

Privacy Policy

VEGA Investment Group Limited, a company incorporated in the British Virgin Islands with company number 2100681 (“**VEGA**”, “**we**”, “**us**”, or “**our**”) recognizes the importance of protecting your personal data. This Privacy Policy sets out how we collect, use, disclose and manage (collectively referred to as “**process**” or “**processing**”) your personal data, whether the collection is taking place via our websites, mobile applications, any other online platforms, or physically. (“**Services**”).

This Privacy Policy apply to all visitors, users, or others who access to the Services (“**User**”, “**You**”).

"**Personal Data**" means any data that identifies you as an individual or relates to an identifiable individual, including but not limited to your name, address, email address, phone number, IP address, transaction history, and preferences, but not including the information of the deceased persons

1. Overview of Privacy Policy

This Privacy Policy covers the following issues:

- What kind of Personal Data we collect
- How we collect your Personal Data
- Why we process your Personal Data
- Whom we share and disclose your Personal Data with
- How long we retain your personal data
- Your privacy rights and how you can exercise them
- How we protect your Personal Data
- Changes to this Privacy Policy
- How to contact us

2. What kind of Personal Data we collect

VEGA may collect and process personal data including:

- Contact information (including names, postal addresses, email addresses, and telephone numbers)
- Account information (including log-in details, blockchain wallet address, email addresses, and other information provided through your account);
- Payment Information (including payment history through our services)
- Any other personal information you provide to us, including when you choose to participate in competitions, events, and any activities relating to our Services, when you answer questions during a conversation or in a survey. This may include information you submit to us through “Contact Us” or similar features, whether online or offline; and
- Information collected by cookies and similar technologies, including IP address. This type of collection takes place while you are using online platforms.
- Service Use Data: interaction with our Service, the webpage, your web or application request, pages of our websites that you visit, information you search for via our Service, access times and dates, and other similar information.
- Public Information Observed from Blockchains: We collect data from activity that is publicly visible and/or accessible on blockchains. This may include blockchain addresses and information regarding purchases, sales, or transfers of digital tokens, which may then be associated with other data you have provided to us

3. How we collect your personal data

VEGA collects your Personal Data from a variety of sources including, but not limited to:

- We may directly collect your Personal Data if you provide it to us, or when you register a user account, or connect your blockchain wallet to use our services, participate in a survey, contest, or promotional event or during the course of use of our Services.
- We may also collect your personal data from other sources, including open-source material, our business partners, third parties connected to the data subject (for example, another service provider who provides services to you).

- We may also use technology to collect your Personal Data. As you navigate through and interact with our Service, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:
 - Log Files: Log information is data about your use of the Service, such as IP address, browser type, internet service provider, referring/exit pages, operating system, date/time stamps, and related data, which is stored in log files.
 - Cookies: A cookie is a small data file transferred to your computer (or other device) when it is used to access our Service. Cookies may be used for many purposes, including to enable certain features of our Service and remember your preferences, to better understand how you interact with our Service, to provide you advertising on and off the Service, and to monitor usage by visitors and online traffic routing. You may be able to instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the online services you visit.
 - Web Beacons (“Tracking Pixels): Web beacons are small graphic images, also known as “internet tags” or “clear gifs,” embedded in web pages and e-mail messages. Web beacons are used in combination with cookies for various purposes, including to allow us to count the number of visitors to the Service, to monitor how users navigate the Service, to count content views, and to provide you advertising.
 - Embedded Scripts: An embedded script is programming code designed to collect information about your interactions with the Service. It is temporarily downloaded onto your device from our web server or a third party with whom we work, is active only while you are connected to the Service and deleted or deactivated thereafter.
 - Location-identifying Technologies: GPS (global positioning systems) software, geo-filtering, and other location-aware technologies locate (sometimes precisely) you for purposes such as verifying your location and delivering or restricting relevant content based on your location.

