

Privacy Policy



01.09.2018

Thank you for showing interest in our Website <<https://restotoken.org>> (further “the Website”) owned by METROPOLE VENTURES LP (further “the Company”). While visiting the Website is possible without personal data indication, using of services via the Website involves personal data processing. Personal Data protection has a high priority for us. Thus by the means of this Privacy Policy declaration the Company aims to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process and of the rights to which data subjects are entitled.

The processing of personal data takes place in keeping with the EU General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to the Company. If the necessary processing of personal data has no statutory basis, we generally obtain consent from you.

As the controller, we have implemented numerous technical and organizational measures to secure your personal data processed via the Website. However, the transmission of information via the Internet is not completely secure and the Company cannot guarantee the absolute security of personal data transmitted through the Website services.

For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

I. Definitions

The Privacy Policy is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (“GDPR”). To ensure the perspicuity of the Privacy Policy in this part we would like to introduce a number of terms we are going to use.

a) Personal data

“Personal data” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

b) Data subject

Data subject means an identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

c) Data Protection Officers are responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements

d) Controller

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

e) Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

f) Processing

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

g) Restriction of processing

Restriction of processing means the marking of stored personal data with the aim of limiting their processing in the future.

h) Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

i) Pseudonymisation

Pseudonymisation means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

j) Recipient

Recipient means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

k) Third party

Third party means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

l) Consent

Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

II. Name and Address of the controller

Controller for the purposes of the GDPR, other data protection laws applicable in Member States of the European Union and other provisions related to data protection is:

METROPOLE VENTURES LP

Company number LP018193

60 Larchmont Road, Leicester, England, LE4 0BE

support@restotoken.org

III. Name and Address of the Data Protection Officer

The Data Protection Officer of the controller is:

METROPOLE VENTURES LP

Kristine Calaja

60 Larchmont Road, Leicester, England, LE4 0BE

kristine.calaja@protonmail.com

IV. Cookies

The Website uses cookies. The main purpose of a cookie is to identify users and possibly prepare customized Web pages or to save site login information for you. This way the use of cookies serves the Website to provide you more user-friendly services as a matter of convenience.

Cookies are small text files that are stored in user's computer system via an Internet browser. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows the Website to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies using the unique cookie ID.

The next time you go to the Website, your browser will send the cookie to the Web server, so that the Website can remember who you are. This message exchange allows the Web server to use this information to present you with customized Web pages. E.g. you do not

have to enter access data each time the Website is accessed, because this is taken over by the Website, and the cookie is thus stored on the user's computer system.

The data subject may, at any time, prevent the setting of cookies through the Website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. Most browsers have a configuration screen which allows the user to see what cookies have been stored on the computer, and optionally to delete them. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

V. Collection of general data and information

The Website collects a series of general data and information when you or automated system calls up the Website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Website, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

While collecting and using the general data and information, the Company does not draw any conclusions about data subject. This information is needed to (1) provide the Company services, including the Website, and improve them in time, (2) deliver the content of the Website correctly, (2) optimize the content and advertisement of the Website, (3) ensure the long-term viability of our information technology systems and website technology, (4) personalize and manage our relationship with you, including introducing you to products or services that may be of interest to you, (5) investigate, respond to, and manage inquiries or events, and (6) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. The Company analyses anonymously collected data and information statistically to increase the data security and to ensure a certain level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

VI. Legal basis for the processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. If our Company is subject to a legal obligation by which processing of personal data is required,

such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our Company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

VII. Registration on the Website

For registration on the Website the indication of personal data is necessary. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors that also uses personal data for an internal purpose which is attributable to the controller. By registering on the Website, the IP address, date, and time of the registration are also stored. The storage of this data is necessary to secure the Company as controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution. The Company provides information upon request to you as to what personal data are stored about you. Also, we correct or erase personal data at the request or indication of you, insofar as there are no statutory storage obligations. The Data Protection Officer (as indicated in paragraph I.c) is available to you in this respect as contact person.

VIII. Subscription to our newsletter

On the Website users have an opportunity to subscribe to our newsletter. The subscription process also involves the indication of personal data. The input mask used for this purpose determines what personal data are transmitted.

The Company informs a data subject by means of a newsletter about its offers and news. The Company's newsletter may only be received by you if you submit the subscription form with a valid e-mail address used. A confirmation email will be sent to the e-mail address registered by you for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation email is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the

time of the registration, as well as the date and time of the registration. The collection of this data is necessary for understanding the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used for newsletter delivery. In addition, subscribers to the newsletter may be informed by email on the modifications to the newsletter offer or a change in technical circumstances (if any) in order to keep the subscription relevant. There will be no transfer of personal data collected by the newsletter service to third parties. A data subject can terminate the subscription at any time. The consent to the storage of personal data, which you have given while registering the subscription, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is given in each newsletter.

