THE STOCKBND

DATA PROTECTION AND DATA MANAGEMENT MANUAL

I. The purpose and effect of the Manual

1.1 The purpose of the present Manual is to establish the principles of data

protection and management, applied by StockBND (hereafter data manager), also

its data protection and user policy, data manager acknowledges the policy as

compulsory in its regards.

1.2 The present Manual contains the principles of personal data use given by User

on the page of the Operator.

1.3 During the formation of the present instructions the Operator particularly

considered the regulations of the Act CXIII. of 2011 (`Infotv. `) regarding the Right of

Informational Self-Determination and of Freedom of Information, included in the

2016/679 statue of the European Parliament and Council (`General Data Protection

Regulation` or `GDPR`) and the Act V. of 2013. regarding the Civil Code (`CIV`) and

the Act XLVIII. of 2008. about Basic Requirements and Certain Restrictions of

Commercial Advertising Activities.

The international footprint of StockBND involves a large number of transfers of personal information between different subsidiaries, as well as to third parties located in the countries where we do business. Some countries have implemented transfer restrictions for personal information, in connection with which IBM takes various measures, including:
- Where required, StockBND implements Standard Contractual Clauses approved by the EU Commission, or similar contractual clauses in other jurisdictions. This includes transfers to suppliers or other third parties.
- STockBND certified to the APEC Cross Border Privacy Rules.

1.4 Unless otherwise stated, the scope of the Manual does not cover those services

and data operations, which are referred to in the present Manual as pertaining to

the below mentioned advertisers on certain sites or appearing on those in other

ways and connected to third parties as well as the operator of the website or the

website manager as pertaining to promotions, prize winning games, services, other

campaigns or contents distributed by them.

Likewise, in the absence of the contrarian information, the scope of the Manual does

not cover the services or data management of such websites and service providers

that can be referenced through the manual on the website.

Such services are governed by the rules and regulations of a third party operating

the service and found in his data management Manual. The data manager accepts

no responsibility for these data managements.

II. Definitions

2.1 Data management: independent of the applied procedure or any action

affecting the personal data or the sum of the procedures, especially the collection of

personal data, the recording of those, the filing, storing, alteration, changing, usage,

pulling, viewing, using, forwarding, distributing, or the making accessible any other

way, publishing, synchronization or harmonizing or connecting, restricting, deleting

and destroying.

2.2 Data operator: the person who defines – individually or together with others –

the goal and means of Data handling. According to the services referenced in the

present Manual, StockBND LLC. (906 W 2nd AVE STE 100, Spokane, WA, 99201) is designated as Data operator.

2.3 Personal data or data: any data or information by which a natural person, User

can be clearly identified – indirectly or directly.

2.4 Data processor: the provider, who handles personal data on behalf of the Data

user. In the case of services found in the present Information Manual, Data

processors can be the following:

- ALL4FORBUSINES S.L. Calle San Aldaia – Spain CIF/VAT: ESB98376155, logistics,

home delivery of ordered products (bigbuy.eu)

- Fakturownia Sp. z o.o. Juliana Smulikowskiego 6/8 00-389 Warszawa, Poland VAT

ID PL5213704420, online invoice making (invoiceocean.com)

- StockBND LLC. 906 W 2nd Ave STE 100, Spokane, WA, 99201 United States (EIN): 83-2619007, marketing, operation

marketing activities, IT services, operator duties

- c/o The Rocket Science Group,

LLC 675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 US EIN 58-2554149,

Sending automated or occasional letters (mailchimp.com)

- Contabo GmbH,

Aschauer Straße 32a, 81549 Munich, Germany server service (contabo.com)

-Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Deutschland, server

(hetzner.com)

2.5 Service(s): Free or fee-based services can be found on the stockbnd.com

webpage, that people can use after their registration.

2.6 User: a natural person, who registers on the stockbnd.com website and

provides personal data within that framework, which are specified under point III.

2.7 Outside provider: provider partner, so called third party used by the data

operator or the operator of the given services and connected to the security of the

given services – directly or indirectly-. Personal data can and will be forwarded to

third parties to secure their services and a third party can forward personal data to

the data operator. Furthermore, data operator will consider the user as an outside

provider during storage services, when it comes to data handling activities by user

in the storage he is using.

