

Privacy Policy

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Protecting your privacy is really important to us. We're providing this Privacy Policy ("Policy") to explain our practices regarding the collection, use and disclosure of information that we process in the course of our business. We regularly review our compliance with this Privacy Policy and may revise this Policy from time to time.

1. What is personal data

According to Article 4 of the General Data Protection Regulation (GDPR)

'personal data' means any information relating to an identified or identifiable natural person ('data subject')

'Personal data' and 'personal information' are used interchangeably in this document.

Our Clients are 'data subjects' in terms of GDPR.

2. Who we are

We are **Sky Way Capital Inc.**, a company incorporated under the laws of Saint Lucia, registered under IBC No. 2018- 00309, whose registered office is at Rodney Bayside Building, Rodney Bay, Gros-Islet, LC01 601, Saint Lucia. The company acts both as the Controller and the Processor of personal data.

3. What we do

Our main goal is to support and develop the SKYWAY project with the help of crowdfunding. To achieve this goal, we provide information relating to the project, publish news, educate, conduct webinars, organize public events, provide technical and informational support, and help our Clients to invest in the project.

We only use the personal information for the purposes stated in this Policy. We share the Client's personal information with the third parties only if it's needed to perform our services and only after the Client has explicitly expressed their consent.

We neither collect nor process special categories of personal data (as defined in Article 9 GDPR).

4. How to contact us

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to:

PrivacyPolicy@skyway.capital

Our data protection officer (DPO) can be reached via this email address:

dpo@skyway.capital

5. Voluntary nature of data provision

There's no obligation for a Client to share their personal information with the Company. However, we cannot provide some of our services until such information is shared.

6. Types of personal data

We classify our Client's personal information into three main types:

6.1 Directly collected information (D)

This refers to the information which a Client directly provides himself (e.g. by filling the website forms).

6.2 Indirectly collected information (I)

This kind of information relates to the Client but he does not provide it directly (e.g. an IP address).

6.3 Automatically generated information (A)

This type of information is generated automatically by the system. Though such information isn't provided by the Client himself it relates to him and according to the Article 4 (1) of the GDPR is considered to be personal data. It has 2 subtypes:

- static A (SA). This information doesn't usually change once it's created. An internal user id is an example.
- dynamic A (DA). This subtype changes accordingly to the actions performed by the Client.

We use these abbreviations below to address different types of personal information: D, I, SA, and DA.

7. What information we collect, when, and why

There are several points in the 'Company-Client' relationship at which personal information is collected:

7.1. Sign Up (Registration) - Step 1

When a Client first signs up the following information is requested or assigned:

#	Personal Data	Type	Purpose
7.1.01	First name	D	to identify a Client
7.1.02	Phone number	D	used for notifications and security confirmations
7.1.03	Email address	D	used for notifications and alerts, serves as a login
7.1.04	IP address	I	security (log-in history)

7.1.05	Language	I	to communicate with the Client on his/her language
7.1.06	Internal user id	AS	to indentify a Client in the system
7.1.07	Date of the registration	AS	used for statistics
7.1.08	Verification indicator	AD	for internal use
7.1.09	Status	AD	system status indicating the level of involvement
7.1.10	Inviter's first/last name	AS	(if any) used for referral structure

7.2. First Log In

After the first step of the registration a Client is automatically logged in and is requested to provide the following information:

#	Personal Data	Type	Purpose
7.2.01	Citizenship	D	used for statistics
7.2.02	Host country	D	
7.2.03	Host city	D	

7.3 Sign Up (Registration) - Step 2

When the first step of the registration is completed, a confirmation email is sent to the address (7.1.03). After following the link in the email the Client is logged in to his personal profile and is requested to provide the following data:

#	Personal Data	Type	Purpose / Comments
7.3.01	First name	D	is preset by 7.1.01, can be edited, replaces 7.1.01
7.3.02	Last name	D	to identify a Client
7.3.03	Phone number	D	is preset by 7.1.02, can be edited, replaces 7.1.02

7.4. Verification

Verification is an important step because most information collected will be handed over to the share register of Euroasian Rail Skyway Systems Ltd. (a company incorporated in British Virgin Islands with company registration number 08745295 and whose registered office address is Suite 2, 23-24 Great James Street, London, England, WC1N 3ES).

This information includes:

#	Personal Data	Type
7.4.01	First name	D
7.4.02	Last name	D
7.4.03	Date of birth	D
7.4.04	Country of birth	D
7.4.05	Gender	D
7.4.06	ID	D
7.4.07	ID scans (photo included)	D
7.4.08	Address	D
7.4.09	Residence confirmation	D

7.4.01, 7.4.02 update and replace 7.3.01, 7.3.02 respectively. All this information is required to successfully complete verification process.

7.5. Investment

When a Client decides to invest in the SKYWAY project no additional information is required but the following information relating to that client appears (or is updated) in our database:

#	Personal Data	Type
7.5.01	Overall amount of investments	AD

This information is mostly used for statistics.

7.6 Registration of shares

At any moment after the investment a Client can request for his shares to be registered and at the same time a corresponding certificate is issued:

#	Personal Data	Type
7.6.01	Certificate number	AS

7.6.02	Shares' range	AS
7.6.03	Number of shares	AS

all three are used as a confirmation of the Client's investment. With each new registration of shares there appears a new set of these data.