4. Why we process your Personal Data

VEGA generally processes your Personal Data for the following purpose:

- To provide our services to you and help you access services such as the use of strictly necessary cookies;
- To verify and authenticate identity of user and monitor illegal use of Service;
- To contact you in relation to any competition, contest, events, surveys you may have entered into with us;
- To respond to your requests or complaints;
- To comply with our legal obligations such as financial reporting requirements imposed by our auditors and/or government authorities, and to cooperate with law enforcement agencies, government authorities, regulators and/or a court order in connection with proceedings or investigations;
- To analyze and survey our activities (interactions with customers, sales, number of complaints);
- For purchases, payments, or delivery of services or rewards whether physical or virtual or
- For other purposes as we may notify you when we request your consent for collecting your Personal Data such as, but not limited to the use of functional cookies and targeting cookies:
 - to learn about online or offline activities that are relevant and interesting to you as well as targeting our marketing to benefit you
 - to improve the quality of our website, platform, interactions and services.
 - To send you updates about our services;

We may also process your Personal Data for other purposes if we have obtained your consent, or the processing is permitted or required by laws, including

- (i) to comply with our legal obligations;
- (ii) to prevent or suppress a danger to life, body, health of a person;
- (iii) to perform a task carried out in the public interest or in the exercise of official authority;
- (iv) for legitimate interests pursued by VEGA or by third parties with the reasonable necessity and User’s expectations. (For example, to sell any part of our business or its assets or to enable the acquisition of our businesses or assets, in whole or in part, by third parties, to prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture, and networks).

Notwithstanding the foregoing, we may use anonymized data for any purpose without your consent.

5. Whom we share and disclose your Personal Data with

VEGA will not share, sell, or otherwise disclose your Personal Data to third parties without your consent, except as permitted or required by law and to the extent the disclosure serves the purposes as abovementioned.

In the course of our business activities and to fulfill the purposes, your personal data may be disclosed or transferred either in, or outside the British Virgin Islands, to the potential recipients (in each case including its respective employees, agents and directors) as follows:

- Our affiliated companies, including but not limited to, T&B Media Global (Thailand) Co. Ltd, VUCA Digital Limited, and VUCA Digital Co. Ltd.
- Our suppliers or service providers (such as IT systems providers, marketing service providers cloud service providers, database providers and consultants providing services in relation to any matter on which VEGA instructs them), where disclosure to that provider of services is considered necessary to fulfill the purposes set out above;
- Our business partners who offer services jointly with us;
- Potential parties with whom VEGA intends to merge or to sell in whole or in part of VEGA; or
- Government authorities or government officers by virtue of the provisions of specific laws to maintain the stability of the state, or to maintain public order or good morals, and fully comply with the procedures as prescribed by such laws.

Where VEGA discloses or transfers Personal Data to any third parties, VEGA will enter into an agreement with the third party setting out the respective obligations of each party in place to protect Personal Data against unauthorized or accidental use, access, disclosure, damage, loss, or destruction.

6. How long we retain your personal data

We will only retain the Personal Data for as long as you continue to use the Service, or for as long as necessary to fulfill the purposes (as set out above) for which we collected it, and to the extent permitted by relevant data protection laws or other applicable laws. We may continue to retain your Personal Data even after you cease to use the Service if such retention is reasonably necessary to comply with our legal obligations, to resolve disputes, prevent fraud and abuse, enforce our Terms and Conditions or other agreements, and/or protect our legitimate interests.

We have prepared schedules to specify the appropriate retention periods, generally for two years, to ensure that when we no longer need to use your Personal Data we will remove it from our systems and records and/or take steps to anonymize it so that you can no longer be identified from it.

7. Your privacy rights and how you can exercise them

Under the relevant data protection law, you have the following rights that you may exercise in relation to your Personal Data processed by us. You may make a request to exercise any of these rights regarding your Personal Data within legal requirements and policies/ regulations currently in force or as amended in the future. If you are not of legal age in your country or have a limited legal capacity, your father, mother, guardian or legal representative may request to exercise the right on your behalf.