2.8 Manual: The present Manual about data management policies of the data

operator

III. The circle of the handled personal data

3.1 If the User is the visitor of the stockbnd.com webpage, then the system of the

Data operator will automatically store the IP address of the User.

3.2 Based on the decision of the User, Data operator can operate the following

data, relating to the use of services: During registration it is compulsory to povide:

e-mail address, name. After the first purchase: phone number, exact address

(country, city, zip code, street, floor, door) and the User can give other data

voluntarily, like: hobbies and introduction.

3.3 If the User sends an invitation e-mail from the site of stockbnd.com, the system

of the Data operator will store the e-mail address of the addressee for information

purposes but only for the person who sent the invitation. The system of the Data

operator will not send letters to these e-mail addresses and will not give the address

to a third party.

3.4 If the user will connect his Facebook with the stockbnd.com webpage on his

own will, then the Data operator can operate the following personal data of the user

in addition to the above mentioned: Facebook profile name, URL of Facebook profile,

Facebook profile identification, Facebook profile picture, Facebook e-mail address.

3.5 Independent of the abovementioned it may happen that the data provider

technically connected to the data management services may conduct data

management activities without informing the data manager. Such an activity does

not constitute data management by the data manager. Data manager will do all he

can to prevent and filter such data managements.

IV. The spectrum of Subsequent data handled by the data manager

4.1 In the interest of providing individually tailored service, the data manager

places small information packets (so colled cookies) on the user's computer. The

purpose with the cookies is ensuring an ever-higher quality operation, the custommade

service and the increase of user experience. User is able to delete cookies

from his computer or can set the browser to delete and block the cookies. By

prohibiting the use of cookies user acknowledges that without the cookies the

operation of the website is not at an optimum. In this case the data manager waives

all responsibilities for lost data.

4.2 By using cookies during the personalized service on data management, data

manager handles the following personal data, information regarding the circle of

interests, habits, preferences (based of prior web searches)

4.3 The technical data recorded during the system usage are: those computer data

of the entering user which are generated during the usage of the service and which

are recorded as a result of the automated technical processes by the data

manager's system. The system automatically logs the entering or exiting data

without the express declaration or action of the user.

V. The purpose of data management and its claim

5.1 The purpose of the data management by the data manager:

a) the identification of the user, the keeping of contact with the user

b) he permission of denial of eligible services found on the stockbnd.com website

c) the handling of the personal user enquiries

d) preparation of statistics and analysis

e) the canvassing for the purpose of direct market capture and market oriented

enquiries

g) the provision of data storage space generated by the user such as introduction,

uploaded videos and photos

h) in the event of social services(chat, messaging) the securing of identification by

the users, and enabling the communication amongst one another

i) the organization and handling of occasional price lotteries, the notification of

prize winners and the provision of the prizes

j) in the case of webshop services, the creation of the contract between the parties,

the fixing of the content, modification, monitoring of the accomplishments, , the

delivery of the products ordered , the usage of the service ordered, the invoicing of

the purchase price as well as the enforcing of the follow ups involved documenting

the appropriate fulfillment of the accounting obligations

k) the technical development of the information system

 l) the protection of the user rights

m) the protection of the rights of the data manager

Data manager may not use the personal data provided for any purpose other than

expressly stated herein.

5.2 Data management is implemented upon the declaration of the users that were

executed following the voluntary and adequate briefing which declaration contains

the epress approval of the users that during the usage of the website the personal

information they provided and the personal information generated on them may be

put to use. When the data management is based upon the permission of the user,

the user is entitled to withdraw his consent at any time Which withdrawal however

does not extend to the legality of the data management that occurred prior the the

withdrawl of the consent. At the time of entry by the user on the stockbnd website

the service provider logs the user's IP address without the express permission of the

user considering the interest of the data manager as well as being able to provide

legally compliant services (e.g. unlawful usage or the filtering of unlawful content)

5.3 Data transfer to the data processors listed in this manual are permissible

without the approval of the user. Personal data can only be transferred to third

parties or to authorities only by final legal verdicts or by the prior, express, written

consent of the user unles otherwise regulated by some legal provision.

