

# Prospectus for Realbit.Capital ICO Fund I

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For Investor Review Only  
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**Realbit  
Capital**

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Realbit Group  
Realbit Capital ICO Fund I Tokens  
BTC 0.001 per Token

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PROSPECTUS  
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The information in this Prospectus is not complete and may be changed. This Prospectus is not an offer to sell these securities and is not soliciting an offer to buy these securities in any jurisdiction where the offer or sale is not permitted.

Subject to Completion - Preliminary Prospectus dated July 20, 2018

NOT INSURED. MAY LOSE VALUE. NO BANK OR GOVERNMENT GUARANTEE.

The U.S. Securities and Exchange Commission (“SEC”) or any another country’s securities regulator have not approved or disapproved these securities or passed upon the accuracy or adequacy of this prospectus.

## INVESTMENT OBJECTIVE

Realbit ICO Fund I seek to provide investors with crypto-asset exposure to achieve total return.

## FUND FEES AND EXPENSES

**Investor Fees** (fees paid directly from your initial investment)

< \$5,000	0.90%
\$5,000 ≤ \$15,000	0.70%
\$15,000 <	0.60%

**Annual Fund Operating Expenses** (expenses that you pay each year as a percentage of the value of your investment)

Management Fees	0.00%
Other Expenses	0.00%
Total Annual Fund Operating Expenses	0.00%
Performance Fees	20.00%

## Other Fees

Redemption Fee (Paid to Fund Management upon Fund exit)	0.50%
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## Portfolio Turnover

The Funds may incur transaction costs when it purchases or sells crypto-assets. A higher level of trading will incur higher transactions costs and these are not captured in the funds operating expenses. In the event that the Fund becomes subject to taxation, a higher turnover may also result in a higher tax liability.

## USE OF PROCEEDS

The Company intends to raise a minimum of \$1,000,000 for its ICO Fund I. The maximum fund investment total is \$16,000,000. After the fee schedule detailed above, which will be used for marketing, operational and management expenses, the remaining funds will be 100% allocated to eligible investments. A portion of the expenses will be used to fund a private investors' portal at the Realbit.Capital website.

## PRINCIPAL INVESTMENT STRATEGIES

The initial Fund created by Realbit aims to provide investors with exposure to different types of crypto-assets in an actively managed fund structure. Crypto-assets are any types of digital tokens or currencies utilizing blockchain and cryptographic technology to create new economic systems. These assets are not issued or guaranteed by any government or bank and may be transferred via the Internet without the use of a central clearing agency. These assets may constitute utility tokens (to be used on a platform), security tokens (representing security interests in assets), or currency/payment tokens (used as a payment method).

The first and most famous such asset is Bitcoin, created by the anonymous person (or group) Satoshi Nakamoto. Bitcoin pioneered the innovations necessary to create a distributed, trustless, payment network for digital currencies. This has set off an explosion in interest in the creation, analysis, marketing and investment into crypto-assets.

We can equate the current crypto market with traditional equity size nomenclature. Large Cap essentially means Bitcoin and Ethereum (BTC and ETH are their native token codes, respectively). Most other projects lack the operational maturity or size to be considered Large Cap. Medium Cap would any token that is not Large Cap and above \$100m in market capitalization. In August 2018, this is essentially the top 60 but may fluctuate wildly based on prevailing market conditions. Anything else, include ICOs, can be considered Small or Micro Cap.

While this prospectus is not a sufficient venue for a detailed technical discussion of bitcoin (the asset) or Bitcoin (the network), it is crucial to understand some of the highlights in to be able to consider any other assets in the space as they are built on top of those concepts or variations thereof. A blockchain is a peer-to-peer, distributed ledger or put another way, a decentralized database. A block is a set of information containing block information (a cryptographic hash of the previous block, essentially a pointer, various mining and block values and a record of all the transactions contained in that block). By using mathematical techniques known as cryptographic hashes that make the previous blocks unchangeable (immutable), each block is linked to the previous block, hence the name blockchain. If an attacker attempts to change any previous block information, that cryptographic hash also changes which breaks the blockchain, making any tampering obvious. By distributing the entire blockchain across many nodes,

the system creates distributed consensus on the state of the chain. Any entity attempting a double spend (a key unsolved issue prior to Satoshi), will be noticed at the transactions rejected by the network.