- The right to request receipt of a copy of your Personal Data processed by us and to obtain other information about how we collect/process your Personal Data and why we process your Personal Data. Your Personal Data will generally be provided to you in electronic form.
- The right to request the rectification of inaccurate, incomplete, or misleading Personal Data relating to you.
- The right to request the erasure, destruction, anonymization of your Personal Data.
- The right to request to restrict the processing of your Personal Data. You have right to request us to restrict the use of your Personal Data when we are in the process of reviewing your request to correct your Personal

Data or your objection, as well as in any other event where you request the restriction of the use of your Personal Data instead of deleting or destroying the Personal Data that is no longer necessary.

- The right to data portability: You have the right to request receipt of your Personal Data that we have arranged it in the format which is readable or used by ways of automatic tools or equipment and can be used or disclosed by automate means. You are also entitled to request us to directly send or transfer your Personal Data in such format to other data controller unless it cannot be done due to technical reasons.
- The right to object to any processing which is based on legitimate purposes or other legal grounds.
- The right to withdraw your consent: If you have given us consent to collect, use and/or disclose your Personal Data (whether before or after the effective date of relevant applicable personal data protection law), you have right to withdraw your consent at any time throughout the period your Personal Data available to us. The withdrawal must be made according to the format that we have set unless there is a legal restriction to the right or you are still under beneficial contract. However, even after you have withdrawn your consent, we may continue processing your Personal Data based on another legal basis.

Withdrawal of your consent will not affect the collection, use or disclosure of your Personal Data that we have done according to your given consent. The withdrawal may affect your use of our Services. For example, you may not receive privileges, promotions, news, services that are enhanced and consistent with your needs or not you may no longer able to use our Services. Therefore, after we receive you request to withdraw the consent, we will notify you the potential consequences of withdrawing your consent for you to reconsider your withdrawal.

- Right to lodge a complaint: You also have the right to lodge a complaint to the data protection authorities if your request is rejected and you are dissatisfied with our reasons or the response is not provided to you within the period and if you believe that the collection, use and/or disclosure of your Personal Data is violating or not in compliance with relevant laws.

If you would like to exercise your rights, ask questions, or file a complaint about unlawful processing, you may send your request by emailing to info@crowntoken.io. We will require you to identify yourself before attending your request. Any request made pursuant to the rights as described above must be made in writing. Please provide as clear details and circumstances surrounding your request relating to the Personal Data. We will use our best effort to take action and clarify within 30 days or not exceeding the period specified by law.

The exercise of rights listed above may be restricted under relevant laws and it may be necessary for us to deny or not be able to carry out your requests such as to comply with laws or court orders, public tasks, or there is an overriding interest for us to retain and processing Personal Data to protect rights and freedoms of others. If we deny the request, we will inform you of the reason.

8. How we protect your personal data

We care about the security of your information and use physical, administrative, and technological safeguards to preserve the integrity and security of information collected through our Service. However, no security system is impenetrable and we cannot guarantee the security of our systems. We have implemented (has required third parties to implement) appropriate technical and physical measures to safeguard and protect personal data from unauthorized or unlawful processing and against accidental or unlawful destruction, loss or alteration or damage, unauthorized disclosure of, or access to, personal data.

You are also responsible for the security of your digital wallet, and we urge you to take steps to ensure it is and remains secure. If you discover an issue related to your wallet, please contact your wallet provider.

9. Storage and Transfer of Personal Data outside the British Virgin Islands

Your Personal Data may be stored or transferred outside of the British Virgin Islands. We take appropriate steps to ensure that recipients of your Personal Data such as service providers and our foreign affiliated companies are bound to duties of confidentiality and we implement measures such as appropriate contractual clauses to ensure that the recipients of such transfer protect and treat your Personal Data in accordance with all applicable personal data protection laws.

10. Additional provisions for EU users only

The provisions in this Section only apply if you are a user who is located in the European Union (“EU”). We will endeavor to further comply with the provisions of the General Data Protection Regulation (EU) 2016/679 (the “GDPR”) in regards to collecting, processing, using and/ disclosing your Personal Data. These provisions take precedence over any inconsistent provisions in the remainder of this Privacy Policy.