5.4 User undertakes that he legally obtains the permission of the party involved for the

publishing or sharing of data belonging to natural persons while using the website

services (e.g. during the publishing of data generated by the user) . User bears all

responsibility for the uploading of data to the services, as well as for all shared

content.

5.5 Any User providing the Email address and all other information during

registration (such as username, identity number, password etc) is to make sure that

only he personally is using the services from the given E-mail address. Accordingly,

all the responsibilities concerning the activities connected to the given Email

address and registration rests solely upon the user.

VI. Principles and method of data management

6.1 Data manager handles all personal data based on principles of good intentions,

transparency and good will as well as in accordance with the legal regulations and

the stipulations of this manual.

6.2 Data manager uses all personal data which are absolutely necessary to make

use of the services with the express consent of the user and only towards the end

goal in providing the service.

6.3 Data manager handles personal data only for the purposes set forth in this

manual while in accordance with the pertinent legal regulations. The scope of the

personal data handled are commensurate with the purpose of the data

management and can not over reach beyond those purposes. Data manager is

supposed to inform the user inall such instances when the data is to be used for

purposes other than the original intent and in such an event secures the prior

expressed approval of the user while providing user a chance of refusal.

6.4 Data manager does not check the validity of the personal data provided. The

responsibility for the data provided sets solely upon the user providing the data.

6.5 Data manager does not pass the personal information provided to any third

party except to data processors as described or referenced in this manual. Under

certain circumstances such as during official court proceedings, law enforcement

enquiries, legal procedures, copyright or material infringement or the reasonalble

suspicion of such, the violations of the rights of the data manager, the

endangerement of the services provided, the personal data of the violators may be

made available.

6.6 The system of the data manager may collect data on the activities of the users

that are not connecrted with the data provided during the registration process or

with the data generated during the service usage of other websites.

6.7 Data manager notifies the user and all those that were forwarded the data for

processing about the correction, limitation or deletion of the personal data handled.

The notification can be bypassed if the lawful rights of the user regarding the

purpose of the data provided, are not violated.

6.8 Data manager ensures the security of the personal data and undertakes to take

all necessary measures such as implementing those technical and procedural

guidelines that can guarantee that the recorded and stored data will be protected as

well as preventing the accidental loss, unlawful destruction, unlawful acces,

unlawful usage and unlawful alteration or transfer of the same. Data manager calls

upon the execution of the above all such third parties who he will distribute the

personal data to.

6.9 Based of the pertinent stipulatons of the GDPR, Data manager is not obligated

to appoint a data protection officer.

VII. The duration of the data management

7.1 Data manager stores the automatically recorded IP addresses for no longer

than 13 months from the date of the recording.

7.2 In the case of the invitations sent by the users the Email addresses will be

stored until such time that the user or the person invited will request the deletion of

same.

7.3 The personal data provided by the user will be help up until the user will

request the deletion of the data. In this case the personal data will be deleted from

the system of the data manager. Following the deletion, the user will be unable to

make use of the services of StockBND website and his user account gets terminated

as well.

7.4 In case of unlawful or deceitful use or when the user commits a crime or there

is a hacking attempt against the system, data manager is entitled to delete all

personal data of the user while terminating the registration of the use as well. At the

same time if there is a suspicion of a crime or civil liability data manager is allowed

to keep all the personal data for the duration of the legal proceedings.

7.5 During the operation of the system all recorded data will be kept from the date

of generating them until su ch time that the data manager deems it necessary to

keep the system operational. Data manager ensures that these automatically

recorded data and other personal data – except for instances where legal

stipulations rule otherwise – will not be idenfitiable, save and except for

investigating authorities and experts.

7.6 If the authorities order the deletion of the personal data, then the data manager

shall execute such an order. Instead of deletion, the data manager – while informing

the user – limits the usage of the personal data if the user so requests or if it

assumed based on the available information that the deletion would infringe upon

the rights of the user. Data manager will not delete personal data during the period

when the purpose of the data management is valid such that excluded the deletion

of the data.

VIII.

8.1 Rights of the user and the method of enforcement

User may request the data manager for briefing whether he handles the personal

data of the user and if so, then to provide access to these personal data for him.