Miners are incentivized to verify transactions by being rewarded a set number of bitcoins if they are able to solve a cryptographic puzzle first, called Proof of Work. This puzzle is very difficult to solve but easy to verify. Miners, by competing for these rewards, expend enormous amounts of computing power and energy which results in a network that is extremely difficult to attack. An organization attempting an attack on the blockchain would require billions of dollars in rapidly depreciating equipment and billions more in energy to even make an attempt. To date, the bitcoin blockchain has not suffered any attack on its integrity and every transaction ever made using the network remains on the blockchain, unaltered.

Platforms like Bitcoin are being built today to solve for some of the disadvantages of the Bitcoin network. Alternatives to the PoW, due to its immense energy requirements, are highly sought after and still in early stages. These include Ethereum's PoS experimental algorithm, EOS DPoS, and many other variations. Reaching consensus across a set of nodes efficiently is also an area of intense focus.

Distributed Applications (dApps) are bringing most of the Web 2.0 onto the blockchain, so far with mixed results. This sector has seen the most token issuance activity and is where much crypto-asset speculation lies. Nearly every traditional industry is represented in one form or another as a potential project from energy to media to finance to Crypto-Kitties. To date, while thousands of dApps have been funded, few are operational and those that are have struggled with attracting a sustainable user base.

Tool developers seek to make dApp development easier and more secure, both sorely needed characteristics for blockchains to even begin the move into the mass market.

Straddling the line between platform blockchains and the real world are cryptocurrency exchanges. They maintain their own internal accounting systems, only interact with blockchains when users deposit or withdraw money and frequently offer fiat currency to cryptocurrency exchange services, and vice versa. The marketplace for exchanges is highly competitive for both users and for tokens seeking to be listed. Exchanges can offer leverage, automated trading, custodial services, ease of use, and their own tokens to compete for market share. However, they represent large centralized stores of value to hackers and there has been no shortage of successful attempts at theft.

Among this abundance of innovation, change, corruption, and dynamism, the Funds seek to identify, analyze, and invest in the most promising opportunities. This environment requires general business expertise and specialized domain knowledge. Experience in the blockchain industry is few and far between however its attractiveness is bringing talent into all aspects of the business. While no platform or token from today may be in existence in even ten years, the innovations of the blockchain and cryptography are here to stay.

### *Types of Investments*

The Funds seek to invest in any company that is solely focused on work in blockchains and cryptocurrencies. The typical investment method is to purchase tokens in that ecosystem under the assumption that as the project develops, goes live and attracts users, the token will increase in utility and price. However, there are alternatives including security tokens, digital commodities, Simple Agreement for Future Equity (SAFEs) and its variants, and equity shares in the underlying company. The ICO Fund will focus on pre-sales, private sales, ICO events and recently completed ICOs. This Fund is highly risky.

The Funds will consider projects in:

- Any industry with a focus on blockchain
- Platforms
- Tool development
- dApps
- Tokenization projects
- Exchange tokens
- Digital commodities
- Stablecoins
- Security tokens

**Investment Restrictions.** In order to mediate some of the inherently high risks of investing in crypto-assets, the Funds will maintain certain restrictions in order to enforce a minimum level of diversification. The funds remain highly susceptible to overall market conditions, but the performance of any single asset should not have undue influence on the overall portfolio.

Criteria	ICO Fund I
Single Asset Exposure	< 10%
Industry Exposure	< 25%
Market Capitalization	N/A
Trading Volume	N/A

The Fund will not attempt to underwrite any securities, purchase or trade any real estate, commodities, stock exchange listed shares or derivatives on any of the former underlying assets. The Fund will not handle any form of fiat currency as a store of value although stablecoins may be used to diversify assets while investment is being deployed.

Any change to the nature of the fund, its structure, its investment objectives, target assets, asset restrictions, advisor composition, domicile, fee structure or any other declaration made in this document may be changed upon 30 days' notice to the investors unless previously approved by investors.

### *Investing Methodology*

We use multiple criteria in project evaluation to reach an investment decision. Due to the early stage nature of potential investments, many of these measures are subjective rather than quantitative. Our application of the criteria used in our methodology will be used on a dynamic basis to assign weightings for each investment. Management will make every effort to meet with the leadership of potential projects in person or teleconference during the evaluation.

### **People**

For nearly any type of investment prospect, the leadership and executing team are likely the single most important aspect for the project's success. A talented, motivated and cohesive team are infrequently encountered so part of the Management's mandate is to meet and assess as many projects as possible. A great idea in weak hands faces many more obstacles right from the start. Where applicable, Management may recommend team members, developers, strategic partners or other human resources that can fill out gaps in an otherwise promising team.

