

OilWellCoin AML/KYC and Privacy Policy

1. AML/KYC and PRIVACY POLICY STATUS AND ACCEPTANCE

- 1.1. This AML/KYC and Privacy Policy (hereinafter referred to as the “Policy”) sets forth the general rules and procedures governing the implementation and conduction of Know-Your-Customer (“KYC”) procedures in accordance with the relevant Anti-Money Laundering rules (“AML”) as well as the general rules of Buyer’s Personal Data collection, processing, distribution, use and keeping by the Company during the conduction of Know-Your-Customer (“KYC”) procedures.
- 1.2. Each Buyer must carefully read and comply with this Policy. It is understood and presumed per se that by providing Us the Personal Data directly on our request, the respective Buyer fully read, understood and accepted this Policy. If any Buyer does not agree with this Policy in general or any part of it, such Buyer must not purchase OILD Tokens.
- 1.3. In terms of OILD Token Sale this Policy shall be considered as inalienable part of the OILD Token Sale Agreement. In terms not regulated by this Policy, the OILD Token Sale Agreement shall apply to the relationships that arise hereunder.

2. DEFINITIONS

- 2.1. **Personal Data** - information or totality of information that can be associated with a specific person (the Buyer) and can be used to identify that person.
- 2.2. **The Company** (also referred to as “We”, “Us”) – Hadius Pro Marketing Pte. Ltd., registered in the Republic of Singapore, registration number 201825916Z, (Singapore, #14-02 11 Collyer QUAY), the organization founded to develop the Platform, and provide services, operating control and maintenance for the Platform. The right of ownership for <https://oilwellcoin.io/> website, OilWellcoin platform, as well as all the existent or received in the working process intellectual property rights are vested in the Company.
- 2.3. **The OilWellCoin Platform** – the digital platform (which is not a legal body) that uses distributed ledger technology, technology of processing and access to data, digital services, meant for getting/giving advisory and other services all over the world using Ethereum based smart contracts. The Platform is available in the mobile app.
- 2.4. **OILD Token Sale** – period of time that includes preparation for an offering of OILD Tokens and the period of time during the offering of OILD Tokens to eligible Buyers to purchase OILD Tokens.
- 2.5. **OILD Tokens** (also referred to as “OILD”; “Tokens”) – digital utility token, implemented based on the Ethereum public blockchain as the ERC20 Ethereum token, that can be used to get access to the services and functionality of the platform, services provided on the OilWellcoin platform.
- 2.6. **Buyer** (also referred to as “You”) – any person or legal entity, who intends to purchase OILD Tokens. The Company reserves its right to set forth at any time upon its own discretion special eligibility or other requirements to certain Buyers to participate in a certain phase of OILD Token Sale as shall be mentioned on the Website and Whitepaper.
- 2.7. **Website** – the website maintained and owned by the company at <https://oilwellcoin.io/>.
- 2.8. **Whitepaper** – one of the official Accompanying Documents published by the Company on the Website, describing technical and marketing details of the OILD Token Sale, the idea and purpose of the Company, as well as respective pricing and tokens distribution periods.

3. PURPOSE OF PERSONAL DATA USE

- 3.1. We collect from the Buyers only the Personal Data that we need for purchase of OILD Tokens. In particular, we use Your Personal Data to:
 - conduct Know-Your-Customer (“KYC”) procedures in accordance with the relevant Anti-Money Laundering rules (“AML”)
 - detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Company and others;

