



ASTL.IO PRIVACY POLICY

INTRODUCTION

Welcome to Astol Advanced Limited (Hong Kong) privacy notice. Astol Advanced Limited and its own project ASTL Token respects your privacy and is committed to protect your personal data. This privacy notice informs you about how we care about your personal information when you:

- visit our website <https://astl.io/> or its subdomains (collectively “Website”)
- Complete surveys and subscribe for the newsletters, communicate with our team (“Voluntary provision of data”); and/or use our services and tell you about your privacy rights and how the law protects you.

IMPORTANT INFORMATION

Purpose of this privacy notice

This privacy notice aims to give you information on how Astol Advanced Limited collects and processes your personal data through your use of the Website and/or Services and/or Voluntary provision of data, including any data you may provide and/or we may collect through your use of the Website, the Services and/or when you sign up to our newsletters, complete our surveys and/or communicate with our support service. It is important that you read this privacy notice in conjunction with any other privacy or fair handling notice that we may provide in certain cases where we collect or process personal data about you, so that you are fully aware of how and why we use your data. This privacy notice is in addition to the other notices and is not intended to cancel them. Astol Advanced Limited is responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy notice). Our office is situated at 19H Maxgrand Plaza No.3 Tai Yau Street San Po Kong, Kowloon, Hong Kong.

1. Changes to the privacy notice and your duty to inform us about them

This version was last updated on 20/04/2022. We may update this Privacy policy from time to time. The updated version will be indicated by the date of the last update above. If we make material changes to this privacy policy, we may notify you by posting a notice on the website and/or the Services, or by sending a notice directly to you. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

2. The data we collect about you

Personal data or personal information means any information about a person by which that person can be identified. It does not include data whose identity has been deleted (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows. The information you provide to us: This is your personal information that you provide to us by filling out forms and all KYC information. We may receive information from you by correspondence with you by Telegram channel, e-mail,



Profitable Investment with Confidence

on the website <https://astl.io>. This includes personal data that you enter on our website, provide to us through Services or through Voluntary Provision of Data, or provide to us in any other way. You provide such information when you:

- use our Website and Services
- fill out KYC forms and requests
- subscribe to our newsletters
- fill out a survey
- participate in (sign up to) any contest, promotional activity, giveaway, events, education, career, partnership offers
- communicate with our support service, give us feedback (for example, when you communicate with us by customer support form, e-mail or otherwise).

As a result of these actions, you can provide us with information such as proof of identity in the form of a photo (which will be in the form of a "selfie" in an approved format); date and place of birth (if you are an individual) or date and place of registration or registration (if you are a legal entity) (using <https://astl.io>, you agree not to hide your real location. You agree not to use a VPN, proxy, Tor browser or other methods of hiding your real location); primary citizenship; email address; residential address; confirmation of the current residential address or confirmation of the current address of a registered legal entity (for example, a bank statement, electricity or water bill issued within the last three months), phone number, information about your wallet(s) and crypto tokens that you have, the nature of the origin of tokens or the origin of funds for the purchase of tokens and other data. Data for KYC is provided by contractors providing services in the financial sector. All users are checked for compliance with AML/KYC. If you do not pass the AML/KYC check, you will be refused to work with <https://astl.io>.

Automatic Collection of Information: we receive and store certain types of information automatically whenever you interact with us. As you interact with our Website and/or Services, we may automatically collect technical data about your equipment, browser features, browsing actions and patterns. For example, like many websites, at the Website and Services we use "cookies" and other similar tools and identifiers for analytics and marketing (like web beacons and pixels), and we obtain certain types of information when you access our Website and/or our Services (access log records such as date, IP address, user agent). However, aggregated data is not considered personal data, as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

Information from Other Sources: we might receive information about you from other sources (such as public databases, marketing partners and other third parties) and add it to our account information (this concerns technical data from the following parties: analytics providers such as Google; advertising networks; and search information providers). We will inform you about the source of information and the type of information we have collected about you within a reasonable period after obtaining the personal data, but at the latest within a month.



