

GG WORLD LOTTERY ICO PRIVACY POLICY

1. PRIVACY POLICY STATUS AND ACCEPTANCE

- 1.1. This Privacy Policy (hereinafter referred to as the “Policy”) sets forth the general rules of User’s Personal Data collection, processing, distribution, use and keeping by the Company during the Website use and/or GGCOIN Token Sale and/or directly on our request.
- 1.2. Each User must carefully read and comply with this Policy.
It is understood and presumed per se that by the fact of the Website use and GGCOIN Tokens purchase during the GG World Lottery Token Sale or otherwise or by providing Us the Personal Data directly on our request, the respective User fully read, understood and accepted this Policy. If any User does not agree with this Policy in general or any part of it, such User must not access and use the Website and/or purchase GG World Lottery Tokens.
- 1.3. The Company reserves the right to modify or amend this Policy at its sole discretion. Any revisions to this Privacy Policy will be posted on the homepage of our Website. If we make changes, we will notify you by revising the date at the top of this Policy. In addition, if the revised version includes any substantial changes to the manner in which your personal information will be processed, we will provide you with prior notice by posting notification of the change on the Privacy Policy area of our Website. We strongly recommend You to periodically visit the Website to review any changes that may be made to this Privacy Policy to stay informed about our information practices and your privacy rights and choices. Your continued usage of the Website and/or Token Sale Platform shall mean Your acceptance of those amendments.
- 1.4. In terms of the GGCOIN Token Sale this Policy shall be considered as inalienable part of the GGCOIN Token Sale Agreement. In terms not regulated by this Policy, the GGCOIN Token Sale Agreement shall apply to the relationships that arise hereunder.
- 1.5. It is the personal obligation and responsibility of each Employee to act in a manner consistent with this Policy.
- 1.6. All Employees must report any breaches, violations, risks, incidents and complaints, as appropriate.

2. DEFINITIONS

- 2.1. **Applicable Law** – laws of the British Virgin Islands (hereinafter – the BVI) applicable under this Policy to any and all relations between a User and Company.
- 2.2. **Authorized User** – User of the Token Sale Platform who is not a citizen, permanent resident and does not have a permanent domicile in the Restricted Countries or Prohibited Countries that was established during the verification. Only Authorized Users are eligible to participate in the Public Token Sale. For more information on Restricted and Prohibited Countries please see the GGCOIN Token Sale Agreement, which can be accessed on the project’s Website.
- 2.3. **Employee** – a GG International LTD employee.
- 2.4. **Personal Data/Information** - information or totality of information that can be associated with a specific person (the User) and can be used to identify that person.
- 2.5. **Privacy Policy** (also referred to as “**Policy**”) – this Privacy Policy posted on the homepage of our Website which may be revised or updated from time to time as stated in subsection 1.3. of this Privacy Policy.
- 2.6. **GG International LTD** (also referred to as “**Company**”, “**We**”, “**Us**”) – a company incorporated under the legislation of the BVI for the purpose of the GG World Lottery global implementation,

not being a financial entity, stock, exchange, investment entity or a partner, employer, agent or adviser for any User.

- 2.7. **GG World Lottery Token Sale Platform** (also referred to as “**Token Sale Platform**”) – is the Website on which GGCOIN Tokens will be sold.
- 2.8. **GG World Lottery Product** (also referred to as “**GG World Lottery**”, “**Product**”) – is a lottery product, tickets of which, will be sold on the multiple lottery websites made by the Company, after the Token Sale end, allowing lottery participants to take part in a transparent lottery that base its draws on blockchain.
- 2.9. **GGCOIN Token Sale** (“**Token Sale**”, “**Crowdsale**”) – an offering of GGCOIN Tokens to eligible Authorized Users to purchase GGCOIN Tokens during the Sale Period, according to the respective phases (launches) and GGCOIN Tokens Price described on the Website and in White Paper.
- 2.10. **GGCOIN Token/Coin** (“**GGCOIN**”, “**Token(s)**, **Coin(s)**”) – a cryptographic token, which is a software digital product (not being cryptocurrency), which is created by the Company and solely provides the right to Blockchain-based benefits. The GGCOIN token is designed as a decentralized ERC20 token on the Ethereum blockchain. For more information about Blockchain-based benefits, please see the GGCOIN Token Sale Agreement accessible on the Website.
- 2.11. **User** (also referred to as “**You**”) – any person, who uses the Website, with or without prior registration and authorization. The Company reserves its right to set forth at any time upon its own discretion special eligibility or other requirements to certain Users to participate in a certain phase of GGCOIN Token Sale as mentioned in the GGCOIN Token Sale Agreement, on the Website and project’s White Paper.
- 2.12. **Verification Procedure** – procedure, conducted in accordance with this Policy by the Company, aimed at determining whether a potential User is an Authorized User and is eligible to participate in the Token Sale. For more information on the verification procedure, please refer to the GGCOIN AML/KYC Policy that can be accessed on the Website.
- 2.13. **Website** – the website maintained and owned by the Company at <https://ico.gg.international/>.
- 2.14. **White Paper** – one of the official Accompanying Documents published by the Company on the Website, describing technical and marketing details of the GGCOIN Token Sale, the idea and purpose of the Token Sale Platform, as well as GGCOIN Tokens Price and Tokens Sale Period.

