



AXIS TOKEN INTERNATIONAL, LTD. PRIVACY POLICY

Last updated: August 16, 2018

This Privacy Policy (“**Policy**”) explains how Axis Token International, Ltd., a corporation formed under the laws of the Cayman Islands (“**ATI**”), and LaneAxis, Inc., a Delaware corporation (“**LaneAxis**” and together with ATI, “**Company**”, “**us**,” “**we**” or “**our**”), collects, stores, uses and protects personal information, when you access and/or use the website www.laneaxis.io (including all and any subdomains, collectively, the “**Website**”), services located at or provided on the Website (“**Services**”) or when you otherwise interact with the Company.

The data controller in relation to the processing of your personal data is
Axis Token International, Ltd.
c/o Cayman Fiduciary Limited
Third Floor, Landmark Square, 64 Earth Close
PO Box 707 Camana Bay
Grand Cayman KY1-9006
Cayman Islands
E-mail: legal@laneaxis.io

Should you disagree with any provision of this Policy you shall cease using the Website or any Services immediately. The content of the Website and websites accessible from hyperlinks on the Website, do not form an integral part of this Policy. If you are using Services on behalf of any entity, you acknowledge this Policy on such entity’s behalf and that you have the authorization to make such acknowledgement on behalf of such entity.

This Policy applies to all visitors, users and others who access or use the Website or Services.

Company may amend this Policy at any time and in its sole and absolute discretion. We will provide notice of any amendment to this Policy (a) by posting any revised document to the Website and updating the “Last updated” field above accordingly, (b) by sending to your email which we have (if you have previously registered an account) information about updated in this Policy, or (c) by any other reasonable method we deem appropriate. Any change to this Policy will be effective immediately upon such notice and apply to any ongoing or subsequent use of the Website and Services. Should you not agree with such changes please immediately refrain from accessing or using of Website and Services.

The processing of your personal data in relation to your use of the Website and/or use of Services will be subject to this Policy. If you disagree with any part of this Policy, then you may not access the Website and/or use the Services.

1. Collection of Data and Information. When you are using the Website and/or Services, you may provide your personal data and information voluntarily, including but not limited to your name, residential address, email address, ID and digital wallet address or bank account information, depending on your method of payment, IP address, device information including, but not limited to, identifier, name, and type, operating system, mobile network information and standard web log information, such as your browser type, and the pages you accessed on our Website as well as other information that may be collected by Company and/or third parties’ services implemented on the

Website. In addition, we may collect certain technical data sent to Company by your computer, phone or other access device. This information may include your IP address, device information, including but not limited to identifier, name and type, operating system, location, mobile network information and standard web log information, such as your browser type, traffic to and from Website and the pages you accessed on Website. In addition, Company may collect personal information from or about you in other ways such as your interaction with customer support or contractual relationships with Company. Data and information provided by you will be stored by the Company within all the time you will use Services and have an account.

2. Setting-up and Using an Account. In order to use Website and/or Services you may be required to set up a personal account or fill a form and provide your personal data and information such as name and email address to secure your access to your account and any other information as may be required by Company in order to set up a personal account. Company may require you to provide additional information to verify your identity, address, source of funds or any other information in your account, such as your date of birth, copy of ID, citizenship, country of residence, and other information directly or through a third party. You are responsible for relevance and validity of information to be provided when registering an account.

You can review your personal information inside of your account. You can edit your personal information or delete your account by contacting Company. If you cancel or delete your account, Company may keep your information in its database. This may be necessary to deter fraud by ensuring that a person who tries to commit fraud will not be able to avoid detection simply by closing his/her account and opening a new account. However, if you close your account, your personally identifiable information will not be used by Company for any further purposes, nor sold or shared with the third parties, except as necessary to prevent fraud or money laundering and assist law enforcement in accordance with this Policy.

3. Use of Cookies. Company may place small data files (cookies) or pixel tags on your computer or other device when you access Website. Company may use these technologies to recognize you as a returning user, customize its services, content and advertising, evaluate marketing activities, and collect information about your computer or other access device. Company may use various cookies, including but not limited to session cookies, persistent cookies, and “flash cookies”. Company may codify its cookies to limit access of third parties to the received information. You can independently control the use of cookies from your browser or browser add-ons; however, blocking or disabling Company’s cookies may interfere with your use of Website.

