



HoGA Capital AG Privacy Policy

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Thank you for choosing to be part of our community at HoGA Capital AG (“**Company**”, “**we**”, “**us**”, or “**our**”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy or our practices with regards to your personal information, please contact us at ico@hoga-capital.com.

When you visit our website <https://castellocoin.com>, and use our services, you trust us with your personal information. We take your privacy very seriously. In this document, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

This privacy policy applies to all information collected through our website (such as <https://castellocoin.com>), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “**Services**”).

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

1. How should you read this Privacy Policy?

This Privacy Policy will answer the most important questions about how we collect, use and store information about you. In case you have any other questions or find any part of this Privacy Policy unclear, our Data Protection Officer is ready to help you as described in Section 12 of this Privacy Policy. Please note that any form of the word ‘we’ in this Privacy Policy stands for our company specified in Section 2 of this Privacy Policy.

2. Who is responsible for protecting our information?

HoGA Capital AG is responsible for protecting your information. If you have any questions, please reach out to the following address: ico@hoga-capital.com.

3. Why and which information do we collect about you?

Personal information you disclose to us

***In Short:** We collect personal information that you provide to us such as name, address, contact information, passwords and security data, payment information, and social media login data.*

We collect personal information that you voluntarily provide to us when registering at the Services expressing an interest in obtaining information about us or our products and services, when participating in activities on the Services (such as posting messages in our online forums or entering competitions, contests, or giveaways) or otherwise contacting us.



The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make and the products and features you use. The personal information we collect can include the following:

Name and Contact Data. We collect your first and last name, email address, postal address, phone number, country of residence and other similar contact data.

Payment Data. We collect data necessary to initiate your payment enquiry. This includes the currency with which you intend to pay (Crypto or Fiat), and the amount you intend to invest.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

***In Short:** Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

Information collected from other sources

***In Short:** We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.*

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook), as well as from other third parties. Examples of the information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL, and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links). 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 one month.

You can find the more detailed information in the subsequent Part 13 of this Privacy Policy.

4. Do we use cookies?

***In Short:** We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

5. Which information do you have to provide us with and why?

You have to provide us with the information which we need to contact you with steps outlining how to continue your purchase of the Castello Coin token. In case you do not provide us with this information, we will not be able to provide the services. You can find the more detailed information in the subsequent Part 13 of this Privacy Policy.

6. Where do we get your information from?

We get your information from:

- You;
- Blockchains of Bitcoin and other cryptocurrencies;
- Intrum AG, Switzerland (if said as identification provider);
- or other third-party providers.

You can find the more detailed information in the subsequent Part 13 of this Privacy Policy.

7. Why is it legally allowed to collect your information?

We collect information lawfully about you because:

- You have given consent to the processing of your personal data (Art. 6 para. 1 a of the GDPR)

Processing is necessary for the performance of the contract to which the data subject (you) is party or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6 para. 1 b of the GDPR). For more detailed information please refer to the subsequent Part 13 of this Privacy Policy.

8. Do we share information about you within Switzerland and the European Union?

We share the information about you with the following entities (third party providers) only where needed for the reasons listed under the Answer 3 above, if it is a third-party provider selected by you and if it is permitted by applicable laws:

Third party provider are in particular:

- Intrum AG, if used as identification provider.
- Tokengate.io, in all cases, as our STO service provider
- Capital Management Partner, if used as escrow agent
- SEBA Bank AG, if used as bank for the escrow set up

9. Do we share information about you with someone outside Switzerland and the European Economic Area (EEA)?

We share the information about you with the following entities only where needed for the reasons listed under the Answer 3 above and permitted by applicable laws.

- DSENT (Tokengate.io) AG, (CH) ([Privacy policy](#))
- Cloudflare, Inc. (USA) ([Privacy shield](#))
- Peaberry Software Inc. (US) ([Privacy policy](#))

10. How long will we keep information about you?

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than the period of time in which users have an account with us .

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

11. What can you do about your information at our company?

If you wish to do any of the following, please contact our Data Protection Officer as described in Part 12 of this Privacy Policy.

- Request us to reveal to you information we have about you;
- Request us to correct information we have about you;
- Request us to delete your information;
- Request us to restrict use or deletion of your information;
- To object to collection, use and storage of your information at our company;
- Request us to export your data to you or transfer it other companies;
- To withdraw any consent you gave to us.

To file an inquiry or a complaint, please contact us under ico@hoga-capital.com. Please note that these rights are subject to conditions and exemptions established by law as well as the procedure we will be following in order to assist you.

12. Detailed Description of How We Collect, Use and Store Data Information About You

Why do we collect information about you?	Which information do we collect about you?
Whitelist (newsletter signup)	E-Mail
Personal information to gauge and initiate the Castello Coin token purchase.	E-mail, country, name and surname, address, telephone number, currency of choice for investing, anticipated investment amount.
Customer service	E-mail address, subject of your inquiry, date of your inquiry, content of your inquiry, attachments to your inquiry, your name and (or) surname provided in your inquiry, reply to your inquiry, information provided by you
Website security	Internet protocol address (IP), user agent, referrer url, date and time of website visiting