3. PURPOSE OF PERSONAL DATA USE

- 3.1. We collect from the Users only the Personal Data that we need for their proper use of the Website or for purchase of GGCOIN Tokens. In particular, we use Your Personal Data to:
 - administer Our Website and provide services;
 - comply with relevant AML/KYC rules in accordance with our AML/KYC Policy that can be accessed on the Website;
 - develop new products and services;
 - personalize Our Website for You;
 - send You technical notices and support and administrative messages;
 - communicate with You about products, services, promotions, events and other news and information we think will be of interest to You;
 - monitor and analyze trends, usage and activities in connection with Our Website and services;
 - provide third parties with statistical information about Our Users (but those third parties will not be able to identify any individual User from that information);
 - detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Company and others;
 - link or combine Personal Data We collect from or about You.

4. USER`S RIGHTS

- 4.1. You have a right to access to Your Personal Data, withdraw your consent for data processing, obtain the information whether or not your personal data is being processed and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting Us at contact@gg.international. Nevertheless, this request must comply with the GGCOIN Token Sale Agreement and Our legal obligations. We shall delete Your respective Personal Data from any sources within 24 hours from the moment We receive such request from You. At that the Company reserves its right to suspend provision of any services to You referring to GG World Lottery Project and/or delete Your Account on the Website without prior notice, not providing any compensations to You.
- 4.2. To disable Your account and remove Your Personal Data completely, please email us at contact@gg.international with a request that complies with the GGCOIN Token Sale Agreement.
- 4.3. You have the right to receive notices of processing activities from the Company.
- 4.4. You have the right to transfer data in a machine-readable format.
- 4.5. You have the right to lodge a complaint with the local supervisory authority, authorized to review such complaints.
- 4.6. You are entitled with and may exercise any of the rights and freedoms guaranteed by the General Data Protection Regulation (the GRPR) with regard to the processing of personal data if you fall under its` material and territorial scope as defined in the GDPR.

5. PERSONAL DATA COLLECTION AND PROCESSING

- 5.1. We collect Personal Data from running the Website and use Personal Data, provided to Us by You. We may collect such Personal Data:
 - phone and e-mail address,
 - full name and surname;
 - date of birth and gender;
 - address, country, state, city, postal code;
 - citizenship;
 - country of residence (as stated in subsection 5.2 of this Policy);
 - User`s ID (as stated in subsection 5.2 of this Policy).
- 5.2. We reserve the right to conduct a Verification procedure, that shall take place before User`s registration on the Website, including requesting documents that contain Personal Data (including Users`s ID and proof of residence) and collecting the relevant data in order to determine whether a potential User is an Authorized User and is eligible to participate in the GGCOIN Token Sale as stated in the GGCOIN Token Sale Agreement. If you are a citizen or a permanent resident of any of the Restricted Countries, as defined in the GGCOIN Token Sale Agreement, please contact us at contact@gg.international.
- 5.3. We reserve the right to engage a third party to conduct KYC and/or Verification procedures. If such events take place, procedures comply with this third party`s internal privacy policy.
- 5.4. When registering on the Website and providing consent to collection, storing and processing of your personal data, you warrant that you have read and understood this Policy and relevant AML/KYC Policy that can be accessed on the Website.
- 5.5. We reserve the right to collect any Other Data, including data which is not Personal per se such as:
 - address of Your wallet on Ethereum Blockchain platform;
 - postal address;
 - Telegram Messenger User Name;

