

RealEstate.Exchange Privacy Policy

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Introduction

This Privacy Policy outlines **DigiShares GmbH** ("we", "our" or "the Company") practices with respect to information collected from users who access DigiShares' website at <https://realestate.exchange/> (the "**Site**"), register to or use any of the Services (as defined in our Terms and Conditions), or communicate with us in any other way (collectively: "**Users**").

We encourage Users to carefully read the Privacy Policy and use it to make informed decisions. The Privacy Policy should be read alongside our Terms and Conditions including with regard to the definitions set therein.

In this Privacy Policy you can read about:

- **What type of information we collect**
- **Legal basis for processing**
- **How we receive information**
- **How we use and with whom we share the information**
- **User rights**
- **For how long we retain the information**
- **How we safeguard the information**
- **How to contact us**

What Information we collect?

We collect two types of data and information from Users who access the Services.

The first type of information is non-identifiable information pertaining to a User(s), which may be made available or gathered via your access to the Services ("**Non-personal Information**"). We are not aware of the identity of a User from which the Non-Personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. browser type, language preference, access time, etc.) which may be collected in order to enhance the functionality of the Services. We may also collect such information on your activity on the Services (e.g. clicks, actions, etc.) as required to provide them.

The second type of information is individually identifiable information, namely information that identifies an individual or which may, with reasonable effort, identify an individual ("**Personal Information**"). Such information includes:

- **Contact information and RE.X account information:** When you register to the Services, or access the Services, or contact us for any other purpose, you may be asked to provide us or our trusted third party service providers with your full name, RE.X account username, RE.X password, email address, or phone number.
- **Information related to sale or delivery of cryptographic tokens:** When you contact us for the purpose of participating in a sale of any cryptographic tokens, or for the purpose of purchasing or receiving of such cryptographic tokens, you may also be asked to provide us or our trusted third party service providers with your digital wallet address, full home

address (country, state/province, zip code, city, street, house number), gender, date of birth, formal identification information (such as government issued identity documents, e.g. among others national identity card, Passport or passport number, driver's license, visa, or details of any of the aforementioned documents, or any other information we, in our sole discretion, may find required), images of identification documents, images of proof-of-residence (utility bills, bank/credit card statements, government-issued letters), images of yourself (selfie photos), as well as any other information we, in our sole discretion, deem necessary for our compliance with any legal or regulatory obligations, including among others any anti-money laundering (AML) or combating the financing of terrorism (CTF) laws or regulations or securities laws or regulations, Know Your Customer (KYC) or customer due diligence (CDD) or any reporting or record keeping requirements (e.g., among others, contents of KYC questionnaire and responses thereto, employment status, profession and job title or position, field of activity of employing company or own business, name of employing company or own business, URL to the website of employing company or own business, signature sample, ultimate beneficiary of purchased cryptographic tokens, etc.), or any transaction documents related to any cryptographic token delivery, including verification of qualified or accredited investor status or any other status (including, among others, proving that you do not come from a specific country which may currently, or in the future, be restricted by the Company at Company's sole discretion) under any applicable laws or regulations or under securities laws or regulations in any jurisdiction, as well as any other information you agreed to share with us or with our third party service providers.

- **Device information:** We may also collect pseudonymized (which cannot directly identify you) Personal Information from your device. Such information includes IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Services.
- **Communication information:** We may collect and keep information from your communications with us.
- **Voluntary information** which is collected from time to time (for example, through surveys) to enable us to improve our services or consider the wider needs of our users or potential users, or voluntary information that might be collected from you upon request and subject to your specific consent, for the purpose of provision of any of the Services to you.

If we associate Non-Personal Information with Personal Information, we will treat such information as Personal Information.

Information from Other Sources

We are working closely with third parties (including, for example, our business partners, sub-contractors, etc.) and may receive information about you from them to the extent permitted by applicable laws. For example, we may receive your data from third party providers who help us with the provision and maintenance of our Services, such as social networks (for example your name and user name, when you register or log-in to our Services), traffic analytics vendors, fraud prevention agencies and others. In particular, digital wallets and their providers may provide us with your digital wallet address and certain other information you choose to share with digital wallets or their providers. We may also receive your data from third party providers, which may conduct KYC, or CDD, or any other screening or AML or CTF-related procedures on our behalf. We may combine this

information with the information we have already collected from you via the Service in order to provide you with, and to and improve, our Service.

Legal Bases for Processing

The legal bases for processing depend on the Services you use and how you use them. This means we collect or process your Personal Information only where:

- It is necessary for the performance of our contractual obligations towards you and providing you with our Services.
- Subject to your consent.
- When we need to process your data to comply with a legal obligation to which we are subject.
- To protect and accomplish our legitimate interests and to comply with our legal obligations.

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR.

The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR.

In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

The Legitimate Interests Pursued by the Controller or by a Third Party

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favor of the well-being of all our employees and the shareholders.

How is The Information Used? With Whom Do We Share The Information?

We do not rent, sell, or share Users' information with third parties except as described in this Privacy Policy.

