



ICO PRIVACY POLICY

May 11th, 2021

Version 0.2

LEGAL NOTICE

Bcube is an online service developed by ACINTYA GLOBAL HOLDINGS SAS, a French simplify joint-stock company with a capital of 1,000 euros, registered in the Trade and Companies Register of Nanterre under number 830 862 637, domiciled at 7 rue le Bouvier, 92340, Bourg-la-Reine.

The director of publication is Mr Erwan Rouzel.

Contact : contact@b-cube.ai

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1. Foreword

- 1.1. ACINTYA GLOBAL HOLDINGS (hereinafter referred to as the “**B-cube**” or the “**Company**”) planned to issue tokens that it has developed (the “**Bcube**”), for a maximum total amount of 50,000,000.00 Bcube (the “**ICO**”).
- 1.2. For further information, please consult our Company’s [White Paper](#) and website related to the ICO at the following address: ico.b-cube.ai (the “**Website**”).
- 1.3. To inform You transparently, this privacy policy (the “**Privacy Policy**”) has been implemented. It explains in detail why and how your personal data is processed when You subscribe to the ICO.
- 1.4. The Privacy Policy is accessible at any time on the ICO [Website](#), and prevails over any previous version.

2. Subject

- 2.1. Our Company firmly believes that trust is key to its relationships with its subscribers (the “**Subscribers**”). In this respect, the protection of your data and privacy is its top priority.
- 2.2. This is why our Company puts great emphasis on collecting and processing your data with the utmost care and in compliance with the applicable legal framework.
- 2.3. This Privacy Policy is intended to inform You, as a Subscriber, through any terminal, application or device (hereinafter the “**Equipment**”), about the way our Company processes, as a controller, information enabling to identify You either directly or indirectly (hereinafter “**Personal Data**”) in the context of your subscription to the ICO.

3. Update

- 3.1. The Privacy Policy may evolve. The up-to-date version is the one available on the Website when using the Service.
- 3.2. By subscribing to the ICO, You are consenting to the version in force and available on the Website at that time.

4. Data collected and Purposes

- 4.1. When You subscribe to the ICO, our Company processes Personal Data for special purposes, each of them being duly legitimated by a valid legal basis.
- 4.2. Please find hereinafter a summary table of the information collected, the purposes and the legal basis for each of them in accordance with the General Data Protection Regulation (“**GDPR**”).

	INFORMATION	PURPOSE(S)	LEGAL BASIS
Personal identification	First and last name, date and location of birth, address, citizenship, a copy of passport or ID card, and any other necessary information.	To comply with the legislation in force regarding the Anti-Money Laundering and Know Your Customer procedures (“ AML/KYC Procedure ”).	Legal obligation concerning the AML/KYC Procedure.
Public keys	Address of the Subscriber public keys.	To enable You to connect your public keys to our dashboard .	The execution of the contract.
Referral program	The unique identifier number of the referrer; The public address of the referee’s external wallet; and The hash of the transaction.	To enable You to benefit from our referral program by calculating your earnings (commissions) and identifying the referee.	The execution of the contract, and its option of the referral program.
Browsing information	Browsing information from Cookies (please see Article 10 above) which qualify as Personal Data.	Our Company is willing to understand how Subscribers use its Website for the ICO and needs to process various browsing information for the performance of analytic operation related to the Website use.	The legitimate interest of our Company, which consists of : (i) understanding the way its Website is browsed by Subscribers and visitors (including You); and (ii) improving the Website where needed.
Discussions or comments	Identification data (i.e. the information you provide, including your name and email address) ; Content of the message(s) You sent to our Company as a question/request.	Managing and following up any questions, requests or feedback You may submit. Please note that this processing is only carried out if You submit a question, request or feedback directly to our Company's. Otherwise, Your Personal Data is not processed for this purpose.	The legitimate interest of our Company, which consists of duly managing its relationships with You.

4.19. You are under no obligation to provide the requested Personal Data. Nevertheless, our Company draws to Your attention that, in such a case, access to the ICO may be altered, if not impossible.

- 4.20. In any event, and disregarding the processing purpose at stake, please note that our Company will comply with a strict data minimization principle and will thus only collect and process Personal Data which is necessary for the above purposes.