- any other information if we deem necessary in accordance with the Privacy Policy set forth herein.
- 5.6. When You visit the Website or use our products, We automatically collect the Personal Data sent to Us by Your computer, mobile phone, or other access device. This Personal Data may include:
- your IP address;
 - device information including, but not limited to, identifier, name, and type, operating system;
 - mobile network information;
 - standard web log information, such as Your browser type, and the pages You accessed on Our Website, access times, website navigation paths.
- 5.7. The Company collects some data automatically, namely information about devices (including mobile devices), which you may use to access the Website, IP-address of your devices, used browser and operating system, date, time, geographical location data of your access to the Website. However, we will not release Your personally-identifying information of such kind to any third party without Your consent, except as set forth herein.
- 5.8. We do not process any sensitive Personal Data, such as religion, race, ethnicity and/or political views.
- 5.9. We may also use third party service providers, which we entrust storing data, its collection and analysis. This is made in order to enable You to get the best services possible and to make our cooperation the most effective and with the best benefit for You. These third parties have their own privacy policies and their own conditions, whether to collect your data or opt-out from it. Thus, we do recommend You to getting yourself acquainted with the terms of third party service provider, if You use other services on our Website. We will not seek any of your Personal Information through any other software platforms, data web resources etc., even if this information is necessary for You or your usage of the Website.
- 5.10. When You access the Website, or use Our Product or services We (or Google Analytics or similar service provider on our behalf) may place small data files called cookies on Your computer or other device. We use these technologies to recognize You as our User, customize Our Website, understand usage and determine the effectiveness of email marketing campaigns, measure promotional effectiveness and collect information about Your computer (as described in clause 5.6. hereof) or other access device to mitigate risk, help prevent fraud, and promote trust and safety. You may control the use of cookies within Your internet browsers' settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of our Websites and services may be impaired. Web beacons (or pixel tags) are electronic images that may be used in our web Services or emails to help deliver cookies, count website visits, understand usage and determine the effectiveness of email marketing campaigns.
- 5.11. You agree to provide the Personal Data specified herein and agree that Your provided Personal Data may be processed and stored by Us or Our counterparties (as specified in clause 5.9. hereof) during the period of time that is practically necessary for the purposes for which the information may be used.
- 5.12. The components of Personal Data that mentioned below may be modified from time to time according to the Applicable law and our needs that will be reflected in this Policy. We will not collect any other Personal Data except for the mentioned herein until we amend and post these amendments to the Policy on the homepage of our Website.
- 5.13. You have the right to request personal information safeguards in case your data is being transferred outside of the territorial scope of the GDPR as defined in the GDPR.

6. PERSONAL DATA PROTECTION AND SHARING

- 6.1. We will do any and all efforts and actions prescribed by Applicable Law to store any of Your Personal Data in secrecy, to protect Your Personal Data from accidental loss, disclosure or erasure, from illegal processing or illegal access.
- 6.2. We store and process Your Personal Data on Our servers in various jurisdictions, where our facilities and/or Our service providers are located. By submitting Your Personal Data, You agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Policy. We protect Your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards We use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. We also authorize access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent than in Your country. From time to time, the Personal Data may be also stored in other locations, and in such cases, We will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.
- 6.3. We reserve our right to share Your Personal Data with the following parties and with regard to the following cases:
 - companies that We plan to merge with or be acquired by (all or a portion of our business);
 - companies in connection with, or during negotiations of, any sale of company assets or any financing by another company;
 - service providers that execute any work for us (such as hosting providers, identity verification, support, payment, and email service providers);
 - in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
 - if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of GGCOIN Tokens or others;
 - between and among Company and its current and future corporate parents, affiliates, subsidiaries and other companies under common control and ownership;
 - when we believe, in our sole discretion, that the disclosure of personal information is necessary to report suspected illegal activity or to investigate violations of our Terms and Conditions.
- 6.4. We will not provide Your Personal Data to any other Website users or third parties other than described in clause 6.3. herein without Your consent or direction.
- 6.5. We will not sell or rent Your Personal Data and/or customer lists to third parties without your explicit consent.
- 6.6. We may combine Your Personal Data with information we collect from other companies and use it to improve and personalize the Website and our products, as well as our content and advertising.
- 6.7. We may use Your name and email address to provide You with information about products or services that may be of interest to You, but we will not use Your Personal Data without complying with applicable laws and, where appropriate, obtaining your consent.
- 6.8. Our services may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If You follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own terms of use privacy policies and that We do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location

data. Please check these policies before You submit any personal data to these websites or use these services.

- 6.9. We may allow others to provide analytics services on our behalf in connection with our services. These entities may use cookies and other technologies to collect information about your use of the services and other websites and apps (if any), including your IP address, web browser, pages views, app performance, time spent on pages and links clicked. This information may be used by the Company and others to, among other things, analyze and track data, determine the popularity of certain content and better understand your online activity.

7. DATA STORAGE AND RETENTION

- 7.1. In accordance with Applicable Law and as needed to provide services to Our Users, We may store and retain Your Personal Data provided it's integrity and the appropriate approach to it. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain Your Personal Data for as long as Your account is active. Moreover, Your Personal Data may be held beyond the abovementioned period until it is indispensable for Us to have relevant information to respond to any issues that may arise later.

8. SECURITY

- 8.1. We use relevant electronic and procedural safeguards to protect the privacy of the information You provide to Us from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Please note that We are not liable for the security of any data You are transmitting over the Internet, or third-party content.

9. CONTACT DETAILS

- 9.1. If you have any questions regarding this Privacy Policy, please contact us at contact@gg.international.