7.7. Certificate Delivery

If a Client requests a hard copy of the certificate to be delivered to him and his current address differs from 7.4.08 we may additionally request:

#	Personal Data	Type
7.7.01	Client's current address	D

to deliver a hard copy of the certificate. This information is not saved, only shared once with a third party (see 9.1).

7.8. Parental responsibility

When a Client wants to register a child and invest on their behalf they are obliged to provide the documents proving that they are entitled to do so:

#	Personal Data	Type
7.8.01	Parental responsibility holder confirmation	D

The Company doesn't provide direct services to minors.

7.9. Additional information

A Client can optionally share additional contact information:

#	Personal Data	Type
7.9.01	Additional phone number	D
7.9.02	Skype account	D
7.9.03	Additional email address	D

This information is not transferred anywhere and is used solely as extra communication options. The additional email address may also be used for security notifications (when a login into the Client's account is performed).

8. Lawfulness of Processing

When a Client is ready to invest in the SKYWAY project he is to sign a "*Convertible Note Agreement (Contract)*". After that moment the data processing is necessary for the performance of this contract and, according to Article 6 (b) of the GDPR, is lawful.

In all other cases a Client is required to express their consent prior to the collection and processing of personal data. The Company doesn't use preset checkboxes when a Client expresses their consent thus making it explicit.

9. Third Parties

We may share some of the Client's personal data with the following third parties (in amount limited to what is necessary in relation to the purposes):

- 9.1 - The company mentioned in 7.4 ("Verification"). This is necessary for the performance of the contract (see 8. Lawfulness of Processing). The information shared: 7.4.01 - 7.4.05, 7.6.01 - 7.6.03. For the certificate delivery: 7.4.08 or 7.7.01 and 7.6.01
- 9.2 - SMS-notifications service providers. Only a Client's phone number is disclosed (7.1.02) along with the message to be sent. The message itself does not contain any personal data.
- 9.3 - Voice messaging service providers. The same as with SMS-notifications (7.1.02).
- 9.4 - Mailing service provider. The personal information disclosed: 7.1.03, 7.1.05.
- 9.5 - Other Clients who are in the same referral structure. A Client can see the details of his inviter (media sponsor) and all the Clients in his own referral structure below. This data includes: 7.4.01, 7.4.02, 7.1.08 - 7.1.10, 7.1.03, 7.3.03, 7.5.01, 7.1.07

10. Where we store personal data

We store all the data in data-centers in Germany, Russia and France. These entities are the data Processors who indirectly process our Clients' personal information by our request. Note, that the nature of this processing is narrowed down to the server infrastructure maintenance and does not include any first-hand processing of the personal data. We neither disclose such information to these entities nor give them any permission to access it.

11. How long we store personal data

We store personal data as long as it's needed to provide our services, or until a Client withdraws their consent to further processing of the personal data (see 12.5).

12. Rights of the Client

Our Clients are entitled to perform a range of operations with regard to their personal data:

12.1 Obtain confirmation

Any Client has the right to obtain confirmation as to whether or not personal data concerning him or her are being processed.

12.2 Access personal data

If personal data concerning the Client is being processed by the Company, the Client has the right to access such data.

12.3 Demand additional information

Any Client has the right to demand the following additional information concerning their personal data:

- 12.3.1 - the purposes of the processing
- 12.3.2 - the categories of personal data concerned
- 12.3.3 - the recipient(s) or categorie(s) of recipient to whom the personal data have been or will be disclosed
- 12.3.4 - the criteria determining the period for which the personal data will be stored

12.4 Request rectification

Any Client has the right to obtain the rectification of inaccurate personal data concerning them (this includes to have incomplete personal data completed) from the Company without any undue delay.

12.5 "Be Forgotten"

Any Client has the right to withdraw their priviously given consent and have the personal information erased from our system. In this case third parties 9.2 - 9.4 will no longer get the personal data of a Client, and 9.5 will lose the access to such personal data. In their referral structer (if any) other Clients will see just "Account deleted".

However, 9.1 will still be in possession of Client's personal data as there is a legal groud for it (*see 8. Lawfulness of processing*).

Depending on the level of involvement there are two paths to have the personal data erased:

12.5.1 Accounts without the history of transactions

If a Client hasn't invested in the project yet the process is quite simple. It's enough to click *Settings > Security > Delete accout permanently* and that's it.

12.5.2 Accounts with the history of transactions

If a Client has already invested in the project the personal data can be deleted through technical support. It's necessary to be deleted this way to make sure no funds remain on the Client's internal balance.

All the personal data is removed from our system and the Client can even register anew with the same personal data.

12.6 Restrict processing

The Client has the right to obtain restriction of processing if the accuracy of the personal data is contested by him, for a period enabling the Company to verify the accuracy of the personal data.

12.7 Receive personal data

The Client has the right to receive personal data concerning them, which they have provided to the Company, in a structured, commonly used and machine-readable format.

12.8 Have personal data transmitted

The Client has the right to have the personal data transmitted directly from one controller to another, where technically feasible.

12.9 Object

The Client has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her.

13. Conclusion

We are committed to protecting the privacy of personal data and try to disclose the processing details in a transparent and easy way.

Should you have any questions concerning the information above, please, don't hesitate to contact us (see 4).