

**CREATIVE 3D WEB, PLC.  
PRIVACY POLICY**

**Version 1.0**

**Effective: 19<sup>th</sup> of October, 2018  
Last Updated: 19<sup>th</sup> of October, 2018**

BY USING OR ACCESSING THE WEBSITES, SYSTEMS OR SERVICES OF CREATIVE 3D WEB AND VIRTUAL 3D WEB (COLLECTIVELY “CREATIVE 3D WEB”) YOU SIGNIFY YOUR ACKNOWLEDGMENT AND ASSENT TO THE PRIVACY POLICY SET FORTH BELOW. IF YOU DO NOT AGREE TO THIS POLICY, PLEASE DO NOT USE CREATIVE 3D WEB WEBSITES, SYSTEMS OR SERVICES. PLEASE CHECK THIS POLICY PERIODICALLY FOR CHANGES.

Creative 3D Web, Plc., reg 131610C, address: 17 D, Tromode Estate, Carr’s Lane, Tromode, Isle of Man IM14 4RG, Virtual 3D Web (“Creative 3D Web”, “us”, “we”, “our”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of the Personal Data (defined below) that we collect from (a) users of the websites owned or operated by Creative 3D Web or its affiliates (each a “Site”), (b) software that may be downloaded to our Users’ mobile devices (and any updates thereto) (an “App”), and (c) the services and functionality available through the Sites, Apps, the Creative 3D Web Active Platform (defined below), including communication services and other product offerings of Creative 3D Web (the “Offerings”), including software and web applications offered via the Sites. For ease of reading in this Privacy Policy, such websites, products, software, services (including the Sites, Apps, and Offerings) and communication services are referred to collectively as the “Creative 3D Web Services”.

**1. User Consent.** By submitting Personal Data through the Creative 3D Web Services, you agree to the terms of this Privacy Policy and you expressly consent to the collection, use and disclosure of your Personal Data in accordance with this Privacy Policy.

**2. Changes to Privacy Policy.** This Privacy Policy may be updated from time to time for the purpose of accommodation of new technologies, industry practices and regulatory requirements or for other purposes. If we make any material changes we will notify you via Creative 3D Web Services and obtain your consent, where required by applicable law. If you object to any changes, you may close your account. You hereby acknowledge that your continued use of our Service after we publish or send a notice about our changes to Privacy Policy shall be considered as your acceptance that the collection, use and sharing of your Personal data is subject to the updated Privacy Policy thereof. We encourage you to periodically review this policy for the latest information on our privacy practices.

**3. Types of Data We Collect.** In the course of using Creative 3D Web Services, we collect two basic types of data: (i) Personal information and (ii) Anonymous information. On the basis of the personal and anonymous information we may create a third type of information, so called Aggregate information.

(A) Personal information means certain personally identifiable information that can be used to uniquely identify or contact individual (“Personal Data”). Personal data may include, but is not limited to, individual’s first and last name, postal address, e-mail address and/or telephone number;

(B) Anonymous information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual. It includes, but is not limited to individual’s computing device;

(C) Aggregate Information means information about groups or categories of individual which does not identify and cannot reasonably be used to identify an individual;

We may share Anonymous and Aggregate Information with other parties without restrictions.

- ***Information You Provide to Us:***

a) Registration Information - In order to use Creative 3D Web Services, you may be required to set up an account with Creative 3D Web (an “Account”). During this process, we may ask you for certain Personal Data to establish and use your Account, including but not limited to your first and last name, country and place of residence, gender, date of birth, e-mail address, username and password. In certain cases we may also request additional information from you for security reasons to provide specific Creative 3D Web Services. You may at any time refuse to provide the Personal Data that we request; however, this may limit our ability to provide certain Creative 3D Web Services to you.

b) Transaction Information – in the case you request information or purchase a product or service from us, whether on our sites or through our applications, you may be asked to provide identification information such as a copy of valid passport or government-issued photo identification document, if provided to Creative 3D Web, Plc, date of birth, postal and/residential address, telephone number and payment information. If you conduct transactions, for example on Creative 3D Web’s Virtual 3D Web Platform, we may collect and retain some or all of the information related to these transactions, including but not limited to transaction’s amounts, parties involved, time and manner of exchange, and their transaction circumstances, such as payment method and names or emails of third-parties accounts (Pay-Pal, Skrill etc).