**Team Qualities.** What we look for in the ideal leadership team, and also the rest of the project team, are a passion for blockchain and the project space, execution and leadership experience, team cohesion,

creativity, energy, insightfulness, character, integrity, introspection, charisma, and transparency. Many more attributes can be listed here but the list is not intended to be comprehensive.

**Strategic Advisors.** Management also evaluates any existing or potential strategic partnerships as well as the participating advisors. Strategic partners and advisors need to be more than just nameplates on the website but able to contribute to the project milestones, even if their contributing time is limited.

**Incentive Structure.** Getting the incentive structure for the whole token ecosystem right of utmost importance and that includes the project team being properly compensated and having the right incentives. Compensation incentives are a complex and divisive subject but in this space, a team that holds too few tokens has reduced incentive to put full effort into the project, while too high incentives can result in an exit scam or lack of community engagement due to small overall token holdings.

**Project Commitment.** Finally, the team should be full-time committed to the project. Raising any significant level of funding should mean the team has the time and resources to fully commit to the project. A large part-time team contingent will result in slower deliveries, fewer communications, and lower quality project development.

## **Business Model**

Each project must create a fundamental economic model that drives development, focuses the team and forms the basis for attracting an engaged community. Models should be well thought out, comprehensively detailed while also being clearly explained. The core evaluation points are identifying the problem and presenting a solution. Only after that fundamental basis has been established do the other components become valuable additions. At this point in the ICO market maturity, teams will ideally have gone beyond only creating a whitepaper before seeking to raise funds.

**Whitepaper & Plan Quality.** Our primary initial method of sourcing investments will be reviewing newly published whitepapers. All papers will be checked for plagiarized content as the first check against fraud. Illegitimate project scammers are unlikely to dedicate the time needed to write a fully fleshed out original whitepaper in order to conduct their fraud, however, this is not guaranteed, and so constitutes only the first anti-fraud check. The whitepaper should be a presentable and organized review of the problem, solution, technical details, initial roadmap, token details and largely free of errors.

**Applicability to Blockchain.** The hype of the blockchain and cryptocurrencies has created a flood of new projects, some without any clear connection to blockchains other than the term being used in the whitepaper. Utilizing blockchains is not all positives and for certain use cases have serious drawbacks. Compared to centralized databases, blockchains can be slow, expensive, lack storage and efficiency. Alternatively, some projects may not absolutely need a blockchain to execute but can provide useful characteristics for a project's goals.

**Competitive & Industry Environment.** The team should have already reviewed and taken into consideration what traditional solutions to the problem already exist and what solutions are already using the blockchain to come up with novel solutions. Teams need to seek cheaper, faster, more functional solutions than those that already exist. Comprehensive understanding of the dynamics of the industry that will be disrupted or decentralized makes the core product development smoother.

**Addressable Market.** A key step in the valuation process of a new project is determining the current market size that may potentially start or switch to the proposed project. The equation, # of potential users x Spending/user, looks simple but whose inputs can be difficult to determine. Reasonable assumptions should be used since conducting a comprehensive market survey will be expensive and time-consuming.

Certain applications will be addressing a uniquely new area and difficult to predict with any level of confidence.

**Roadmap.** A basic roadmap outlining the major project milestones the team expects to achieve over the next 1-2 years should be available.

**Crypto-Economic Feasibility.** A subset of the overall business plan, the economics of the platform should create sustainable incentives for all potential stakeholders that will be involved in the project's success. Crypto-economics are a new and rapidly developing space and the team needs to be open to upgrading their system as the market's understanding develops.

**Stakeholder Adoption Methodology.** More than just attracting eyeballs, getting adoption from the community requires several facets of the project to succeed. Initially, attracting users to evaluate the project is the first challenge which involves a [bitcointalk.org](http://bitcointalk.org) ANN post, setting up of channels on various social media, PR/publishing plan, advertising review and competent managers for all these tasks. Ultimately, the team should have a framework for driving the external face of the project.