The personal data provided by the user together with the profile data found in the

user's file can be viewed and modified. Independent of this the user can request in

writing information about the handling of the personal data sent by registered mail

or by E-mail sent to info@stockbnd.com

Data manager deems the request sent in the mail authentic if the user can be

obviously identified based on the application. If a request is sent by e-mail then the

data manager deems it authentic only if the request was sent from the user's

registered E-mail address although all this does not exclude the possibility of the

data manger identifying the user in some other ways as well.

The information request can expand to the user's data handled by the data

manager, its sources, the purpose of the data management, the legal foundations,

duration, the names and addresses of the data processers, the activities related to

the data management and in the case of transferring data who and to what end the

user's personal data was provided.

8.2 User can modify its data on the web page at any time by entering his own file.

However, following the modifications, the original data can not be restored.

8.3 User may request the deletion of his personal data handled by the data

manager. The request can be denied for the purpose of (1) excercising the right for

the freedom of opinion or the freedom ofd information (2) if legal provisions allow

the handling of data, or (3) putting forward legal claims, validation or protection.

Data manager informs the user about the denial of the request every time,

indicating the reason for the denial. Following the deletion of a requested data, the

earlier data can no longer be reinstated. User may unsubscribe from the list of

newsletters by clicking the corresponding link in the mail. In case of unsubscribing,

data manager deletes the personal data of the user in his data base. User may

unsubscribe form the system level newletters in his own user file.

8.4 User may request the data manager to limit the handling of his personal data if

the user disputes the details of the handled personal data. In this case the limitation

covers the time period that allows the data manager to check the details of the

personal data. Data manager identifies the personal data handled by him, and if the

user disputes the validity or accuracy of the data, but the disputed personal data's

inaccuracy can not be clearly established.

User may request that the data manager limits the use of his personal data even if

the data management is unlawful but if the user objects to the deletion of his data

and instead asks for the limitation of its uses.

Furthermore the user can ask that the data manager limits the usage of his dagta if

the purpose of the data usage is fulfilled, but the user requires the the handling of

the data manager in order to put forward some legal claim, validation or protection.

Simultaniously with the suspension of the data management, the user's account

gets suspended as well.

8.5 User may request that the data submitted and handled automatically by the

data manager be handed over to him in a widely used, machine legible format

and /or transferred to another data manager.

8.6 User may object against the handling of his personal data if (1) the handling of

the personal data solely pertains to the fulfillment of data manager's legal

obligation or is necessary for the fulfillment of the legal right of the data manager,

some service operator of a third party. (2) if the purpose of the data management is

the direct accomplishment of a business contract, public or scientific survey, or (3) if

the data management is done for the interest of public good. Data manager

examines the merti of the user objection and if the merti of the objection gets

established, then the data management will be cancelled, the personal data will be

blocked and will notify all parites concerned and those who have been forwarded

data earlier about the objection and the resulting connecting activities

IX. Data processing

9.1 The data manager utilizes as per the present manual the above-mentioned data

processors for the fulfillment of his activities.

9.2 Data processors do not come to an independent decision, they can only follow

the procedures outlined in the contract with the data manager and the instructions

received.

9.3 Data manager controls the work of the data processors.

9.4 Data processors are further entitled

X. External providers

10.1 The operators of the services or the data provider utilize outside providers,

and the data manager cooperates with those outside providers. The personal data

kept and handled in the operating systems of the outside providers the governing

rules are those included in the manual of the outside providers. Data manager will

do everything in his power to ensure the legally compliant handling of the personal

data transferred to the outside providers and that those data will be handled in a

legal manner and be used only as instructed by the user or as prescribed in the

present manual and for the below mentioned purposes. Data manager informs the

users about the transfer of the data to the outside providers within the confines of

this present manual.

10.2 Outside providers making the registration or entry easy

the operators of the services and/or the data manager in connection with the

providing of the services cooperate with such outside providers, who provide

applications which make user registration and entry easy. within the framework of

such cooperation certain personal data (e.g. address, e-mail, registration name) get

handed over to the outside providers and/or data processors. thes outside providers

gather, collect, handle and transfer the data according to their own internal data

protection initiatives. The outside providers enabling the registration and entry:

Facebook Inc.