c) Information you provide in public forums on our Service – our sites and applications may offer chat, forums, community environments or other tools that do not have a restricted audience. In a case you provide Personal data when you use any of these features, that Personal data may be publicly posted and otherwise disclosed without limitation as to its use by us or by a third party. If you choose to post any sensitive data (e.g. race, ethnicity, political opinions, religious beliefs, sexual life or criminal record) you acknowledge that such information are visible on your account and public forums, and that we do not have obligation to keep them private. You may request removal of your Personal Data from public forums of our sites and applications by contacting Customer Support at <http://creative3dweb.com>.

d) Information sent either one-to-one or within a limited group using our message, chat, post or similar functionality, to the extent permitted by applicable law to collect that information;

e) Content, communication and other information you provide to us, view or engage with when you use our sites and applications, our applications on third-party sites or platforms (e.g. social networking sites) or link your profile from a third-party site or platform to your registered account. We collect information related to the way you use our Services, including the types of content you view or engage with, the features you use, the actions you take, the people or accounts you interact with, and the time, frequency and duration of your activities;

f) Location information – when you visit our sites or use our applications, including but not limited to location information either provided by a mobile device or associated with your internet protocol (IP) address, to the extent permitted by applicable law;

g) Usage, viewing and technical data, including your device identifier and features, IP address, web pages you visited prior to coming to our sites, proxy server, operating system, web browser and add-ons, internet service provider on your mobile carrier, and third-party user handles associated with you, account when you visit our sites, use our applications on third-party sites or platforms, or open e-mails that we send. We use log-ins, cookies, device information and IP addresses to identify you and log your use;

h) Your marketing preferences;

i) Information you share with us in connection with surveys, contents or promotions;

j) If you provide us with feedback or contact us in terms of such as customer support inquires or other inquiries related to your account, we will collect your name and e-mail address, as well as any other content and communication included in the e-mail in order to send you a reply;

k) If you use Creative 3D Web Services on your mobile device, we may collect your phone number and unique device id number;

l) We also collect other types of Personal Data that you provide to us voluntarily, such as your operating system and version and other requested information if you contact us via e-mail regarding support for the Creative 3D Web Services;

- ***Information Collected from Business Users and Third Party Services Providers*** – We may receive Personal Data or anonymous data about you from Business Users and from Third Party Services Providers. We may add this information to the information we have already collected about you through the Creative 3D Web Services in order to improve the services that we provide;

- ***Intellectual Property Claims*** – if you notify us of an intellectual property claim, the information in your claim notice may be shared with other parties to the disagreement or third parties in our discretion and as required by law;

- ***Beta Service User*** – if you volunteer to serve as a beta participant for our pre-commercial content, we may track bug reports and individual system performance in an effort to test our technology rigorously before it is deployed;
- ***Former Customer*** – in a case that you discontinue your use of our Service, we may use your registration file in our database for use in the event that you elect to renew your use of our Service, as well as for anti-fraud and other such protective measures.

**4. How we collect your Personal Data.** Creative 3D Web will use Personal Data, to the extent permitted by applicable law, for the following purposes: (i) to facilitate your purchase a product or service and/or use of the Creative 3D Web Services; (ii) to provide content, products and services you authorize, process payments, send your e-mail or other communications about your transactions; (iii) to transfer funds associated with your use of Creative 3D Web Services; (iv) to provide, administer and improve Creative 3D Web Services; (v) to better understand your needs and interests; (vi) to personalize your experience; (vii) to provide Creative 3D Web Service announcements and communicate with you regarding Creative 3D Web Services; (viii) to provide you with further information and offers from Creative 3D Web or its affiliates, and about changes to our policies; (ix) to administer rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Creative 3D Web or its affiliates; (x) to respond to your support inquiries, intellectual property claims or other claims, complaints or inquiries; (xi) to determine your eligibility to participate in our token sales; and (xii) to comply with our legal obligations, resolve disputes with users, enforce our agreements and to protect, investigate and deter against fraudulent, harmful, unauthorized or illegal activity or for some other contractual or legal reasons; (xiii) to develop, test, evaluate, optimize or improve our products, services and operations; (xiv) to verify accounts and monitor activities within our Services to promote safety and security of our Services. We may combine the Personal Data we collect with publicly available information and information we receive from our business partners and other third parties, including Business Users and Third Party Services Providers.