5. Data recipients

- 5.1. Our Company shares your Personal Data with third-party service providers and suppliers which assist Company in fulfilling the purposes specified in this Privacy Policy, including the server provider “[Heroku Cloud](#)” who stores securely your Personal Data in Europe.
- 5.2. The service providers and suppliers may have access to Personal Data for the sole and exclusive purpose of carrying out the missions assigned to them. Our Company ensures that the service providers and suppliers have sufficient legal and technical guarantees for the performance of the mission and comply with the applicable laws and regulations.
- 5.3. Furthermore, as the case may be, our Company shares your Personal Data with competent courts and any other governmental and/or public authorities requesting access to your Personal Data, within the extent legally permitted.
- 5.4. In any event, our Company communicates your Personal Data to the above recipients on a strictly need-to-know basis and only as necessary for fulfilling duly identified processing purposes.

6. Storage period

- 6.1. Our Company stores Personal Data for a limited duration, not exceeding the fulfilment of purposes described in Article 4 (*Data collected and Purposes*) of this Privacy Policy.
- 6.2. **Personal identification.** The maximum storage period of your Personal Data collecting to comply with the AML/KYC Procedure is five (5) years from your subscription to the ICO.
- 6.3. **Browsing information.** The maximum storage period for Cookies is thirteen (13) months from the time they are placed on your browser or Equipment. At the end of this period, new consent will be required.
- 6.4. **Other information.** Concerning your other Personal Data, as described in the summary table above, our Company will not retain your Personal Data for more than one (1) years following your subscription to the ICO or the last contact from you.
- 6.5. If our Company considers it does not need to retain your Personal Data in its active database, it will archive it and will ensure that access thereto is restricted to a limited number of persons who have an actual need to access your Personal Data.

7. Data transfer

- 7.1. Personal Data may be processed outside the European Union territory. In that situation, Company shall take all necessary precautions and alternatively or cumulatively ensure that

(i) an adequacy decision has been taken by the European Commission regarding the country of destination; (ii) contractual clauses adopted by the European Commission or the supervisory authority have been signed with the recipient; (iii) the recipient adheres to an approved code of conduct or certification mechanism.

8. Subscriber rights

8.1. As a data subject, You benefit from various rights regarding the processing of your Personal Data. These are as follows:

- right to request from Company access to and rectification or erasure of your Personal Data;
- right to request from Company restriction of the processing concerning You;
- right to object to the processing of your Personal Data;
- right to portability of your Personal Data;
- right to give guidelines regarding the use of your Personal Data after your death; and
- right to complain with the French Data Protection Authority (CNIL), the competent supervisory authority.

8.2. To exercise your rights or for any question on Personal Data protection, You shall make a request accompanied by proof of identity to the Company in accordance with the Article 11 (*Contact*) hereinafter.

8.3. Company shall strive to reply without undue delay and at the latest within one (1) month after the receipt of the request. Company reserves the right to extend this period to three (3) months in the case of a complex request.

8.4. Company is committed to protect your Personal Data and comply with the applicable data protection legal framework.

8.5. This is the reason why Company requires your assistance to this end. Thus, You commit to informing Company if the Personal Data You shared with us becomes obsolete or inaccurate.

8.6. In addition, in the event You provide Company with information enabling to identify directly or indirectly any other natural persons (e.g. You sent a request to Company with the contact email address available on the Website and share Personal Data concerning another natural person in your email), You represent and warrant that, prior to sharing this information with Company, such other natural persons have been provided with this Privacy Policy and, to the extent applicable, have consented to the processing of their data.

9. Security

9.1. Company undertakes to take all appropriate technical and organizational measures to ensure the security and confidentiality of the Personal Data processed.

10. Cookies

- 10.1. You are informed that information may be transmitted to Your browser or Equipment while using the Website (“**Cookies**”). When You browse the Website for the first time, a Cookie banner may be displayed requesting You to accept, refuse or configure Cookies.
- 10.2. Our Company uses cookies for :
- functionality (language, location, etc.);
 - advertising;
 - supporting;
 - hotjar cookie;
 - referral cookie, to be able to provide the referral program.
- 10.3. You may accept, refuse and delete certain or all Cookies. You may also contact us if You have any questions about our Company’s cookies, as described in the Article 11 (*Contact*) hereinafter.
- 10.4. You are informed that the refusal of certain Cookies may affect the delivery of the Service provided and the navigation on the Website.
- 10.5. Company informs You that Cookies may be configured in the help menu of your browser, at the following URLs: [Google](#); [Mozilla Firefox](#); [Safari](#); [Edge](#) and [Opera](#).

11. Contact

- 11.1. If You have any question regarding this Privacy Policy, including but not limited to concerning your rights as described in Article 8 (*Subscriber rights*) above, please contact the Company by sending a mail to contact@b-cube.ai or by the tab “[Contact](#)” of the Website.
- 11.2. For further information you may also consult our Website (including our [FAQ](#)) and our [White Paper](#).