

Privacy Policy

Last updated: Oct 24, 2018

This is our data privacy policy. It describes how and when we collect your information, and what we do with it. We're guided by two fundamental principles:

- **Transparency.** You should know exactly what data is collected and what we do with it. That includes making sure our privacy policy sounds like people wrote it, not robot lawyers. Let us know if our policy is unclear or difficult to understand at info@twilight-coin.io
- **Control.** You control what we do with your data. You decide when or if we receive any personally identifying information. You get to opt in to any third-party marketing. You can configure your browser to not accept cookies from our website. You can ask us to delete your account and information.

1. About Our Privacy Policy

This Privacy Policy describes how Twilight-coin.io and our operating company, Twilight Studio Inc., collect, use, store, share, and protect your information whenever you use any Twilight-coin.io platform ("TWC platform") and any related applications. It applies whenever you use one of the many products and services we're building for you, even the ones that might exist in the future.

By using the Twilight-coin.io Website and TWC Platform, you consent and opt in to the data practices prescribed in this statement. We'll post this Privacy Policy in a prominent place on our Website, and we'll let you know when we make major changes or when we're required to do so by law. Since we may make changes, we do encourage you to review this page frequently, and it's your responsibility to know what it says.

If you read this policy and disagree with it, you shouldn't use Twilight-coin.io's Website or TWC Platform.

We post the Twilight-coin.io Privacy Policy to inform you and/or your organization (for the purposes of the policy, that's who we mean when we say "you" or "your," but you probably assumed that) as a visitor to the Twilight-coin.io Website or a user of the TWC Platform, what kinds of information we may gather about you, how we may use that information, whether we disclose it to anyone, the choices you have regarding our use of

information, and your ability to correct or ask us to delete that information. By accessing the Twilight-coin.io Website or the TWC Platform, you are consenting (i) to this Privacy Policy and (ii) to having your personal data transferred to and/or processed in Japan, and any other countries where our marketing partner, consulting partner, and KYC provider exists in accordance with the terms of this Privacy Policy. Twilight-coin.io collects all data entered through <https://twilight-coin.io/> and is responsible for implementing and ensuring compliance with this Privacy Policy.

2. How We Get Your Information

There are three main ways we get your information:

1. You give it to us.
2. We get it from others (we'll tell you how and why)
3. Information we automatically collect (this won't include personally identifying information)

3. What Happens if You Visit Our Website:

3.1. When you visit the Twilight-coin.io Website, we do not collect personally identifiable information about you except when you specifically and knowingly provide it to us, through the KYC process or membership sign-up form (see the Member Information section below), for example, or when you communicate with customer service, or reply to our emails, or when you transact business on our Platform. This is information you give us.

3.2 When you visit the Twilight-coin.io Website, we collect information sent to us through your computer, mobile phone, or other access device. This information may include your IP address, device information like your identifier, device name and type, operating system, location, mobile network information, and standard web log information, such as your browser type, traffic to and from our site, and the pages you accessed on our website. This information is used in operational statistics, for protecting against information security attacks within technology owned by Twilight-coin.io or through security services we utilize from other companies, and to protect against attempts to access or commit fraud. Twilight-coin.io does not intentionally collect information from or about any individual who is under 13 years old. This is information we automatically collect. If any of this information constitutes personally identifiable information when combined with other information we hold (IP address and location sometimes can, for example), we will treat it the same way we treat the rest of your personally identifying information. We won't

collect any of the information you give us automatically as you browse our site.

3.3 Like many websites, the Twilight-coin.io Website uses cookies, small text files which are placed on your computer to allow us to provide you with a customized experience. A cookie cannot read personal data off your hard disk or read cookie files created by other websites; the only personal information a cookie can contain is information you supply yourself. These cookies are destroyed when you log out and cannot be used to track other information. You may browse most of the Twilight-coin.io Website without accepting cookies; however, some functionality may be lost by disabling cookies on your computer. Most web browsers automatically accept cookies, but you may change your web browser settings to prevent automatic acceptance of cookies or to notify you when a cookie is set.

Any member visiting Twilight-coin.io web properties will be presented with an informational prompt that outlines what we do with the cookies. This may include tracking computer source to provide location-based membership service, as well as assigning you to a certain regional Twilight-coin.io entity. We will never share these cookies with third parties for marketing purposes.

