

# PRIVACY AND POLICY

## 1. INFORMATION WE COLLECT

### PERSONAL INFORMATION

When you register for the Buy Token, we may collect information that personally identifies you, such as your name, address, mobile telephone number, e-mail addresses, and other information that you provide to us (“Personal Information”). You may be asked to provide us with certain Personal Information when you register. The decision to provide this information is voluntary. However, if you choose not to provide the requested information, you may be denied to purchase the requested VCC.

### DATA USAGE

We automatically collect usage information that allows us to collect information regarding how users access and use the account (“Usage Data”). For example, when you decide to purchase VCC, we automatically collect information on the type of device you use and the device identifier (or “UDID”). Additionally, each time you login, we automatically collect information regarding the type of web browser you use, your operating system, your Internet Service Provider, your IP address, the pages you view on our website, the time and duration of your visits, crash logs and other information relating to your use of the website. We use this information to analyze trends, administer the activities, troubleshoot any user problems, and enhance and update the performance.

### COOKIES

Like many other websites, we use cookies on our website (a small removable data file that is stored by the web browser on your computer that identifies your computer and browser when you visit our site). We do not use cookies to collect Personal Information but rather to improve the quality of the site. Most web browsers are initially set up to accept cookies. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. **THE SITE’S COOKIES DO NOT AND CANNOT INFILTRATE A USER’S HARD DRIVE TO COLLECT ANY INFORMATION STORED ON THE HARD DRIVE.**

## 2. HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect for internal purposes only. We do not sell or rent information about you. We will not disclose Personal Information to third parties without your consent. We use Usage Data only to monitor and improve performance. For example, we use Google Analytics to help analyze how users use the site. Google Analytics uses cookies to collect information such as how often users visit the site, what pages they visit, and what other sites they used prior to coming to the website. We use the information we get from Google Analytics only to improve our service. Google Analytics collects only the IP address assigned to you on the date you visit the site, rather than your name or other personally-identifying information. We do not combine the information generated through the use of Google Analytics with your Personal Information. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique member the next time you visit the website, the Cookie cannot be used by anyone but Google. 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.

## 3. PROTECTION OF INFORMATIONS

### SECURITY

Victorum is committed to protecting the security of your information. We employ industry-best security measures designed to protect your information from unauthorized access. Regardless of our efforts, no data transmission over the Internet or other network, including any of the activities, can be guaranteed to be 100% secure. Accordingly, we cannot and do not guarantee the absolute security of any information you transmit on or through the website, and any information you transmit is sent at your own risk.

## COMPLIANCE WITH LAWS AND LAW ENFORCEMENT

**Victorum** cooperates with government and law enforcement officials to enforce and comply with the law. We may therefore disclose Personal Information and Usage Data and any other information about you if we deem that it is reasonably necessary to:

- a) satisfy any applicable law, regulation, legal process (such as a subpoena or court order), or enforceable governmental request;
- b) enforce the Terms of Use, including investigation of potential violations thereof;
- c) detect, prevent, or otherwise address fraud, security, or technical issues; or
- d) protect against harm to the rights, property, or safety of **Victorum**, its users, or the public as required or permitted by law.

## 4. MISCELLANEOUS

### POLICY TOWARDS MINORS

Victorum (VCC) may not be used by anyone under 18. We do not knowingly collect information on anyone under the age of 18. If you are under the age of 18 you are not eligible to use or buy VCC.

### ACCURACY

You can always review, correct, update, or change your Personal Information. Upon your request, we will:

- 1) correct, update or change your Personal Information;
- 2) stop sending you messages if you wish to opt-out of our direct marketing efforts; and/or
- 3) disable your account to prevent any future activity through that account.

You may make any of these requests by emailing the request to [support@victorumcoin.com](mailto:support@victorumcoin.com). Please do not email any sensitive information.

### RETENTION

We retain information only for so long as it continues to help us monitor or improve the activity performance. The exact length depends on the type of information collected and processed. When Personal Information or Usage Data is no longer needed it will be automatically deleted or anonymized.

### COMPLIANCE WITH GDPR

To the extent required by law, Victorium complies with the EU General Data Protection Regulation (GDPR). GDPR gives users the following rights:

1. Right of erasure (Right to be forgotten);
2. Right of rectification;
3. Right to be informed;
4. Right of access;
5. Right to restrict processing;
6. Right to data portability;
7. Right to object;
8. Right not to be subject to automated decision making; and
9. Right to complain to a supervisory authority

### LINKS TO OTHER SITES

Please be aware that the website may contain links to other sites that are not governed by this Privacy Policy. Victorium is not responsible for the content or practices of these sites. We encourage you to review the privacy policy of each site visited before disclosing any personal information.

### CHANGES TO THE PRIVACY POLICY

We may periodically change this Privacy Policy. If we decide to change this Privacy Policy, we will inform you by posting the revised Privacy Policy on the Site. Those changes become effective upon posting on our site, the date of which is shown as the "Revised On" date in the revised Privacy Policy. The use of the information we collect now is subject to the Privacy Policy in effect at the time such information is collected. By continuing to use our website, you agree to be bound by the revised Privacy Policy.