***Cookies and beacons*** - Creative 3D Web collect information through technology, such as cookies to perform authentication of your account, show you accurate information, personalize your experience (including communication preferences, features and customizes content), enable and support our security features, help us detect malicious activity, conduct marketing campaigns and track their performance, and improve our services. Cookies are small string of data which often include an anonymous unique identifies that are saved by your browser or device when you access Creative 3D Web Services. We may use both session cookies and persistent cookies to identify that you've logged in to the Creative 3D Web Services and to tell us how and when you interact with Creative 3D Web Services. We may also use cookies to monitor aggregate usage and web traffic routing for Creative 3D Web Services and to customize and improve Creative 3D Web Services. Unlike persistent cookies, session cookies are deleted when you log off from Creative 3D Web Services and close your browser. Although most browsers automatically accept cookies, you can change your browser options to stop automatically accepting cookies or to prompt you before accepting cookies. Please note, however, that if you don't accept cookies, you may not be able to access all portions or features of Creative 3D Web Services. We may also employ and/or our third party providers may employ software technology called tags or web beacons (a.k.a. pixel tags or clear gifs), that help us better manage Creative 3D Web Service

content and communications by informing us what content is effective and how it is used. These beacons (or other tracking technology) may be included in or associated with e-mails or other communications that you receive from us (or our partners) in order to help us track your response and interests and to deliver you relevant content and services. For Account holders, we may link information gathered by web beacons or other tracking technology to Personal Data.

**5. Disclosure to Third Parties.** We will keep your Personal Data inside the Creative 3D Web, except in limited circumstances, as described below and as described elsewhere in this Privacy Policy:

*(a) System Users:* We may share your Personal Data with any Third Party Services Providers or Users of the System whom you have authorized to receive, access or use your Personal Data, including those Third Party Services Providers and Users who are allowed to access your Personal Data through the authorization mechanisms and settings built into the System or Creative 3D Web Services.

*(b) Our Affiliates.* We may share your Personal Data with our parent company, subsidiaries, joint ventures, or other companies under common control that we may have now or in the future, in which case we will require them to honor this Privacy Policy.

*(c) Our Service Providers.* We may employ third party companies and individuals to administer and provide Creative 3D Web Services on our behalf and to fulfill requests and orders you may make (including maintenance, administration, support, hosting and database management services and billing and credit card payment processing). These third parties may have access to your Personal Data reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

*(d) Other Disclosures.* Regardless of any choices you make regarding your Personal Data (as described below) Creative 3D Web may disclose Personal Data if it believes in good faith that such disclosure is necessary (i) in connection with any legal investigation; (ii) to comply with relevant laws or to respond to subpoenas or warrants served on Creative 3D Web; (iii) to protect or defend the rights or property of Creative 3D Web or users of the Creative 3D Web Services; and/or (iv) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use Agreement.

*(e) Corporate Transactions.* We may share some or all of your Personal Data in connection with or during negotiations of any merger, financing, acquisition or dissolution transaction or proceeding involving sole transfer, divestiture, or disclosures of all or a portion of our business or assets. In the event of an insolvency, bankruptcy or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

*(f) Specific Terms.* Specific portions or pages of our Sites or the Creative 3D Web Services may notify you of additional or different provisions relating to collection and disclosure of Personal Data. In the event of a conflict between such provisions and this Privacy Policy, such specific terms shall control.

Except as noted above, we do not share or sell the Personal Data that you provide to us with other organizations without your consent.

- ***Third Party Websites.*** The Creative 3D Web Services may contain links to third party websites. When you click on a link to any other website or location, you will leave the Creative 3D Web Services and go to another site, and another entity may collect Personal Data or anonymous data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content or to any collection of your Personal Data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content or websites.
- ***Use of Aggregate and Non-Personally Identifying Information.*** Creative 3D Web may use anonymous, aggregate or de-personalized Personal Data and/or Usage Information to create non-personally identifiable information. Creative 3D Web may freely disclose to third parties and use non-personally-identifying information for industry analysis, statistical purposes, demographic profiling, marketing and advertising, and other business purposes (which may include reporting on trends in the usage of its Apps, Sites or Creative 3D Web Services).
- ***Marketing Messages.*** If you submit your e-mail address or other contact information to us we may use this information to send you news about services, products or promotions of Creative 3D Web and its affiliates. We may use one or more affiliates or service providers to administer these messages, but we do not share your email address with spammers or any other third parties for their own use without your permission. When you receive these e-mail communications, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by logging in and changing your Account settings. Despite your indicated e-mail preferences, we may send you service-related communications, including notices of any updates to our Software User Agreement and Terms of Tokens Use (“Terms”) or Privacy Policy. We do not provide Personal Data collected by Creative 3D Web to organizations for their own direct marketing purposes.
- ***Security.*** We use appropriate security measures consistent with industry practice to protect against the loss, misuse and alteration of your Personal Data under our control. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee the absolute security of Personal Data. We will comply with all applicable privacy laws and make any legally required disclosures regarding breaches of the security, confidentiality, or integrity of Personal Data consistent with our ability to determine the scope of a breach and our obligations to law enforcement.
- ***Social Media Widgets.*** Our Site and Creative 3D Web Services may include social media features, such as the Facebook “like” button, and widgets, such as the “share this” button. These features may collect your Personal Data and track your use of Creative 3D Web Services. Your interactions with these features are governed by the privacy policy of the company providing such functionality.