Profitable Investment with Confidence

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Your consent. We may process your data when you consented for the use of such data by us
- Legitimate Interests. We may process your data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override them. For instance, for provision of Website and Services to you, for the development of business, to procure compliance with our terms and policies. We can also conduct KYC of each user to counter money laundering and terrorist financing
- Legal obligation. Where we need to comply with a legal or regulatory obligation (for example, to comply with applicable law, governmental requests, a judicial proceeding, court order, legal process, enforcement requirements). We may also disclose your information where it is necessary to investigate, prevent or take action regarding potential or suspected fraud, illegal activities, situations involving potential threats to safety.

We are responsible for verifying your identity. For its internal purposes, we have identified all persons (whether an individual or a legal entity) with whom we: (a) establishes or intends to establish business relations with; (b) undertakes or intends to make any transaction with ASTL token or other cryptocurrencies. We undertake to take reasonable measures to verify the identity of the beneficial owners of legal entity, including the main investors and/or controllers of the legal entity, or, if the legal entity is a fund, a party that acts as a fund manager.

4. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for a reason compatible with the original purpose. If we need to use your personal data for a purpose not related to the purposes stipulated here, we will notify you and we will explain the legal basis which allows us to do so.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above. Third Party Service Providers. We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to perform such work (for example, for development and technical support and maintenance of the Website and Services, organizing of promotional and marketing activities, data analysis, email delivery, hosting services, customer service). Business Transfers. Third Parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.



Profitable Investment with Confidence

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

6. Affiliates

We may share your information with our affiliates (including parties that we control, controlled by or under common control with us). We require all third parties to respect the security of your personal data and to treat it in accordance with the law and this Privacy Policy. We do not allow our third-party service providers to use your personal data for their own purposes, share it with third parties and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

Please note that your information may be transferred, stored and processed by us and by those third parties with whom we may share your information in various countries, including outside Hong Kong. These countries may have less stringent privacy laws than we do, so any information they hold can become subject to their laws and disclosure requirements, including disclosure to governmental bodies, regulatory agencies and private persons. In addition, a number of countries have agreements under which information exchanged with other countries for law enforcement, tax and other purposes. We will however take all necessary measures to protect your personal information in accordance with this Privacy policy and applicable law and require all our contractors to follow the same rules when processing your personal data.

8. Data security

We have put in place appropriate technical and organizational security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do. However, please remember that the transmission of data over the Internet (including e-mail) is never completely secure. Therefore, while we use appropriate measures to try to protect your personal data, we cannot guarantee the security of the data transmitted to us or by us. You must access the Website and Services and/or otherwise transmit your data in a secure environment.

9. Data retention

We will only retain your personal data for as long as is necessary to achieve the purposes for which we collected it, unless a longer retention period is required or permitted by law (for example, any legal, accounting or reporting requirements). When we do not have an ongoing legitimate business need to process your personal information, we will either delete it or anonymize it, or, if this is not possible (for example, if your data is stored in backup systems),



Profitable Investment with Confidence

we will securely store it until it is deleted. If in some circumstances we anonymize your personal data (so that they can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice.

10. Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- request access to your personal data
- request correction of your personal data
- request erasure of your personal data
- object to or restrict processing of your personal data
- request restriction of processing your personal data
- request transfer of your personal data (data portability)
- right to withdraw consent

If we are relying on your consent to process your personal data you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide you with certain services. We will inform you about it when you withdraw your consent. Please note that under certain circumstances it may be lawful for us to continue processing your information even if you have withdrawn your consent if one of the other legal grounds applies. No fee usually required. You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

11. Third-party links

The Website, Services and means of Voluntary provision of data may include links to third-party websites and services, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and services and are not responsible for their privacy statements. When you leave the Website and/or Services and/or use means of Voluntary provision of data ran/built on or hosted by third-party services, we encourage you to read the privacy notice of every third-party website and service you visit.

12. Cookies

We may use cookies and similar tracking technologies (like web beacons and pixels) to access and store information. You can set your browser to refuse all or some browser cookies, or to alert you when the Website or Services set or access cookies. If you disable or refuse cookies, please note that some parts of the Website or Services may become inaccessible or not function properly.

13. Contact us

If you have questions or comments about this Privacy Policy or the handling of your personal data by us, email us at: info@astl.io.