4. AML/KYC POLICY

- 4.1. The Company is strongly committed to preventing the use of its operations for money laundering or any activity which facilitates money laundering, or the funding of terrorist or criminal activities.
- 4.2. On a global level, in order to prevent and combat money laundering and terrorism financing, there has been an introduction of the number of laws concerning the customer identification and verification procedures including but not limited to the EU Directives AMLD4 and AMLD5, with the latter being set to take effect next year by way of amending the AMLD4 and bring businesses operating with the virtual currencies under the scope of the Anti-Money Laundering Directive. In the United States regulation of the AML is carried out by a special government body under the US Treasury – FinCEN. In particular, FinCEN regulates, so-called, "money services business" (MSB). In 2013 FinCEN published the clarification on the regulation of persons administering, exchanging or using virtual currencies bringing the businesses dealing with virtual currencies under the scope of AML/KYC in terms of spotting suspicious financial behavior.
- 4.3. In order to ensure that our operations are compliant with the AML/KYC rules and procedures, we are implementing the AML/KYC policies detailed below.
- 4.4. As part of our AML (Anti-Money Laundering) Policy in order to combat money laundering and illegal financing activities the Company follows the customer risk assessment principles that include but are not limited to the following:
 - raise awareness on money laundering issues;
 - appoint a designated Money Laundering Reporting Officer (MLRO). The MLRO is to report any suspicious transactions to the appropriate Financial Authority;
 - assist law agencies and authorities to trace, seize, and confiscate the proceed of criminal activities;
 - freeze any funds deemed suspicious and investigate the source of finance;
 - introduce a Know-Your-Customer Policy (KYC);
 - exercise reasonable measures to obtain information about the true identity of the persons on whose behalf a transaction is made;
 - record keeping procedures – Maintain, for a specific time period, all necessary records on transactions, both domestic and international;
 - pay special attention to all complex, unusually large transactions;
 - adopt economic, administrative, self-regulatory and other measures which can be taken to create an effective shield against money laundering;
 - train staff accordingly;
 - employ proper care in the hiring of new staff.
- 4.5. As part of the customer risk assessment, the following will act as Money Laundering Warning Signs based on guidance provided by Financial Action Task Force (FATF) – international body set up to combat money laundering:
 - customer tells that the funds are coming from one source but then at the last minute the source changes;
 - evasiveness or reluctance to provide information;
 - incomplete or inconsistent information;
 - unusual money transfer or transactions (e.g. when customer deposits unusual amounts (e.g. 9,990 euros) so as not to come under the threshold when KYC applies);
 - complex group structures without obvious explanation that may be designed to disguise the true source and ownership of money;
 - when money is coming from the list of 'high-risk and non-co-operative jurisdictions' according to FATF;
 - negative public information available about the client or company.
- 4.6. The above principles and warning signs are aimed at determining the customer's risk in terms of propensity to commit money laundering, terrorist financing or identity theft.
- 4.7. Every employee is required to act in furtherance of this policy statement to protect the Company from exploitation by money launderers or terrorists.
- 4.8. The Company adopts the KYC (Know-Your-Customer) Policy and reserves the right to undertake KYC in order to verify the identity of its customers at any point.
- 4.9. As a part of the exercise of this right, the Company may require the following information to be sent:

- copy of passport or national ID;
- recent utility bill;
- recent bank account statement;
- documents that show the source of income;
- documents that prove that the taxes from the income received had been paid.

‘Recent’ means no longer than 3 months from date of issue.

- 4.10. **Please note** that the list above is not exhaustive and we reserve the right to require additional information at any time to verify the client’s identification and to fully satisfy the latest Anti-Money Laundering rules.
- 4.11. If any of the above documents are requested, prior to sending them to us we may require them to be certified as a true copy of the original by a Solicitor or a Lawyer who must use their company stamp. We require the documents to be sent to us in high quality color format. We reserve the right to reject any documents, which do not comply with the above or if we have doubts as to their veracity.
- 4.12. If any doubt arises we reserve the right to check the information provided, as part of the KYC Policy, using non-documentary methods including but not limited to contacting the customer directly.
- 4.13. MLRO has a right to freeze any funds already transferred should the suspicion as to the sources of those funds arises after they have been deposited and investigate the customer’s transaction in retrospect.

5. PERSONAL DATA PROTECTION, SHARING AND PROCESSING.

- 5.1. 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.
- 5.2. 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.
- 5.3. 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;
 - 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 OILD Tokens or others;
 - 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.
- 5.4. We will not provide Your Personal Data to any third parties other than described in clause 5.3.
- 5.5. We do not process any sensitive Personal Data, such as religion, race, ethnicity and/or political views.
- 5.6. You agree to provide the Personal Data specified in clause 4.9. and agree that Your provided Personal Data may be processed and stored by Us during the period of time that is practically necessary for the purposes for which the information may be used.

5.7. The components of Personal Data that mentioned above may be modified from time to time according to the Applicable law.

6. DATA STORAGE AND RETENTION

6.1. In accordance with Applicable Law, 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 hold beyond the abovementioned period till it is indispensable for Us to have relevant information to respond to any issues that may arise later.

7. SECURITY

7.1. We use relevant electronic, administrative 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.

8. CORRECT/UPDATE/DELETE PERSONAL DATA

8.1. You have a right to access to Your Personal Data and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting Us at info@oilwellcoin.io. Nevertheless, this request must comply with OILD Token Sale Agreement and Our legal obligations.