

## Data Processing Policy

### *The Controller*

1. The controller is B11G OÜ (hereinafter: B11G), a company established in Estonia and registered with the Estonian Commercial Register under no. 14514205.
2. To contact B11G please send an e-mail to [info@b11g.eu](mailto:info@b11g.eu) . Otherwise please address your correspondence to the following address:

B11G OÜ  
Lasnamäe Street 4b-38,  
Tallinn, 11412,  
Estonia

3. To contact the data protection officer of B11G, please write to [dataprotectionofficer@b11g.eu](mailto:dataprotectionofficer@b11g.eu) or to the following address:

Data Protection Officer  
B11G OÜ  
Lasnamäe Street 4b-38,  
Tallinn, 11412,  
Estonia

### *Processing of Personal Data*

4. B11G may process personal data for the purpose of
  - 4.1. performance of its contractual duties to the data subject. The basis of processing personal data is article 6(1)(b) of the [General Data Protection Regulation](#). Provision of the personal data which B11G collects about a data subject is necessary for entering into and performance of the contracts between B11G and the data subject (e.g. agreement covering the usage of this website and loan agreement in respect of loan accompanied with B11G Tokens). Certain checks carried out as part of performance of the contracts and the resulting decisions are automated (*i.e.*, whether the data subject is located in a prohibited jurisdiction); such decisions are taken by means of comparing received data with pre-set requirements.
  - 4.2. performance of its contractual duties to other persons. The basis of processing of personal data is article 6(1)(f) of the [General Data Protection Regulation](#). B11G uses service providers (*i.e.* Agrello OÜ providing Agrello ID and Agrello Digital Signature; Coinmetro OÜ providing AML/KYC procedure) to fulfil its contractual

obligations between B11G and the data subject and to fulfil legal requirements under applicable laws and regulations.

- 4.3. sending marketing materials to data subjects. The basis of processing of personal data is article 6(1)(a) of the [General Data Protection Regulation](#).
  - 4.4. compiling analytics about the use of this website. The basis of processing of personal data is article 6(1)(f) of the [General Data Protection Regulation](#).
  - 4.5. performance of due diligence measures set forth in the laws on prevention of money laundering and similar laws even if the law itself does not require performance of such measure, but market practice does (*i.e.*, if financial institutions decline to transact with B11G if such measures are not taken). The basis of processing of personal data is article 6(1)(f) of the [General Data Protection Regulation](#).
5. Other than the personal data input or shown by the data subject itself on this website, B11G
    - 5.1. may collect data about
      - 5.1.1.location (including IP address and time-zone) from which the data subject accesses this website,
      - 5.1.2.time when the data subject accesses this website and
      - 5.1.3.model of the device which the data subject uses to access this website and the device-ID, and
    - 5.2. receives data from partners or service providers to whose page the data subject is redirected in process of transacting with B11G or whose services run as plug-ins on this webpage. For instance, the providers of identification service or of digital signature or smart-contract service.
  6. B11G transfers personal data collected by it to recipients belonging to the following categories:
    - 6.1. Internet service providers,
    - 6.2. providers of servers (hosting),
    - 6.3. providers of identification services and digital signature services,
    - 6.4. providers of AML/KYC services,
    - 6.5. providers of analytics,
    - 6.6. software developers and technical support providers.
  7. Furthermore, B11G's service providers in the fields of IT and marketing who process personal data in the same servers where B11G stores personal data may have access to personal data. In addition, professional advisors (*e.g.*, attorneys, auditors) and financial institutions who are subject to duties of confidentiality may gain access to such data when providing services to B11G.

8. B11G may make certain decisions about data subjects solely by automated processing, and such decisions could have legal implications for data subjects.
9. Certain information which B11G and its service providers may be able to relate to a data subject is stored on the Blockchain. However, any such information is very limited to the specifics of Blockchain based IT-systems and smart contracts.
10. B11G does not transfer personal data outside the European Union, other than storing certain data on the Blockchain. No guarantee may be given as to where in the world the relevant server is physically located. However, no data stored on the Blockchain is capable of being tied to a particular data subject by any person other than B11G and its service providers (i.e. Agrello OÜ providing Agrello ID and Agrello Digital Signature; Coinmetro OÜ providing AML/KYC procedure).
11. Without prejudice to the data subject's right to erasure, B11G stores personal data for the longer of the following periods:
  - 11.1. the period on the passing of which contractual claims from the contract between B11G and the data subject become statute-barred;
  - 11.2. the period for which B11G must keep information about the borrower under applicable laws (including applicable laws on prevention of money-laundering and financing of terrorism) where B11G is under a duty, whether contractual or not, to keep such information or where the best market practice requires it.
12. B11G may obtain biometric data about data subjects from providers of identification service (from when the data subject was identified) or from providers of digital signature or smart-contract service. In that event processing is based on article 9(2)(a) of the [General Data Protection Regulation](#).

### ***Rights of the Data Subject***

13. The data subject has the following rights:
  - 13.1. to obtain from B11G confirmation whether personal data concerning him or her is processed,
  - 13.2. where personal data concerning him or her is processed, obtain from B11G the information listed in article 15(1) of the [General Data Protection Regulation](#),
  - 13.3. to request that B11G rectify incorrect personal data pertaining to the data subject,
  - 13.4. to provide to B11G additional data so that incomplete personal data pertaining to the data subject is completed,
  - 13.5. to request that B11G delete, on conditions set forth in article 17 of the [General Data Protection Regulation](#), personal data pertaining to the data subject,

- 13.6. to request that B11G restrict processing personal data pertaining to the data subject in situations explained in article 18(1) of the [General Data Protection Regulation](#),
  - 13.7. to receive from B11G, in .csv format, the personal data which he or she has provided to B11G,
  - 13.8. to object, on conditions set forth in article 21 of the General Data Protection Regulation, to processing of his or her personal data when B11G processes the personal data for the purposes of other legitimate interests pursued by B11G,
  - 13.9. to withdraw consent for processing biometric data. Withdrawal of consent shall not affect the lawfulness of processing the data prior to the withdrawal. Please note that in that event B11G might be unable to transact with you in any way whatsoever (including by making payments) unless you come to B11G's office to be identified by a member of staff of B11G,
  - 13.10. to lodge a complaint with a supervisory authority (Andmekaitse Inspektsioon, info@aki.ee, Tatari 39, Tallinn 10134, Estonia).
14. To exercise any of the rights referred to in clause 13 (except for the right to lodge a complaint with a supervisory authority) the data subject should write to B11G using the details set forth in clause 2. B11G shall answer to the request without undue delay and in any event within one month of the receipt of the request (that period may, taking account of the circumstances, be extended by two months). The time of answering will depend on the number of requests B11G receives as well as on the content of a particular request.

### ***Cookies***

15. B11G does not use cookies.
16. However, third parties (such as the providers of analytics and identification services) may place cookies to your device.
17. Most browsers allow you to control cookies, including turn off their acceptance by your device, through their settings' preferences. However, if you turn off the ability of your device to accept such cookies, you may lose access to this website and the services provided via it.
18. Most devices also allow you to delete the cookies which have already been set into your device. Browser manufacturers provide help pages relating to cookie management in their products.
  - 18.1. [Chrome](#)
  - 18.2. [Microsoft Edge](#)
  - 18.3. [Internet Explorer](#)

18.4.[Firefox](#)

18.5.[Safari](#)

18.6.[Opera](#)

19. If you access this website without changing your browser settings, B11G will assume that you agree to receive the cookies which third parties place into your device when you use this website.