- ***Children's Privacy.*** Some of the Creative 3D Web's Services are not directed towards minors, and we do not knowingly collect Personal Data in connection with those Services. We direct certain sites, products or services towards children and intend to collect their Personal Data, we will take additional steps to protect their privacy by:

- notifying parents (including guardians) about our information practices in terms of collecting Personal Data from children, including the type of Personal Data we collect from children, the users to which we may put that Personal Data and whether and with whom we may share that Personal Data;

- obtaining parental consent, where necessary under the applicable law, for the collection, disclosure or use of Personal Data from their child, or for sending information about our products and services directly to their child;

- limiting our collection of Personal Data of children to no more than is reasonably necessary to participate in online activities;

- giving parents access or the ability to request access to Personal Data collected from their children and the ability to request that such Personal Data be changed or deleted. A parent may request at any time that we cease to collect further Personal Data from their child or request that any Personal Data that we have collected be changed or deleted from our records, in accordance with applicable law, by sending an e-mail to our Customer Services Support at <https://childsafety.creative3dweb.com>.

In some instances, certain portions of our Service may allow children to submit Personal Data (such as their name and/or the child's or parent's e-mail address) without prior parent's consent. These Personal Data we may use for the purposes of: (i) obtaining parental consent and/or providing the child's parent with any information regarding their child's use of our Services, as required by law; (ii) responding directly to a specific request from the child on a one-time basis (for example in response to a customer support inquiry) or more than once (to receive a newsletter or in-game communication from us) where we will use reasonable efforts to notify the child's parent of such ongoing communication with child promptly after initial response to the child and before making any subsequent responses to the child, and provide the parent the right to refuse further contact with the child and require deletion of Personal Data about or collected from the child by contacting our Support Team; (iii) protecting the security or integrity of our Service, to take precautions against liability, to respond to judicial process or to the extent permitted under applicable law, to provide information to law enforcement agencies or for an investigation or a matter related to the public safety, to the extent reasonably necessary to do so.

- ***Your Control, Rights and Choices regarding collected Information.***

(A) Data retention - We retain your Personal Data while each of your accounts is in existence or as needed to provide you with Services and for so long as necessary to achieve the purposes described in this Privacy Policy (e.g. to comply with our legal obligations). If required by law or if the information is subject of a legal request or governmental investigation, we retain certain financial transaction information and Personal Data for as long as we are required to comply with applicable laws, regulations or such legal process or investigation. We also retain Personal Data

in order to protect our and other's rights, resolve disputes or enforce our legal terms or policies, to the extent permitted under applicable law.

(B) Right to Access and Control your Personal Data – Individuals located in certain countries, including European Economic Area, have certain statutory rights in relation to their personal data, including the rights to: (i) correct, update or delete account registration or Personal Data or to ask us to change or update those data in certain cases, particularly if it is inaccurate; (ii) ask us to stop using all or some Personal Data (e.g. if we have no legal right to keep using it) or to limit our use of it (e.g. when Personal Data is inaccurate or unlawfully held); (iii) change your choices for subscriptions, newsletters and alerts; (iv) choose whether to receive offers and promotions, or other marketing, from us for our products and services, or products and services that we think may be of interest to you, and you have a right to object to Creative 3D Web's use of your Personal Data for this purpose at any time; (v) choose whether to share Personal Data with other companies so they can send you offers and promotions about their products and services; (vi) choose whether to receive targeted advertising from many ad networks, data exchanges, marketing analytics and other service providers;

(C) Right to Access and/or Take Your Data: You may request access to the Personal Data we hold about you and you may ask for a copy of your Personal Data in machine-readable form. You may exercise your controls, rights and choices, or request access to your Personal Data, by modifying your selections on your account preferences page, following unsubscribe instructions provided in communications we send to you, or sending correspondence regarding your request(s) or the publications or services you no longer wish to receive from us to the following address:

**Creative 3D Web, Plc  
Attention: Privacy  
17D Tromode Estate,  
Tromode  
Douglas, IM4 4RG  
Isle of Man**

We will process your request in accordance with applicable laws. Please note that, for technical reasons, there is likely to be a delay in deleting your Personal Data from our systems if you ask us to delete it. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted on our sites or that we have, and that there may be circumstances in which the law does not require or allow removal even if requested. Please be aware that if you do not allow us to collect Personal Data from you, we may not be able to deliver certain products and services to you, and some of our Services may not be able to take account of your interests and preferences.

