive a cookie, allowing you to decide whether or not to accept it. For some web pages requiring an authorization, cookies are not optional. Users choosing not to accept cookies or similar devices may not be able to access those webpages or the Services.

## **HOW WE USE THE INFORMATION WE COLLECT**

The primary purpose in collecting the information is to provide you with a secure and efficient experience. The information may be used for the following purposes:

- Allow Users to create and operate an Account;
- Verify a User's identity;
- Provide the Services;
- Process Transactions and send notices about your Transactions;
- Resolve disputes, collect fees, and troubleshoot problems;
- Prevent and investigate potentially prohibited or illegal activities, and/or violations of our posted Terms of Service;
- Generate statistics about how the Services are being used;
- Perform analytics concerning your use of the Services;
- Target advertising and communications;
- Deliver targeted marketing and promotional offers; and
- To meet any legal or regulatory requirements.

If you submit your email address through the Website's subscribe button, then that information will be used to send you World WI-FI PTE. Ltd. newsletters. We may also use data that we collect on an anonymous basis, such that it does not identify any individual customer, for various business purposes, where permissible under applicable laws and

regulations. Such data is used to help us understand consumer trends, needs, interests, and preferences so we can improve our Services.

### **Interacting With You.**

Your Identifiable Information will be used to communicate with you, manage your Account, respond to requests or complaints you may submit and for the sole purpose of your participation at the Website and use of the Personal Account.

### **WHEN WE DISCLOSE YOUR INFORMATION TO OTHERS**

Except to the extent required by applicable law or governmental or judicial body, World WI-FI PTE. Ltd. will not disclose your Identifiable Information to any third-party other than to a regulator, our affiliates, a third-party service provider, a third-party verification provider, a partner, a vendor, an affiliated third-party, or representative to whom we are required to disclose such information to in order for them to assist us in providing our Services to you.

To achieve the purposes described herein, World WI-FI PTE. Ltd. employs the services of individuals and companies, such as those described above, to perform tasks on our behalf. Our agents and those individuals and companies noted above, do not have any right to use your Identifiable Information we share with them beyond what we authorize or beyond what is necessary to assist us in providing the Services to you as described in this Privacy Policy. Any third-party which receives or has access to your Identifiable Information shall be required by us to protect such information.

### **MARKETING AND PROMOTIONAL COMMUNICATION**

If you wish to receive targeted and relevant promotional communication, you have the option to “opt-in” to this service when creating an Account.

Additionally, by clicking the subscribe button on World WI-FI PTE. Ltd.’s Website and submitting your email address to World WI-FI PTE. Ltd., you consent to receiving World WI-FI PTE. Ltd.’s newsletters. If you change your mind and no longer want to receive World WI-FI PTE. Ltd. newsletters, you may unsubscribe by following the instructions at the bottom of the email.

### **HOW WE STORE AND PROTECT INFORMATION WE COLLECT**

World WI-FI PTE. Ltd. will take reasonable precautions, as well as physical, technical, and organizational measures in accordance with industry standards, as described herein, to protect your Identifiable Information from loss, misuse, unauthorized access, disclosure, alteration, or destruction.

### **CONTACT WORLD WI-FI PTE. LTD.**

If you have questions, comments, or concerns regarding this Privacy Policy, please contact us at the following email address [eo@worldwifi.io](mailto:eo@worldwifi.io)  
Please include the following information in your request:

- 1) Your Name;

- 2) Your contact information, including phone number, mailing address, and email address;
- and 3) The precise nature of your request, inquiry, or complaint.

## **WORLD WI-FI PTE. LTD.'S POLICY FOR DATA TRANSFER FROM THE EUROPEAN UNION**

Some of our Users' use of the World WI-FI PTE. Ltd. system may require a cross-border transfer of personal information. World WI-FI PTE. Ltd. is already committed to adhering to the principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability in accordance with the requirements of the laws of the European Union.

### **Definitions**

"Personal Information" or "Information" means any information or set of information that (1) is transferred from the EU to another country; (2) is recorded in any form or medium; (3) is about, or pertains to a specific individual; and (4) that identifies, or can be used to identify, a specific individual.

"Sensitive Personal Information" means Personal Information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information that concerns health or sex life. In this privacy policy, all references to Personal Information include Sensitive Personal Information.

**Data Security.** World WI-FI PTE. Ltd. shall take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. World WI-FI PTE. Ltd. has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or destruction.

World WI-FI PTE. Ltd. has a continued commitment to create and maintain the most stringent controls needed to ensure the highest quality and security of Services provided to its Users. World WI-FI PTE. Ltd. cannot guarantee the security of Information on or transmitted via the Internet.

### **Data Integrity.**

World WI-FI PTE. Ltd. shall only process Personal Information in a way that is compatible with and relevant to the purposes for which it was collected or authorized by the individual. To the extent necessary for this purpose, World WI-FI PTE. Ltd. shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

## **Access.**

An individual has the right to obtain World WI-FI PTE. Ltd.'s confirmation as to whether we maintain Personal Information relating to you. Upon request, World WI-FI PTE. Ltd. shall allow an individual access to his or her Personal Information and allow the individual to correct, amend or delete inaccurate information. An individual's right to access Personal Information may be restricted in exceptional circumstances, including, but not limited to, when the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual may be violated. If World WI-FI PTE. Ltd. determines that an individual's access should be restricted in a particular instance, World WI-FI PTE. Ltd. will provide the individual with an explanation of the determination and respond to any inquiries the individual may have. To request to access, correct, or amend Personal Information, an individual may contact World WI-FI PTE. Ltd.'s Privacy Compliance at the contact information provided below.

## ***Recourse, Enforcement, and Liability.***

World WI-FI PTE. Ltd. uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the requirements of the laws of the European Union. We encourage interested persons to raise any concerns or complaints using the contact information provided below, and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information. If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the European Data Protection Authorities (EU DPAs) as an independent recourse mechanism. World WI-FI PTE. Ltd. will cooperate with the DPAs in the investigation and resolution of complaints brought by you. World WI-FI PTE. Ltd. agrees to comply with any advice given by the DPAs where the DPAs take the view that the organization needs to take specific action.

## **Amendments**

This Privacy Policy may be amended from time to time consistent with the requirements of the laws of the European Union. World WI-FI PTE. Ltd. will provide notification of such changes through the

## **Contact Information for World WI-FI PTE. Ltd.'s Privacy Compliance**

To request to access, modify, or delete Personal Information, inquire about this Privacy Policy, or file a privacy complaint, please send an email to [eo@worldwifi.io](mailto:eo@worldwifi.io)  
Please include the following information in your request:

- 1) Your Name;
- 2) Your contact information, including phone number, mailing address, and email address; and
- 3) The precise nature of your request, inquiry, or complaint.