10.1 Portability

You have the right to obtain from us the Personal Data that you have previously provided to us, and which we process on the basis of your consent in a structured, commonly used and machine-readable format and a right to request that we transfer such Personal Data to another party. If you wish for us to transfer the Personal Data to another party, please ensure you detail that party and note that we can only do so where it is technically feasible. We are not responsible for the security of the Personal Data or its processing once received by the third party. We also may not provide you with certain Personal Data if providing it would interfere with another’s rights (e.g. where providing the Personal Data we hold about you would reveal information about another person).

10.2. Erasure

You may request that we erase the Personal Data we hold about you in the following circumstances:

1. You believe that it is no longer necessary for us to hold the Personal Data we hold about you;
2. We are processing the Personal Data we hold about you on the basis of your consent, and you wish to withdraw your consent and there is no other ground under which we can process the Personal Data;
3. We are processing the Personal Data we hold about you on the basis of our legitimate interest and you object to such processing. Please provide us with detail as to your reasoning so that we can assess whether there is an overriding interest for us to process and retain such Personal Data;
4. You no longer wish us to use the Personal Data we hold about you in order to send you promotions, special offers, marketing and lucky draws; or
5. You believe the Personal Data we hold about you is being unlawfully processed by us

Please provide as much detail as possible on your reasons for the request to assist us in determining whether you have a valid basis for erasure. However, we may retain the Personal Data if there are valid grounds under law for us to do so (e.g., for the defense of legal claims or freedom of expression) but we will let you know if that is the case. Please note that after deleting the Personal Data, we may not be able to provide the same level of servicing to you as we will not be aware of your preferences.

10.3 Retention of Personal Data

We retain your Personal Data as long as needed to provide services or products to you, or as required or permitted by applicable laws, such as tax and accounting laws. If you make a request for erasure of your Personal Data and we determine that there is a valid basis for your request, we will endeavor to erase the Personal Data within 30 days of your request, or inform you if it will take longer.

10.4. Objection against Profiling and Direct Marketing

At any time, you have the right to object to our processing of Personal Data about you in order to send you promotions, special offers and marketing messages, including where we build profiles for such purposes and we will stop processing the Personal Data for that purpose. Please provide as much detail as possible on your reasons for the request to assist us in determining whether you have a valid basis for objection. However, we may retain the Personal Data if there are valid grounds under law for us to do so.

10.5. Restriction of Processing to Storage Only

You have a right to request that we restrict the processing of the Personal Data we hold about you to storage purposes only, where;

1. You believe the Personal Data is not accurate, for the period it takes for us to verify whether the Personal Data is accurate;
2. We wish to erase the Personal Data but you want us to just store it instead;
3. We wish to erase the Personal Data as it is no longer necessary for our purposes but you require it to be stored for the establishment, exercise or defense of legal claims; or
4. you have objected to us processing Personal Data we hold about you on the basis of our legitimate interest and you wish us to stop processing the Personal Data whilst we determine whether there is an overriding interest in us processing and retaining such Personal Data.

10.6. Information on children

The Services are not intended for children under the age of 16 who are located in the EU. We do not knowingly collect or maintain any personal data or non-personally-identifiable information from anyone under the age of 16 who is located in the EU, nor is any part of our Website, Games or other services directed to children under the age of 16 who are located in the EU. We will close any accounts used exclusively by such children and will remove and/or delete any Personal Data we believe was submitted by any child under the age of 16 who is located in the EU.

11. Changes to this privacy policy

We reserve the right to update this Privacy Policy for any reason, including but not limited to complying with relevant laws of the British Virgin Islands, government policy, regulatory and other obligations of a similar nature. Any updates will appear on our website at <https://crowntoken.io/>. Any changes to this Privacy Policy will become effective upon publishing the Privacy Policy or such other date as we may specify.

12. How to contact us

If you have any questions relating to this Privacy Policy or would like to exercise your rights, you may contact us at the following email address:

info@crowntoken.io