

PRIVACY NOTICE

Updated: July 21, 2020

OTON, <http://oton.org>, is an internet community supported and controlled by the company PLAZMA PREMIER LTD.

PLAZMA PREMIER LTD. (hereinafter referred to as the “**Company**”, “**We**”, “**Our**”, “**Us**”) is a company registered under the laws of the Republic of Seychelles on 29 April 2016 with company registration number 182399 and a registered office at Suite 3, 1st Floor, La Ciotat Building, Mont Fleuri, Mahe, Seychelles.

OTON respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our Website (regardless of where you visit it from) and inform you about your privacy rights and how the law protects you.

This document is written in English. To the extent that any translated version of this document conflicts with this English version, this English version shall prevail.

Please also use the Glossary to understand the meaning of some terms used in this privacy notice.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how OTON collects and processes your personal data through your use of this Website, including any data you may provide through this Website when you create an OTON Account.

This Website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

PLAZMA PREMIER LTD. is the company responsible for collection of your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us by privacy@oton.org

You have the right to make a complaint at any time to the applicable supervisory authority for data protection issues in your jurisdiction. Before you approach the supervisory authority please contact us in the first instance.

Changes to the Privacy Notice and changes in your personal data

Occasionally, at our sole discretion, we may change this Privacy Notice, so we will kindly ask you to regularly check this page to ensure that you are aware of any changes. We will be posting such changes on this page and update the Privacy notice modification date at the top of this page. In case of significant changes to this Privacy notice, we would inform you separately of the relevant changes.

It is very important to keep your personal data provided at our Website accurate and valid. In case of any changes in your personal data please update your information on our Website and immediately inform us on such changes.

Third-party links

This Website may include links to the third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

We strive to protect personal data and apply high standards when it comes to privacy issues. We ensure that our employees are provided with the appropriate training in order to handle personal data promptly and in accordance with the laws. Furthermore, we endeavor to ensure that any parties with whom we co-operate apply the same high standards as we do when it comes to data protection and privacy.

2. The data we collect about you

Personal data, or personal information, means any information about an individual that can be directly identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Contact Details** including first name, maiden name, last name, username or similar identifier, email, telephone number, address.
- Information required by the company to meet legal and regulatory requirements, such as **identification documents** (ID, Passport) and documents with **proof of address** (i.e. Utility bills)

- **Photographic images** and/or video of yourself during identity verification process.
- **Financial Data** includes BTC address.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website.
- **Profile Data** includes your username and password, purchases or orders made by you.
- **Usage Data** includes information about how you use our Website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data according to the law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

When we need to collect your personal data according to the requirements of the law, or under our Terms of Use and you fail to provide such data when requested, we may not be able to provide you with the access to our Website as well as to your OTON Account. In this case, we may have to limit your access to our Website as well as to your OTON Account, but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your data by filling in forms or by corresponding with

us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an OTON Account;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we provide you the access to our Website as well as Community Educational Programs.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not prevail over those interests.
- Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use your personal data, and legal grounds we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Legal grounds for processing including grounds for legitimate interest
To register you as a new Candidate for Community Members	(a) Identity (b) Contact (c) Financial (d) Photographic/Video	(a) Access to Community Educational Programs (b) Contract (c) Data subjects' consent

<p>To process and deliver your order including:</p> <p>(a) Manage payments</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications</p>	<p>(a) Data subjects' consent (b) Contractual obligation</p>
<p>To manage our relationship with you which will include:</p> <p>(1) Notifying you about changes to our Terms of Use or (2) Terms of Participation in the Community Distribution Program or Marketing Plan or Privacy Policy (3) Asking you to leave a review or take a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications</p>	<p>(a) Compliance with a legal obligation (b) Data subjects' consent</p>
<p>To administrate and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Legitimate interests</p>
<p>To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>(a) Data subjects' consent (b) Contract</p>

<p>To use data analytics to improve our Website, Community Educational Programs and other products/services, marketing, users and Community Members relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>(a) Data subjects' consent</p>
<p>To make suggestions and recommendations to you about products or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>(a) Data subjects' consent (b) Contract</p>

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant to you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased Community Educational Programs as well as other products/services and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will not share your personal data with any company outside OTON for marketing purposes.

Opting out

You have the right to refuse receiving marketing messages at any time (Opt-out). Where you opt out of receiving these marketing messages, this will not apply to personal data provided to

us as a result of a Community Educational Programs purchase or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We use third party service providers to store and process personal data in certain ways which are useful for the purposes of our services, such as Digital Ocean and mailchimp.com, which allow us to host the website, send you newsletters and company updates.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Link accounts to certain third parties services

You can link your OTON account to certain third party services. In order to do so, you may be required to log to our site. After you complete this login process, we will receive a token that allows us to access your account on third party service so that we can send your certain data if you allow such sharing and only when you ask us to. We do not receive or store or transfer your passwords for and to your third party service accounts.

Please note that these third party services fall outside of this privacy notice and we have no control over the data they collect. We encourage you to read privacy notices of such third party services before using them.

7. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition,

we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

According to the law we have to keep basic information about Community Members as stated in our Website's Terms of Use (including Contact, Identity, Financial and Transaction Data) for five years after they cease being Community Members or from the date of transaction on our Website to fulfil obligations prescribed by anti-money laundering laws.

You have the right to request us to delete your personal information by sending an email to privacy@oton.org. We will immediately delete such information in case there are no other legal, accounting, or reporting obligations that we need to comply with.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in this case we may use such information indefinitely without further notice to you.

10. Your legal rights

Under certain circumstances, you have the rights under data protection laws in relation to your personal data. Please review the Glossary at the end of this policy to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*

- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us by privacy@oton.org.

11. Glossary

LEGAL GROUNDS

Legitimate Interest means, following your registration on the OTON Website, the interest to create, promote and develop an online platform of mass online education using advanced technologies in order to obtain and share knowledge, goods and services between individuals and organisations around the world. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by the law).

Access to Community Educational Programs means processing your data where it is necessary to give you an access to Community Educational Programs or to take steps at your request before being given access to Community Educational Programs.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

1. **Request an access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
2. **Request a correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
3. **Request an erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to restrict the processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with the local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

4. **Restrict the processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to restrict the processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to restrict the processing when we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
5. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
6. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
7. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.