



Halgo Privacy Policy

Effective Date: September 15, 2020 (v. 3.0.0)

Halgo Ltd is registered with the Information Commissioners Office, with registration number: ZA756587.

Our contact details

Name: Gaspard d’Hautefeuille, Data Protection Officer

Address: Halgo Ltd, 43 Reliance Wharf, 2-10 Hertford Rd, London N1 5EW

Email: dpo@halgo.io

The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics: it includes name and contact details;
- Location data;
- Customer financial information;
- Online identifiers: it includes IP addresses and cookie identifiers;
- Public Ethereum & Bitcoin wallet addresses;
- Website user stats;
- Email Marketing stats.

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You are visiting our main website <https://halgo.io>;
- You are subscribing to the Halgo newsletter;
- You are subscribing to customer onboarding news;
- You have met us in an event and want to follow-up;
- You are participating to the Jefferson Coin™ Security Token Offering;
- You are contacting the Halgo support team at contact@halgo.io;
- You are using our cryptoasset solutions.

We also receive personal information indirectly, from the following sources in the following scenarios:

- Digital Partners Network for customer financial information in the case of the investor's participation to the Security Token Offering of the Jefferson Coin™ to comply with Money Laundering Regulations;
- Coinfirm for e-AML standard reports on public Ethereum & Bitcoin wallet addresses;
- Matomo the open analytics platform for website user stats;
- SendGrid for email marketing stats.

We use the information that you have given us in order to comply with the Money Laundering Regulations and to operate normally as a cryptoasset business.

In case of required audits, we may share this information with Financial Conduct Authority, Information Commissioner's Office, Digital Partners Network, Interactive Brokers.

We may share the investor's public Ethereum & Bitcoin wallet addresses to Coinfirm in order to help us comply with the Money Laundering Regulations.

Some customer financial information may be kept by our financial advisors Evariste Quant Research and 360 Advisory LLC depending of the dealing and applicable securities laws.

We may share the subscribers' names and email addresses to SendGrid to enable a better deliverability for Email Marketing campaigns.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting dpo@halgo.io.

(b) We have a contractual obligation.

(c) We have legal obligations related to compliance and data protection.

(d) We have legitimate interests: for inactive users, we are allowed to contact you as part of a legitimate interest with you when you signed up to the site, asking you to confirm that you still want access.

How we store your personal information

Your information is securely stored in datacentres in Paris, France belonging to the following hosting provider: ONLINE S.A.S. (scaleway.com).

Following an inactivity period of 2 years:

- we keep customer financial information for 6 years;
- we keep public Ethereum & Bitcoin wallet addresses for 6 years;
- we keep other types of processed personal data for 6 years.

Unless an exemption in data protection law applies, we will then dispose your information by:

- deleting your data;
- telling anyone else we have shared your data with about the erasure;
- telling you we have shared your data with other organizations that are referenced in this privacy policy;
- taking reasonable steps to inform the people with responsibility in case of data breach.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at dpo@halgo.io if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at dpo@halgo.io.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>