You may have the right to lodge a complaint with a competent supervisory authority, subject to applicable law.



To the extent that Creative 3D Web's processing of your Personal Data is subject to the General Data Protection Regulation (GDPR), Creative 3D Web relies on its lawful bases, described below, to process your data.

If you collect or process Personal Data of users associated with the European Economic Area on a Creative 3D Web website or create or use of programs or applications that retain information about such Creative 3D Web users or their computers, you may also have obligations under the GDPR. You should seek independent legal advice relating to your status and obligations under the GDPR. Nothing on this website is intended to provide you with, nor should it be used as a substitute for, legal advice.

(D) Account Closure – You are entitled to close your account by contacting us at [privacy@creative3dweb.com](mailto:privacy@creative3dweb.com). If you choose to close your Creative 3D Web account, we retain information for the purposes set out in this Privacy Policy, even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, respond to government investigations, maintain security, prevent fraud and abuse, enforce our Terms of Service or other terms or policies, and protect our and other's rights. We will retain Anonymous Information and Aggregate Information after your account has been closed. As we do not control data you shared with others, such data will remain visible or accessible.

- ***A Note to Users Outside of the Isle of Man and European Union*** - We operate globally and may transfer your information or Personal Data to individual companies of Creative 3D Web, Plc or third parties in locations around the world for the purposes described in this Privacy Policy. If you are located outside the European Union or other regions with laws governing data collection and use that may differ from the Isle of Man law, please note that your information may be transferred to a country or jurisdiction that does not have the same data protection laws as your jurisdiction and you consent to the: (1) transfer of information to the Isle of Man or any other country in which Creative 3D Web, Plc or its subsidiaries, affiliates or service providers maintain facilities; and (2) the use and disclosure of information about you as described in this Privacy Policy. Whenever your Personal Data is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your Personal Data in accordance with applicable law.

- ***Security of Information*** - We implement technical, physical and organizational security safeguards designed to protect your data, from loss, misuse and unauthorized access and disclosure. We regularly monitor our systems for possible vulnerabilities and attacks. However, given the nature of electronic communications and information processing technologies, we cannot guarantee the security or safety of any information that is sent to us, transmitted through the Internet or stored on our systems. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach by others of any of our physical, technical, or organizational safeguards. In the event that Personal Data is compromised due to a breach of security, Creative 3D Web, Plc will promptly notify our users in compliance with applicable law.

- ***Lawful Basis for Processing of Information*** - We will collect, use, process and store your Personal Data where we have a valid lawful basis, including one or more of the following: (i) your consent, which you may change at any time; (ii) performance of a contract (our

processing is necessary for the performance of a contract we have with you to deliver the Services you have requested, to respond to your inquiries or to take specific steps before entering into a contract with you); (iii) legal obligation (processing is necessary for Creative 3D Web, Plc to comply with laws, regulations and regulatory authorities, court orders or law enforcement requests); (iv) vital interest (processing is necessary to protect your vital interests or vital interests of another person); (v) legitimate interest (improve our business or customer relationships, marketing and advertising, resolve disputes, prevent fraud and abuse, analyze and improve safety and security of our Services, enforce our Terms of Service, to anonymize and subsequently use the information).

- ***Jurisdictional Issues.*** Creative 3D Web makes no representation that any Creative 3D Web Service operates (or is legally permitted to operate) in all geographic areas, or that the Creative 3D Web Services are appropriate or available for use in all locations. Accessing the Creative 3D Web Services from territories where the Creative 3D Web Services, or any content or functionality of the Creative 3D Web Services or portion thereof, is illegal is expressly prohibited. If you choose to access the Creative 3D Web Services, you agree and acknowledge that you do so on your own initiative and at your own risk and that you are solely responsible for compliance with all applicable laws.
- ***Contact Information:*** If you have any questions or concerns regarding this Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us by sending an e-mail to [privacy@creative3dweb.com](mailto:privacy@creative3dweb.com).