IX. Newsletter-Tracking

The newsletter of the Company contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded into the HTML code of the e-mail to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. By using the embedded tracking pixel, the Company may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analyzed by the Company in order to optimize the shipping of the newsletter and to customize the content of newsletters even better to the interests of the data subject.

These personal data will not be passed on to third parties. You are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, these personal data will be deleted by the controller. The Company automatically regards a withdrawal from the receipt of the newsletter as a revocation.

X. Contact possibility via the website

The Website contains the contact information of the Company, which also includes a general e-mail address. If you contact the Company by e-mail or via a contact form, the personal data transmitted are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. These personal data will not be passed on to third parties.

XI. Routine erasure and blocking of personal data

The Company processes and stores the personal data of the data subjects only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the Company may be subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

XII. Rights of the data subject

a) Right of confirmation

The data subject has the right to obtain from the Company the confirmation as to whether or not personal data concerning you are being processed. If you wish to avail yourself of this right of confirmation, you may, at any time, contact the Data Protection Officer (see paragraph I.c).

b) Right of access

The data subject has the right to obtain from the Company free information about the personal data stored at any time and a copy of this information (including the purpose of processing, categories of personal data concerned, storage period, and more).

The data subject has a right to obtain information as to whether personal data are transferred to a third country or to an international organization. If this is the case, the data subject has the right to be informed of the appropriate safeguards relating to the transfer.

If you wish to avail yourself of this right of access, you may at any time contact the Data Protection Officer (see paragraph I.c).

c) Right to rectification

The data subject has the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement. If you wish to exercise this right to rectification, you may contact the Data Protection Officer (see paragraph I.c).

d) Right to erasure (Right to be forgotten)

The data subject has the right to obtain from the Company the erasure of personal data concerning him or her with undue delay, and the Company has the obligation to erase personal data without undue delay, as long as the processing is no longer necessary. You may at any time contact the Data Protection Officer. The Data Protection Officer shall promptly ensure that the erasure request is complied with immediately.

e) Right of restriction of processing

The data subject has the right to obtain from the Company restriction of processing if the processing is unlawful, if he or her contest the accuracy of your personal data or the personal data is no longer needed by the Company.

If you wish to request the restriction of the processing of personal data stored by the Company, you may at any time contact the Data Protection Officer (see paragraph I.c).

f) Right to data portability

The data subject has the right to receive from the Company, the personal data concerning him or her, in a structured, commonly used and machine-readable format. The data subject has the right to transmit those data to another controller without hindrance from the Company, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

g) Automated individual decision-making, including profiling

The data subject has the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, the Company shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may at any time directly contact our Data Protection Officer.

XIII. Data protection provisions about the application and use of Facebook

On the website, the controller has integrated components of the enterprise Facebook. Facebook is a social network.

A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information. Facebook allows social network users to include the creation of private profiles, upload photos, and network through friend requests.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. If a person lives outside of the United States or Canada, the controller is the Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet website, which is operated by the controller and into which a Facebook component (Facebook plug-ins) was integrated, the web browser on the information technology system of the data subject

is automatically prompted to download display of the corresponding Facebook component from Facebook through the Facebook component. An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugins/>. During the course of this technical procedure, Facebook is made aware of what specific sub-site of our website was visited by the data subject.

If the data subject is logged in at the same time on Facebook, Facebook detects with every call-up to our website by the data subject – and for the entire duration of their stay on our Internet site – which specific sub-site of our Internet page was visited by the data subject. This information is collected through the Facebook component and associated with the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated into our website, e.g. the “Like” button, or if the data subject submits a comment, then Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data.

Facebook always receives, through the Facebook component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook during the time of the call-up to our website. This occurs regardless of whether the data subject clicks on the Facebook component or not. If such a transmission of information to Facebook is not desirable for the data subject, then he or she may prevent this by logging off from their Facebook account before a call-up to our website is made.

The data protection guideline published by Facebook, which is available at <https://facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. In addition, it is explained there what setting options Facebook offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook. These applications may be used by the data subject to eliminate a data transmission to Facebook.

XIV. Data protection provisions about the application and use of Google Analytics

On the Website the component of Google Analytics (with the anonymizer function) is integrated. Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a subpage was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

XV. Period for which the personal data will be stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

XVI. Existence of automated decision-making

We may analyze your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively.

If you wish to exercise your rights stated in paragraph XVI. concerning automated individual decision-making, you may at any time directly contact our Data Protection Officer.