**Network Effect Optimization.** Along with the other economic and project adoption aspects, an ideal project also contains elements that have self-sustaining qualities to further bolster momentum. While it remains to be seen if network effects will have significant influence in blockchain applications as the Web 2.0 has had in some spaces, having a system that feeds itself makes the project more attractive. Network effects, summarized, have been traditionally defined using Metcalfe's Law which states that the effect of a telecommunications network is proportional to the square of the number of connected users (or compatible communicating devices in 1980). In reality, the network effects potential is also tied to the specific economics of the project. Billions of users but not economic model still results in no market value, for example, TCP/IP. While Facebook's advertising and monetization strategy creates massive economic value when coupled with its network effects.

**Regulatory Concerns.** Certain activities will attract more regulatory attention than others, including Dark Net markets, derivative exchanges and ICO fundraising compared to CryptoKitties. The project should have selected a jurisdiction for the team that best meets the project needs through a predictable and favorable environment. Cryptocurrency and blockchain regulation are inevitable and the countries that move the fast to establish fair ground rules will attract better projects and talent.

### **Project Code Base**

A yellow paper is the technical counterpart to the project's general-purpose whitepaper. Not many projects require a supplementary technical yellowpaper but should be considered for any sufficiently technical project. At the very least, the technical section of the whitepaper should be sufficient for a solid understanding of how the underlying project will actually work. As much of the cryptocurrency community come from a technical background, many want to understand how new ideas and concepts will be executed. The technical explanations are a great way to generate grassroots interest in the project. The technical aspects should also address current progress, MVP functionality, live project development plans, developer backgrounds, open source code for review and security details.

**Prototype Functionality.** Progress beyond the whitepaper stage is a strong indicator of a motivated team that likely possess the skills to take the project to completion. As the ICO madness of 2017 fades, investors have become more discerning over the projects they look to fund. Being able to demonstrate the beginnings of a code base goes a long way in showing dedication to the project. The longer the team can delay a public token sale, the better the prospects are for a successful token sale and project release.

**Minimum Viable Product.** Speed to market and getting products into user's hands is a popular model for product improvement, despite the launch product being fairly basic. MVP is what the team considers the base set of functionalities the product needs in order to launch. From there through user feedback and usage analytics, the product is iterated to best fit the preferences of live users. Spending too much time developing a fully featured product risks spending time on functionality that may not be valued by the market.

**Post-MVP Product Path.** Getting to MVP is important but also having an idea of the features that the developers want to implement will leave room in the code development for enhanced functions. These may not be set in stone but allows the community to see where the project is intended to reach.

**Security.** Security, or rather the failure of security, has been one of the highest profile aspects of the cryptocurrency industry. Total security is an unachievable goal but best efforts need to be made to make any breach as difficult as possible. Security audits, while not perfect either, are one tool to use. The team should be familiar with and using the best security practices.

### **Media Presence**

A company contemplating a public ICO is essentially becoming what markets would consider a public company at an extremely early stage in the company's life. Pre-IPO companies need to provide some communication and reporting to their VC investors, but it is post-IPO that they must communicate openly, frequently and according to regulations. For an ICO, these process starts much earlier and communication happens in a more direct manner through a multitude of platforms including Discord, Reddit, Telegram, Medium, Twitter, Facebook and their own site. Often times there are multiple language groups that need to be included, especially for larger projects. There should be dedicated social media team members on hand with the goal of starting and building the communities around projects. There are rampant abuses in the media space to try and attract attention or to simulate the appearance of an active and large community, however, a close examination reveals any fake or purchased followers.

**Organic Community Growth.** A small, but active, community is far better than a silent telegram chat filled with fake accounts or a huge Twitter following with no retweets. Regardless of how tempting it is to pump up numbers, the risk to the project is greater as it will arouse suspicion among real people that the project is a scam. Just as fake volume on an exchange is indicative of potential problems with the leadership's decision-making ability, the same goes for buying social media numbers.

**Effective Token Promotions.** These may take the form of bounty campaigns, airdrops, airgrabs, or attracting service providers with token rewards. These are all relatively new concepts and easy to execute poorly so that the net effect on the community is negative rather than constructive. A poorly executed bounty program, for example, can result in badly translated whitepapers and websites, attracting lots of fake accounts, incentivizing bounty hunters to sell tokens as quickly as possible causing negative price action which can demoralize early supporters, and telegram groups full of low value-added conversations and overburden community managers. These campaigns should target specific outcomes while assuming participants, for the most part, do not care about the project.