3.4 We are committed to providing reasonable and practical access to you to identify and to correct any inaccuracies in the information you may provide. Visitors who have provided personal information on our Website can contact us at info@twilight-coin.io to correct any inaccuracies.

3.5 We are committed to respecting our visitors' and members' rights to have their information deleted from our systems. If you ask us to delete your information, we will honor that request for any information other than the exception in 1.7 below.

3.6 If you have opened a support ticket or have directly emailed our customer support department, any information contained within your request will be retained within our systems for the duration specified in our data retention policy, which is a minimum of two years.

4. Information You Provide Us Through Your Member Application

4.1 If you choose to apply for membership to the TWC Platform, you may be asked to provide the following types of information:

- Contact information - your name, address, phone, email, and other similar information;
- Proof of Identity;
 - For individuals - Unexpired government-issued identification evidencing nationality or residence and bearing a photograph or similar safeguard, such as a driver's license or passport
 - For non-individuals (legal entities like corporations and LLCs)- Documents showing the existence of the entity which can include certified articles of incorporation, a government-issued business license, a partnership agreement, or trust instrument.
- Proof of address: A recent utility bill, local authority tax bill, institution statement containing the individual or entity name, address and dated less than 3 months ago.
- Additional information to verify your identity or address, and/or to manage risk, including your date of birth, taxpayer or government identification number, or other personal information.

The information we need to verify your identity could always change based on new legal requirements, but this is information you can choose to provide or not provide. If you're uncomfortable with us having any of this information, contact us at info@twilight-coin.io, or decline to join our Platform.

It's important you know that we collect this information to satisfy our legal obligation to "Know Your Customer" (KYC). We don't collect this information because we want to profit from your information, or share it around—we collect it because it's the only way to operate a legal, reputable, valuable Platform in many different global jurisdictions. It's also how we attempt to ensure only good actors access our Platform.

This all falls under the category of information you give us.

We may also obtain information about you from third parties such as identity verification services. This is part of our legal obligation to conduct a due diligence review to ensure you are who you say you are before we allow you to transact on the Platform. We will not perform a soft or hard "credit check" using this information without your consent. This is information we get from others.

5. Uses of Information

Now that you know how and why we collect your information, here are our rules on what

we do with it, and information about how you can help us protect it, and how you can exercise your right to control it.

5.1 Passwords and identity or security devices are private entry keys into the respective Twilight-coin.io account. A user should never share his or her password or identity or security devices with anyone. If a user needs to walk away from his or her personal computing device (PC) for any reason, the user should log off from the Twilight-coin.io session. Users should select passwords that are difficult to guess and change them frequently. Passwords should not be stored on the PC or on written notes near the PC. Identity or security devices should be stored in a secure place. Twilight-coin.io is not responsible if you don't follow these security procedures. You should also remember that Twilight-coin.io will never ask you for your password or private key via email or social media. You can contact our support organization at info@twilight-coin.io if you ever have a concern about your security or the security of the TWC platform(s).

5.2 We will use the information you give us to contact you, if necessary, to service your account or for other administrative purposes. We may also access and use your information to resolve disputes, to troubleshoot problems, or for direct marketing from Twilight-coin.io (not from third parties). In addition, the TWC Platform may use your transaction details to automate and to streamline your transactions by checking for electronic data compliance, providing reporting features, identifying risky transactions, and transferring data from previous forms to those of the current transaction. We will not provide your personally identifiable information to any third parties unless we must do so to fulfill a legal obligation.

6. How We Protect and Store Your Information

6.1 Throughout this policy, we use the term "personally identifiable information" to describe information that can be associated with a specific person and can be used to identify that person. This Privacy Policy does not apply to personal information that has been anonymized so that it does not and cannot be used to identify a specific user. Twilight-coin.io takes reasonable precautions, as we will describe below, to protect your personal information from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

6.2 We store and process your personal and transactional information on our computers in Japan, EU, United States, and elsewhere in the world where Twilight-coin.io facilities or our service providers are located, and we protect it by maintaining physical, electronic,

and procedural safeguards in compliance with applicable Japan, EU and U.S. federal and state regulations. We use computer safeguards such as firewalls and data encryption, we enforce physical and logical access controls to our buildings and files, and we authorize access to personal information only for those employees who require it to fulfill their job responsibilities.