10.3 Outside providers of web analytics and advertising services

The providers of the services cooperate with the service operators and or the data

manager web analytical and advertising service providers in connection with the

web page services.

10.4 These outside providers have access to the user IP address ,

furthermore in many instances assist the creation of personalized analysis or

statistics in many instances using different click measuring techniques such as web

beacon (the IP address that is used for the fixing of the web page in some instances

done in emails or mobil applications, a click tag that is a measuring code monitoring

the frequenting of a certain advertisement) or other click measuring techiques

ensuring the personalization, analysis and statistics of the services. Such cookies

placed by outside providedrs can be deleted at any time from the device of the

user, and with the proper selection of the web browser the use of the cookies can be

denied. The identification of the placed by outside providers can be done by

identifying the domain connected to the cookies. There is no possibility to refuse the

web beacon, a click tag and other click measuring techniques. These outside

providers handle the personal data transferred to them adhering to their own

internal data protection guidelines. The outside provider cooperationg with the web

analytical and advertsising sevice provider is: Facebook Inc.

10.5 Income paying outside providers enter into agreements with outside providers

who enable payments in connection with the webshop services. These income

paying providers handle the personal information transferred to them such as credit

card numbers, number of bank accouonts etc. in accordance with their own internal

data protection guidelines. Further details about these guidelines can be read on

the web page of the outside payment provider. The data manager does not store

such information. The outside providers cooperating with the data manager are:

Paypal, Stripe

10.6 In the event of providing web storage space from the point of view of the

service providing, the data manager considers outside providers those users that

are using the web storage space provided by the data manager. User is entitled to

upload personal data based on his independent decision. In all cases where the data

manager as provider provides web storage space, he does not do data management

as related to personal data. All responsibility for the legally compliant handling of

data here solely rests upon the user.

10.7 providers that neither the service operators, nor the data manager does not

have contractual relartionship

Data manager does not have contractual relationship in terms of handling data or

intentionally does not cooperate, but regardless have access to the wervice web

page either through the cooperation of the user (e.g. connecting his personal

account to the sevice) or without it and collect information about the activities of

the service page which may independently or in conjunction with other informations

gathered by other outside providers may be able to identify the user. Such outside

providers may be especially but not exclusively: Facebook Ireland LTD., Google LLC,

Instagram LLC., PayPal Holdings Inc., Pinterest Europe Ltd., Twitter International

Company, Viber Media LLC, Vimeo INC., Yahoo! EMEA Ltd., YouTube LLC E These

outside providers use the data transferred to them in accordance with their own

internal data security guidelines.

XI. Data transfers to third parties

11.1 Data manager is entitled and obligated to transfer to the authorities all such

personal data which transfer of personal data he is obligated to by the force of legal

stipulation of binding court ruling. Data manager can not be held liable for the

consequences of transferring such information.

11.2 In order to properly inform user of such data transfer, and to monitor the

lawfulness of the information transfer, Data manager logs all such transfers of

information.

XII. Electronic Signature

12.1 Electronic Transactions and Signatures are provided by UETA (Uniform Electronic Transactions Act).

12.2 The purpose of UETA is to:

By enforcing electronic signatures, it eliminates barriers to electronic business and keeps records while keeping data management and other substantive requirements.

12.3 Scope of UETA:

By defining the "transaction", UETA is limited to "business, trade and government matters".

Only applicable to parties who engage in electronic transactions.

12.4 Buyer is responsible for ensuring that the information provided in the application is true, timely and accurate. You must notify StockBND LLC (e-mail: info@stockbnd.com) in writing within 15 days. The Customer assumes the responsibility for damages resulting from the change in the data.

XIII. The amendment of the data management manual

13.1 Data manager retains the right to unilaterally amend this present manual.

13.2 By taking the next step, Users automatically accept the applicalble stipulations

of this manual, moreover there is no further need to get the approval of the

individual user

XIV. Legal remedies

14.1 Any enquiries, questions and observations about the data management, may

be put to the assistants of StockBND at the email address: info@stockbnd.com

14.2 User may turn to court with his complaints. The prevailing authority shall be the High

Court. the legal proceedings can be initiated at the district court of the user's

residence as well. At the request of the user, he is being informed about the legal

remedies and means.

11th Dec 2018