**Strategic Marketing Plan.** Each marketing plan needs to be individualized to the relevant markets. Casting a wide net might be successful in reaching a broad audience, but if the target market is not the broad market, then the plan needs reassessment. Budgetary constraints and ICO marketing bans on many platforms mean the plan should be capable of trying many levers and finding where traction occurs. Dynamism and personal attention to the community seem to be common among better marketing programs.

**Strategic Partners (Corporate).** Creating an ecosystem with valued partners can benefit the project when great relationships and common goals are the emphasized over name recognition. While there are admittedly several people and firms in the crypto space that would confer long-lasting respect from the community, those KOLs are most impressed by good projects rather than short-term financial gain, as they are already people with substantial means. Great partners want to partner with other great teams.

## **Financial**

**Funding Needs and Uses.** The project team should have an idea of what their cost structure looks like and how they plan to monetize the project to produce a sustainable long-term development plan. The Fund will also be able to contribute to the project team's cash flow projections during project assessment. The team's roadmap will be a key tool in estimating team size and associated development needs.

**Valuation.** Even for experienced VC investors, getting a handle on the true future potential value of a seed investment years, or decades before it matures is fraught with uncertainty. The result is a model of many seed investments with the understanding that the return of a few winners will far outweigh 80% total losses on other seed investments. This methodology depends on a proper diversification of the seed investments, as a portfolio of 10 may end up all losers. Ensuring that we deploy our capital properly, we may find attractive projects but that are attempting to raise money at levels we deem excessive. The investment options then are to invest a smaller size or pass on the opportunity and review after the ICO is completed.

**Token Sale Structure.** The structure of token sales should be balanced across the different stakeholders so that there are no artificial distortions made that will cause problems. The development team should receive 10-20% of the tokens, locked up for 1-2 years with a cliff vesting schedule. Allocating more tokens will start to raise questions from the community and any less doesn't motivate the team. There should then be allocations for the public sale, private/pre-sale (at most equal in size to the public sale if a public community is important to the project), marketing/bounty/airdrop campaign, foundation/ecosystem, and one-off operational expenses.

**Token Fund Distribution.** The main three channels funds from the token sale should flow to are development, partner on-boarding, and marketing with smaller allocations to ongoing operational expenses and company reserve.

## **PRINCIPAL RISKS OF INVESTING IN THE FUND**

Risk is inherent in all investing. Investing in the Fund involves risk, including the risk that you may lose all or part of your investment. There can be no assurance that the Fund will meet its stated objectives.

Investors in the Fund should be willing to accept a high degree of volatility in the price of the Fund's tokens and the possibility of significant or total loss. An investment in the Fund involves a substantial degree of risk. An investment in the Fund is not a deposit with a bank and is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency, bank or insurance company. Therefore, you should consider carefully the following risks before investing in the Fund, each of which could significantly and adversely affect the value of an investment in the Fund.

### *Fund Investment Risks*

**Risk of All or Substantially All Loss of Investment.** The volatile nature of crypto-assets, their early stage of development, technological novelty, regulatory uncertainty and risk of fraud or business disruption means that investors are at risk of losing all or substantially all of their investment in the Fund.

**Capital at Risk.** Any investment in the Fund puts that capital at risk of loss. Investors may recover some or none of their investment at a later date. No investor should contribute more to the Fund than they are willing to lose and the Fund should remain only one part of their investment portfolio. Investors should consult their financial advisors, legal counsel, and accountants prior to making any investment. If an investor does not have access to these types of advisory resources, they should seriously consider the prudence of their investment in this high-risk asset class.

**Limited History Asset Class.** Crypto-asset funds have existed for only a few years and as such are untested as an asset class. This prevents new challenges and opportunities for funds and investors. Many of the risks below have not yet been realized in any significant form and so market standards and best practices remain undefined. Funds are exploring many different structuring mechanisms, pricing, investment strategies and governance. Realbit.Capital is among those exploring the various options available and may or may not choose optimal functionality.

**New Technology.** Blockchain technologies and its cryptocurrency counterparts are a maximum of 10 years old while the wider ecosystem has only started to develop in the last four years, marked by the crowdfunding of the Ethereum network in 3Q 2014. The early stages of the market are demonstrated by the multitude of competing variants for consensus, scalability, and security. These areas present significant challenges for all participants but the foundations for a global, mature blockchain system is being built today. This youthful vibrancy also means many failures, dead tokens, and opportunities for unscrupulous actors to exploit an eager, but naïve, public.