6.3 We store our customers' personal information securely throughout the life of the customer's Twilight-coin.io Account. Twilight-coin.io will retain your personal information for the life of your account plus a minimum of seven years; or as necessary to comply with our legal obligations or to resolve disputes.

7. Who We Share Your Information With, and Why

7.1 We may share your personal information with third party identity verification services in order to prevent fraud, and to comply with our “Know Your Customer,” “Anti-Money Laundering,” and other similar legal responsibilities. This allows Twilight-coin.io to confirm your identity by comparing the information you provide us to public records and other third-party databases. These service providers may create derivative data based on your personal information that can be used solely in connection with provision of identity verification and fraud prevention services. We do not provide your personal information to those third parties for marketing purposes, nor are they contractually allowed to use it for marketing.

7.2 We may share your personal information with service providers under contract who help with parts of our business operations such as marketing, consulting, and technology services. Our contracts require these service providers to only use your information in connection with the services they perform for us, and prohibit them from selling your information to anyone else. This information will not be used by those third parties for marketing purposes.

7.3 We may share your personal information with companies or other entities that we plan to merge with or be acquired by. Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. You will receive prior notice of any change in applicable policy.

7.4 We may share your personal information with companies or other entities that purchase Twilight-coin.io assets.

7.5 We may share your personal information with government entities, law enforcement, and officials, or other third parties when (a) we are compelled to do so by a subpoena, court order, or similar legal procedure; or (b) we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss (c) to report suspected illegal activity.

7.6 We may share your personal information with other third parties with your consent or direction to do so. You would have to opt in to this disclosure.

7.7 Before Twilight-coin.io shares your information with any third party that is not acting as an agent to perform tasks on behalf of and under the instructions of Twilight-coin.io, Twilight-coin.io will enter into a written agreement requiring that the third party provide at least the same level of privacy protection as we require.

8. Miscellaneous

8.1 Twilight-coin.io reserves the right to change this Privacy Policy, or any other Twilight-coin.io policy or practice, at any time. You are responsible for checking this page periodically for changes. When we intend to make material changes to this Privacy Policy, we will post those changes on this page and such changes are effective immediately upon posting. Your continued use of the Twilight-coin.io service following any posted change(s) to the Privacy Policy will be deemed an acceptance of such change(s).

8.2 You can always ask to view all information we have stored related to your Member account. We will respond to your request to access, update or delete Member information as soon as we can after you provide such updates to Twilight-coin.io Member Services at info@twilight-coin.io.

5.3 Twilight-coin.io takes reasonable precautions to protect your Basic Information information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Due to the inherent nature of the Internet as an open global communications vehicle, Twilight-coin.io cannot guarantee that your information will be absolutely safe from intrusion by others, such as hackers. Any unauthorized access to or use of the Twilight-coin.io Website or the TWC Platform or information collected and maintained by Twilight-coin.io should be immediately brought to the attention of Twilight-coin.io Member Services at info@twilight-coin.io. Twilight-coin.io will investigate, and if necessary take action to prevent or halt, any violation of this Privacy Policy of which it becomes aware. If you contact Twilight-coin.io by e-mail, you should be aware that e-

mail transmission might not be secure. A third party could view information you send by e-mail in transit. Twilight-coin.io will have no liability for disclosure of your information due to errors or unauthorized acts of third parties during transmission.

You may also contact Twilight-coin.io by writing to Twilight Studio Inc. (Operating company) at 5-39-11-102 Honcho, Koganei-shi, Tokyo, 184-0004 Japan.

8.4 In the event that Twilight-coin.io, or substantially all of its assets, are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, such databases containing Member information may be one of the transferred assets. In using the Twilight-coin.io Website and the TWC Platform, you consent to such transfer of your information.

8.5 Other Important Information

You agree that personal information collected on our Site may be stored and processed in the EU, United States or any other country in which Twilight-coin.io, its affiliates, partners, service providers, or agents maintain facilities, and while in such jurisdictions may be subject to access pursuant to the laws of those jurisdictions. Each of these countries has different privacy laws that afford varying levels of protection for your personal information, and such laws may be less stringent or may not be as comprehensive as those laws that exist in your country. By using our Site, you consent to Twilight-coin.io's transmission and processing of your personal information in any jurisdiction in which we operate, in accordance with this Privacy Policy.

Oct 24, 2018

Twilight-coin.io

E-mail: info@twilight-coin.io