We may use the information for the following:

- Providing the Services.
- Communicating with you – If you have contacted us, for any reason, we will use your information in order to further communicate with you and handle issues raised by you.
- Conducting statistical and analytical purposes, intended to improve the Services. Providing you with the Services.
- Ensuring compliance with our terms, policies and applicable laws and regulations.

In addition to the different uses listed above, we may transfer or disclose Personal Information to our subsidiaries, affiliated companies, digital wallets or their providers, and subcontractors.

In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our trusted third party providers, who may be located in different jurisdictions across the world, for any of the following purposes:

- Providing you with the Services, including providing a personalized display of our Site;
- Storing and processing such information on our behalf;
- Performing research, technical diagnostics or analytics;
- Conducting KYC, or CDD or any other screening or AML or CTF-related procedures.
- Other identification and verification purposes.

We may also disclose information if we have good faith to believe that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable laws, regulations, legal process or governmental request; (ii) enforce our policies, including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or (vi) for the purpose of collaborating with law enforcement agencies or in case we find it necessary in order to enforce intellectual property or other legal rights.

In any case we will conclude that disclosure of Personal Information is necessary, we will only disclose that portion of the Personal Information that is required in order to satisfy the basis for disclosure. We will share the Personal Information under appropriate safeguards.

User Rights

This section addresses the specific rights applying to residents of the EU or residents of other jurisdictions that grant the below rights.

Depending on your jurisdiction, you may request to:

- a. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information.
- b. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
- c. Request rectification of your personal information that is in our control.
- d. Request erasure of your personal information.
- e. Object to the processing of personal information by us.

- f. Request to restrict processing of your personal information by us.
- g. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements under applicable laws.

If you wish to exercise any of the aforementioned rights, or receive more information, please contact us at info@realestate.exchange.

We will make an effort to reply within a reasonable timeframe. Please feel free to reach out to us at any time. If you are unsatisfied with our response, you can lodge a complaint with the applicable data protection supervisory authority.

Retention

We will retain your personal information for as long as necessary to provide the Services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. We may keep records containing user Personal Information, account opening documents, communications and anything else, if and as, required by applicable laws or regulations.

Third Party Collection of Information

Our policy only addresses the use and disclosure of information we collect from you. To the extent you disclose your information to other parties or sites throughout the internet (including through our Site) or on other networks or platforms, different rules may apply to their use of the information you disclose to them, as determined by such third parties and applicable laws or regulations governing their processing. Accordingly, we encourage you to read the terms and conditions and privacy policy of each third party that you choose to disclose information to.

This Privacy Policy does not apply to the practices of companies including but not limited to those of digital wallets or their providers that we do not own or control, or to individuals whom we do not employ or manage, including any of the third parties which we may disclose information as set forth in this Privacy Policy.

How Do We Safeguard Your Information?

We take great care in implementing and maintaining the security of the Site and your information. We employ industry standard procedures and policies to ensure the safety of the information we collect and retain, and prevent unauthorized use of any such information, and we require any third party to comply with similar security requirements, in accordance with this Privacy Policy. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those

who gain unauthorized access or abuse the Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

Transfer of Data Outside the European Economic Area ("EEA")

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

Cookies and Tracking Technologies

When you visit or access our Site we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies (collectively, "**Tracking Technologies**"). Those allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our Site, improve our Site's performance, perform analytics and customize your experience. In addition, we may merge data we have with data collected through these tracking technologies and data we may obtain from other sources and, as a result, such data may become Personal Information.

We also use a tool called "Google Analytics" to collect information about your use of the Site. Google Analytics collects information such as how often users access the Site, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Site and services. Google Analytics collects the IP address assigned to you on the date you visit Site, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#).

How to manage your cookie settings - there are various ways in which you can manage and control your cookie settings. Please remember that, by deleting or blocking cookies, some of the features of the Services may not work properly or as effectively:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)

For other browsers, please consult the documentation that your browser manufacturer provides.

Turning off third party cookies - you can turn off certain third party targeting and advertising cookies by visiting the [Network Advertising Initiative opt-out webpage](#).

Corporate Transaction

We may share information in the event of a corporate transaction (e.g. sale of a part or the whole of our business, or a merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

Minors

The Services are intended to the use of individuals over the age of majority in the territory they reside in and in the territory of their citizenship, and in any case is not intended to the use of individuals under the age of 18 ("**age of majority**"). In the event that we become aware that a user under the age of majority has shared any information, we will discard such information. If you have any reason to believe that an individual under the age of majority has shared any information with us, please contact us at: info@realestate.exchange.

Updates or Amendments to This Privacy Policy

We reserve the right to periodically amend or revise the Privacy Policy; material changes will be effective immediately upon the display of the revised Privacy policy. The last revision will be reflected in the "Last modified" section. Your continued use of the Services, following the notification of such amendments on our Site, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

How to Contact Us

If you have any questions about the Services or the information we collect about you and how we use it, you can contact us at info@realestate.exchange.

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