**Centralized Exchange Risk.** Storing crypto-assets on a centralized exchange has proven to be an easy way to manage crypto-assets for less technically comfortable users but comes with the risk that those exchange's security is compromised. There have been dozens of exchange hacks and they remain constantly under attack as they control significant amounts of assets ("honeypots") that are extremely attractive to hackers. Security is expected to improve however the sophistication of corresponding attacks will follow in lockstep. Additionally, if a user's account access details are compromised, through a phishing or other attack, funds can be quickly withdrawn and disappear. Insurance may or may not be available to reimburse users for stolen assets. Centralized exchanges are attractive for their trading volumes, liquidity, and low fees. Should the Fund elect to use any centralized exchanges, risk will be reduced by using multiple exchanges and using decentralized exchanges to the extent feasible. These exchanges maintain their own internal accounting systems and so all crypto-assets are technically in custody of the exchange with internal ownership record keeping.

**Decentralized Exchange Risk.** Decentralized exchanges are a much discussed but relatively new addition to the crypto-asset space and allow trading in many more types of assets, private keys are not exposed, allows direct peer-to-peer trading, and trades happen on-chain. Since these exchanges are newer, have a steeper learning curve and lower usage rates, they suffer from a lack of liquidity and higher fees. These areas should improve with higher user rates and liquidity algorithm improvements. For many smaller tokens, these exchanges may be the only places to trade tokens and attempting to liquidate or purchase a significant amount of crypto-assets may have a large price impact.

**Blockchain Platform Risk.** Bitcoin and Ethereum account for the majority of brand recognition, transactions, development, market capitalization and volume, but there are dozens of other competing blockchains in development, from whitepapers looking for funding to launched mainnets. ICOs may choose any number of functioning blockchains to perform their token generation event and each blockchain has its own inherent advantages and risks. Ethereum's blockchain has not been hacked, but its smart contracts, based on the Solidity programming language created solely for the Ethereum blockchain,

have exhibited vulnerabilities in security. The DAO security vulnerability that allowed 3.6mm ETH (\$55mm at the time) to be drained was deemed so serious that the result was Ethereum's user base electing to fork the project to return the stolen funds. The Parity multi-signature wallet attacks were also serious because of the sophistication of the team members (founded by Gavin Wood who co-founded Ethereum) and the level of public security analysis of the wallet code. Regardless, in July 2017, 150,000 ETH (\$30mm) were stolen and then 513,695.80 ETH + ERC20 tokens (\$150mm) were permanently frozen months later in November 2017. We can expect these platform-specific risks to be part of any blockchain project for the foreseeable future.

**Foreign Exchange Risk.** Any investor in the Fund will be subject to foreign exchange risk between the crypto-assets and their preferred fiat currency. Should the fund outperform its crypto benchmark, it may still lose funds if the investor's fiat currency has appreciated significantly in comparison. Bitcoin futures are now available at the Chicago Mercantile Exchange, this is not a viable option for most investors nor are there other solutions to reduce this fiat to crypto exchange risk.

**Risk of Fraud.** Recent reports estimate that 80% of ICOs projects have died. Determining which are intentional frauds and scams from those that are failed businesses is hard to determine. The fact remains that in the cryptocurrency industry fraud is a significant and frequent occurrence. Scammers expend significant energy in building convincing facades to lure funds from investors unwilling or unable to conduct extensive due diligence or get caught up in the hype behind a project. Additionally, there is typically little recourse to victims of crypto fraud due to the stateless nature of the BTC and ETH, the most common currencies used for token sales. Jurisdiction issues and the ability to recover funds are a major concern for local law enforcement. There are no methods to guarantee that a project is legitimate or will simply stop operations in the months following an ICO.

**Regulatory Risk.** Governments across the globe have responded differently to the advent of crypto-assets increasing visibility and usage. Viewpoints have ranged from heavy restrictions to no action necessary. While crypto-assets initially developed in a nearly regulation-free environment, today there are rapid changes in regulatory viewpoints, each influenced by how crypto-assets have the potential to affect their economic priorities and structure. Lack of clarity has been detrimental to the development of blockchain acceptance, especially by corporate and institutional users that require a regulatory framework for adoption. Tokens and their issuing companies may fall under different jurisdictions depending on investor base, team location, corporate registration and economic impact. Increased or onerous regulations may have adverse impacts on the ability of the token teams that the Fund invests in to continue a project. Regulations may also restrict demand for crypto-assets, negatively affecting prices.

