

blockimmo Privacy Policy

I. Preamble

A. Scope of data processing

We only process personal data of our users if this is necessary to provide a functional website as well as our contents and services. The processing of our users' personal data is normally only carried out with the user's consent. An exception applies in those cases where prior consent cannot be obtained for real reasons and the processing of the data is permitted by law.

B. Legal basis for data processing

Insofar as we obtain the consent of the data subject for the processing of personal data, art. 6 para. 1 let. a EU General Data Protection Regulation (GDPR) serves as the legal basis.

In the processing of personal data required for the performance of a contract to which the data subject is a party, art. 6 para. 1 let. b GDPR serves as the legal basis. This also applies to processing operations that are necessary to carry out pre-contractual measures.

Insofar as the processing of personal data is required to fulfil a legal obligation to which our company is subject, art. 6 para. 1 let. c GDPR serves as the legal basis.

In the event that the vital interests of the data subject or another natural person require the processing of personal data, article 6 para. 1 let. d GDPR serves as the legal basis.

If processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the first interest, art. 6 para. 1 let. f GDPR serves as the legal basis for processing.

C. Data erasure and storage data

The personal data of the person concerned will be deleted or blocked as soon as the purpose of storage ceases to apply. Furthermore, data may be stored if this has been provided for by the European or national legislator in EU regulations, laws or other provisions to which the person responsible is subject. The data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless there is a need for further storage of the data for the conclusion or fulfilment of a contract.

II. Provision of the website and creation of log files

A. Description and scope of data processing

Every time you visit our website, our system automatically collects data and information from the computer system of the calling computer. The following data is collected:

- 1) Information about the device and browser type and version used
- 2) The user's operating system
- 3) The Internet service provider of the user
- 4) The IP address of the user
- 5) Date and time of access
- 6) Websites from which the user's system reaches our website
- 7) Pages within our website accessed by the user

The data is also stored in the log files of our system. This data is not stored together with other personal data of the user.

B. Legal basis for data processing

The legal basis for the temporary storage of data and log files is art. 6 para. 1 let. f GDPR (i.e. legitimate interests pursued by our company or third parties).

C. Purpose of data processing

The temporary storage of the IP address by the system is necessary to enable the website to be delivered to the user's computer. For this the IP address of the user must remain stored for the duration of the session.

The data is stored in log files to ensure the functionality of the website. In addition, the data serves us to optimize the website and to ensure the security of our information technology systems. The data is not evaluated for marketing purposes in this context.

Our legitimate interest in data processing pursuant to art. 6 para. 1 let. f GDPR also lies in these purposes.

D. Duration of storage

The data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended.

If the data is stored in log files, this is the case after seven days at the latest. Further storage is possible. In this case, the IP addresses of the users are deleted or alienated so that the calling client can no longer be assigned.

E. Possibility of objection and elimination

The collection of data for the provision of the website and the storage of data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility of objection on the part of the user.

III. Use of cookies

A. Description and scope of data processing

Our website uses cookies. Cookies are text files that are stored in the Internet browser or by the Internet browser on the user's computer system. If a user visits a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic sequence of characters that enables a unique identification of the browser when the website is called up again.

B. Legal basis for data processing

The legal basis for the processing of personal data using cookies is art. 6 para. 1 let. f GDPR.

C. Purpose of data processing

The purpose of using technically necessary cookies is to simplify the use of websites for users. Some functions of our website cannot be offered without the use of cookies. For them it is necessary that the browser is recognized even after a page change.

We need cookies for the following applications:

- 1) Interaction with our support team
- 2) Usage of the website (statistics) by Google Analytics

The user data collected by technically necessary cookies are not used to create user profiles.

For these purposes, it is also in our legitimate interest to process personal data in accordance with art. 6 para. 1 let. f GDPR.

D. Duration of storage, possibility of objection and elimination

Cookies are stored on the user's computer and transmitted to our site. Therefore, you as a user also have full control over the use of cookies. You can deactivate or restrict the transmission of cookies by changing the settings in your Internet browser. Cookies that have already been saved can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, it may no longer be possible to use all functions of the website in full.

IV. Newsletter

A. Description and scope of data processing

You can subscribe to a free newsletter on our website. When registering for the newsletter, the data from the input mask is transmitted to us.

In addition, the following data is collected upon registration:

- 1) First name
- 2) E-mail address
- 3) IP address of the calling computer
- 4) Date and time of registration

During the registration process, your consent is obtained for the processing of the data and reference is made to this data protection declaration.

If you use our platform services (i.e. real estate investments) and provide us with your e-mail address, we may subsequently use it to send you a newsletter. In such a case, the newsletter will only send direct advertising for similar services of our own.

In connection with data processing for the dispatch of newsletters, no data is passed on to third parties. The data will be used exclusively for sending the newsletter.

B. Legal basis for data processing

The legal basis for the processing of the data after registration for the newsletter by the user is, with the user's consent, art. 6 para. 1 let. a GDPR.

The legal basis for sending the newsletter as a result of the sale of goods or services is section 7 para. 3 UWG.

C. Purpose of data processing

The collection of the user's e-mail address serves to send the newsletter.

The collection of other personal data as part of the registration process serves to prevent misuse of the services or the e-mail address used.

D. Duration of storage

The data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected. The user's e-mail address will therefore be stored for as long as the subscription to the newsletter is active.

E. Possibility of objection and elimination

The subscription to the newsletter can be cancelled by the user concerned at any time. For this purpose there is a corresponding link in every newsletter.

This also makes it possible to revoke the consent to the storage of personal data collected during the registration process.

V. Registration

A. Description and scope of data processing

On our website, we offer users the opportunity to register by providing personal data. The data is entered into an input mask and securely transmitted to us and stored. The data will not be passed on to third parties. The following data is collected during the registration process:

- 1) Civic and / or uPort user ID to access our platform
- 2) First name and last name
- 3) Address
- 4) Phone number
- 5) Wallet address
- 6) Country
- 7) Email address
- 8) Date of birth
- 9) Nationality
- 10) Passport copy
- 11) Source of funds
- 12) Photo and / or Video of identification document
- 13) Hash of agreements signed with the user's Wallet

At the time of registration, the following data is also stored:

- 1) The IP address of the user
- 2) Date and time of registration

In the course of the registration process, the user's consent to the processing of this data is obtained.

B. Legal basis for data processing

The legal basis for the processing of data is art. 6 para. 1 let. a GDPR if the user has given his consent.

If registration serves the fulfilment of a contract to which the user is a party or the implementation of pre-contractual measures, the additional legal basis for the processing of the data is art. 6 para. 1 let. b GDPR.

C. Purpose of data processing

A registration of the user is necessary for the provision of certain contents and services on our website and comply to laws and regulations (KYC / AML).

A registration of the user is necessary for the fulfilment of a contract with the user or for the implementation of pre-contractual measures and comply to laws and regulations (KYC / AML).

D. Duration of storage

The data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected.

E. Possibility of objection and elimination

As a user you have the possibility to cancel the registration at any time. You can change the data stored about you at any time.

After accessing our platform, you will be able to update your information anytime by going to your profile (edit) and update the information you want. Certain information might trigger the KYC/AML process. Should you want to delete your account, you can contact us and will do so as soon as possible.

VI. Rights of the data subject

If your personal data are processed and you are affected within the meaning of the GDPR, you have the rights according to art. 12 et seqq. GDPR vis-à-vis the person responsible, i.e.:

- Right to information
- Right to correction
- Right to limitation of processing
- Right to deletion
- Right to information
- Right to data transferability
- Right to objection
- Right to revoke the consent to the data protection declaration

blockimmo AG, October 2018