

Privacy Policy Statement

Introduction

The management of ETH Smart Contract Tech Ltd. and its group companies ("the Group") are committed to protecting the privacy and security of personal and corporate information gathered through the <https://300cubits.tech> web site in accordance with the laws of Hong Kong and industry best practices, including the Personal Data (Privacy) Ordinance of Hong Kong. It is critical to the commercial viability and reputational integrity of the Group, its founders, employees, advisors and related parties that it proactively and carefully meets all its data privacy obligations in the conduct of its operations.

What data will the Group collect?

The Group will generally, but not exclusively, collect data from the following sources and means:

1. Data directly submitted or shared by individuals in the course of interaction with the Group's employees or website.
2. Data received from third parties. Third parties may include peer-to-peer referrals, introductions intermediated through a business relationship, individual contact information received from professional colleagues within the same organization, etc.
3. Data received from third-party platforms which include social media and other channels such as WhatsApp, Facebook, Twitter, Telegram, Youtube, Twitter, Medium, crypto currency chatrooms such as Reddit, Bitcointalk, etc.
4. Cookies on the 300cubits website which may be tailored for advertising purposes. For example, repeat web site visitors to a certain section of the web page and visitors who perform certain actions such as registration or video viewing may be presented with additional information which we believe is relevant to their interest in all products and the 300cubits project. These cookies may be utilized through third party providers, such as Facebook's Pixel or Google's AdWords programs. If your browser setting is set to accept cookies, then you are in effect consenting to accepting any cookies on 300cubits' web site that may be used in the manner above.

The personal data submitted via these sources may include: legal name, passport information,

national ID information, email address, wallet address, container liner freight payments, etc.

Aggregated, that is to say, non-personalized data, may be collected in the form of web site visits or hits, and the origin and nature of those hits. Such data collected could include country of IP location, time stamp of the visit, and uniqueness of the hit (for example, is the hit from a repeat or a unique visitor). This data does not contain or reference individualized, personal data, but will provide other important data regarding the nature of the web site visit as determined from router and server data.

How will the Group use the data collected?

The Group will use the data collected in the following ways.

1. Data collected from cookies, newsletter subscriptions and other means may be used in providing marketing information to individuals. Such marketing information composes of text, video or graphical advertisements to communicate products and services, as well as events, milestones and announcements that may be of interest to the recipient. The recipient has the right and the ability to discontinue receipt of these advertisements by deleting cookies on his/her browser, requesting amendment or deletion of recorded data, and/or un-subscribing from the newsletter.
2. Aggregated data may be collected to assess web site visits and monitor visitor traffic activity before and after promotional campaigns are run, or to assess maintenance requirements of server infrastructure such as upgrades and increased capacity. This data will be non-personalized, that is to say, not directly attributable to individual(s), but may contain contextual information such as country of IP address, timestamp, and uniqueness.

Any other use of data that does not strictly fit into the above categories will be defined by the efforts of the Group staff to increase acceptance of TEU tokens in the shipping and transportation industries where commitment discipline on the part of counterparties is weak and defaults are common, costing industry and society great losses in environmental, financial and operational terms. Data collected may therefore be used to deliver digital or physical content and

communications related to blockchain technology, software solutions, crypto currencies that the Group believes would be of interest to and potentially benefit the recipients who have entrusted the Group with their care. The personal and other data created through such interactions is meant to enhance contact and product awareness, including Internet-based and mobile advertising, which we believe would be welcome by the recipient.

Will the Group share the data collected with others?

The Group will not sell your personal data.

The Group may expose or share your personal data on a confidential basis with third parties whom we engage to assist us in providing services or products to you.

The Group companies may share or use your data in order to provide services and products to you, or communicate information through means such as newsletters, emails or promotional materials and events that we believe would be of interest to you. You will have the option to dis-continue receipt of this information at any time.

If required, the Group may share your data with law enforcement, governmental or other regulatory agencies who have the legal right to request data in the jurisdiction that they operate within.

How will the Group protect and manage your data?

The Group safeguards and encrypts information and data securely in the Group's system and retained on a needed basis. Only trained, authorized staff have access to the data. The Group will only store data online on a needed basis. The Group may, from time to time, move unneeded data to offline, in form of password protected hard drive safe kept in a bank safe with only authorized access by the officer(s) of the Group for law enforcement and audit purpose. Access procedures are documented in internal compliance procedures.

How will the Group handle data breach?

The Group endeavours to protect customers' data but in case of unforeseen data breach, we will notify our customers as soon as possible.

What are your rights?

The right of access: If you have specific questions about your data, you use contact below for further information.

The right to be forgotten or to rectification / erasure: You may contact below to access, correct, amend or delete information that we hold about you.

Right to object: You may contact below to opt out of inclusion of your data in our data analytics.

The right to data portability: We will export your data to a third party at any time upon your request.

How can you contact the Group?

Written requests to the Group can be made out to Data Protection Officer:

Jonathan Lee
Co-founder, 300Cubits
Smart-Space Fintech1 - Unit 617-620
Level 6, Core E, Cyberport 3
No. 100 Cyberport Road, HK

Or:

info@300cubits.tech

If you are a citizen or resident of Hong Kong, the European Union, or any other jurisdiction which requires data collectors to enable users to access and amend their data, you can make requests either by post or email to the addresses above.

27-May-2018