4. Use of Log Files. Company may use the log files to collect your Internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, other technical information and number of clicks to analyze your activity on the Website, collect geographic and demographic information, and evaluate content of the Website. Information collected from log files is not personally identifiable.

5. Storing, Using and Sharing Your Data and Information. Company will store your personal information in its database. Company may contract third parties to store your personal information. Company does not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. Company may use your personal information to customize your use of Website and Services; analyze your activity on Website, including through third parties such as Google Analytics and alike; evaluate and improve its marketing efforts and for other reasons relevant to your use of Website and Services. Legal basis for the process of your personal data is a performance of an agreement concluded between your and Company while using of Company’s Services.

Company may share your personal information with: (a) third parties who provide services to Company for storing your personal information, fraud prevention, marketing and technology, services of a sale; such third parties are bound by contracts with confidentiality and non-disclosure clauses and may not use your personal information for any reason other than specified in this Policy; (b) escrow or any other processor of your payment; (c) third parties who provide services to Company for KYC/AML processes; (d) law enforcement, government officials, or other third parties when Company is required to provide your personal information by law, subpoena or court order; (e) parent and/or subsidiary and/or affiliated company; (f) third party identification services providers for fraud prevention and to comply with anti-money laundering and know your customer regulations; (g) law enforcement, government officials, or other third parties if (i) we are compelled to do so by a governmental order or by law; or (ii) we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our terms; (h) other third parties with your consent or direction to do so.

6. Accessing or/and Correcting your Information. Subject to the conditions of applicable data protection laws you have the right to access and rectification of your personal data. In some instances, you may visit our Website to verify and update certain information. If you are not able to update or rectify your information on our Website, please contact us. We will use commercially reasonable efforts to accommodate requests to update your information.

7. Objecting to Processing. Automated Decision-Making, Including Profiling. Subject to the conditions of applicable data protection laws you have the right to object to the processing of your personal data. In some instances, you may find that some actions/offers are available for you depending on certain factors accessed by implemented into Website special programs or algorithms, in particular information and data provided by you will be analyzed by special computer programs or algorithms to determine that such information and data are accurate and true. If it is not clear from this Policy, Token Sale Terms and Terms of Service why that happened, please contact us. We will use commercially reasonable efforts to accommodate requests to provide you reasoning of the particular decision.

8. Requesting Removal of Data or Restriction on Processing. In some instances and subject to applicable data protection laws, you may request removal of your data or request to restrict its processing. You may withdraw your consent on processing of your personal data at any time by contacting us at (1) 345-746-3100 or at legal@laneaxis.io. If we do not have clear legal grounds as defined by applicable law not to satisfy your request, we will proceed with it. However, nowadays methods of data processing, in particular using new technologies such as blockchain, may result in impossibility to satisfy your request. You acknowledge that you understand how in particular blockchain technology works and that it may be impossible to amend, delete or restrict to process your data. You have the right to receive all in personal data concerning you which you have provided to the Company in a structured, commonly used and machine-readable format and have the right to transmit those data to another service provider (personal data controller) hindrance. Where this will be technically feasible all said personal data shall be directly transmitted by the Company to another service provider (personal data controller). Please contact us at (1) 345-746-3100 or at legal@laneaxis.io if you need to transmit your personal data to another service provider (personal data controller).

9. International Transfers. ATI and the Website are headquartered in the Cayman Islands. Please be aware that information you provide to us or that we obtain as a result of your use of the Website may be collected in your country and subsequently transferred to another country in accordance with applicable law.

10. Protection of Your Data and Information. Company takes all reasonable security, administrative and technical measures to protect the security of data or information communicated to Company through Website and Services. However, transmission of data or information over the Internet or other public accessible networks is not one hundred percent secure. Company shall not be liable for the security of any data or information you are transmitting over the Internet.

11. Right to Lodge a Complaint. You have the right to lodge a complaint with a supervisory authority.

12. Severability. In the event any provision of this Policy is found to be invalid, illegal, or unenforceable the remaining provisions of this Policy shall nevertheless be binding you with the same effect as though the void and unenforceable part had been severed and deleted.

Contact Us. If you have any questions about this Policy or requests in accordance with its provisions, please contact us at legal@laneaxis.io.