**High Volatility.** If Crypto-assets assets have been characterized as anything by the general public, it is by their extreme volatility. Bitcoin began July 2017 at \$2,490, reached an all-time high of \$19,783 on December 17, 2017, and trading at \$6,371 on July 1, 2018. This is for the most stable, largest and well-known crypto-asset. Higher volatility has been exhibited in nearly every asset smaller and newer than bitcoin, which is to say all of them. Extreme volatility will impact any exchange-listed asset owned by the Fund. The fund intends to hold investments for the medium term but may make sales and purchases that are deemed advantageous to the fund. Highly volatile markets amplify the results of these decisions, positive or negative. Additionally, as the fund seeks to exit investments during the redemption period, the current state of the market will have a large impact on final investment results, even if outperforming the benchmark index.

**Hacking and Cybersecurity.** There are many ways for hackers to gain illicit access to other users' funds and total security is nearly impossible to achieve for even the most diligent and experienced security

expert. The more complexity and functionality introduced to a system the larger the “attack surface” becomes, reducing the effectiveness, but not the necessity, of security audits and procedures. Attackers may target smart contracts, wallets, blockchains, centralized databases, exchanges, protocols, private key storage, and anywhere else that may lead them to available assets or additional information. Despite the measures the Fund may take to ensure the security of its assets and investments, no guarantee can be made against hacking or theft.

**Legal Jurisdiction May Be Difficult to Determine.** The Fund itself may be unexpectedly subject to the legal and law enforcement reach of other jurisdictions. Therefore, the Fund may be compelled to make changes to its structure, process, investor profile, tax liability assessments, or security filings. These may have a material impact on the interests of investors as well as any disbursements from the fund.

**Lack of Investor Protections.** Due to the nature of the fund, dealing only in crypto-assets as investments and sources of funding, there are no de jure security regulations that directly cover the Fund and so investors should not rely on the securities laws of their jurisdiction in the evaluation of the Fund. However, the Fund and its Management intend to follow the spirit of disclosure-based securities law to the extent possible. While this document will not initially be filed with any national regulatory agency, Management does not expect many significant changes to be made to the document in order to make such a filing. The Fund is not a licensed or registered broker-dealer, investment advisor, bank, or institutional investor. Currently, the Fund has no domicile or legal entity in existence making the Fund an entirely virtual investment vehicle. This may make the Fund applicable to the laws of no jurisdiction or all jurisdictions.

**Loss of Private Keys.** The Fund intends to maintain some of the private keys to its blockchain wallets in cold-storage, as is standard security to any significant amount of assets that are not intended for short-term access or trading. Cold storage of private keys involves physical storage of the cryptographic character sequence required to access funds and prove ownership. Thus, the private keys are at risk of fire, water, electric, or earthquake damage or theft or loss. Realization of any of these events would involve the total loss of access to the associated wallet.

**No Insurance.** The assets of the Fund are not insured by any insurance company, bank, regulatory agency, guarantee company or other third party. The value of the fund lies solely in the value of the underlying assets. Insurance in the crypto space is a very new and untested offering with relatively low insurable amounts. Management does not expect any investment to be covered by insurance nor any holdings on an exchange.

**Lack of Operating History, Operational Risk.** Management is invested in various traditional and crypto funds, however, has no direct experience in marketing, managing and liquidating crypto-assets on behalf of investors in a Crypto Fund. This lack of operational experience exposes investors to loss if investment due to mistakes made by Management. Every firm contains operational risk and investors in the Fund are also exposed in this project.

**Management Risk.** Management may make decisions that do not result in profitable outcomes for the Fund. The decision-making ability of the team may not be as expected and result in unexpected investor losses. Decisions made to trust certain third parties (custodians, exchanges, wallets, and smart contracts) may result in unexpected outcomes harmful to the value of the Fund.

**Market Risk.** The crypto-asset universe is still relatively small (approximately \$250bn on July 1, 2018) and the assets are relatively correlated. Picking outperforming assets can still result in a loss if the overall

market suffers an acute or chronic downturn. Additionally, relatively small in or outflows can have outsized effects on small markets.

**Non-Diversification Risk.** The Fund's portfolio of assets may fail to achieve true, or optimized, diversification thus resulting in excess risk for a given level of return. Management aims to deploy capital as fast as is prudent but market opportunities or lack thereof may force to team to reach the single and industry asset limitations described above. These limits are intended to enforce a minimum amount of diversification, however, the Fund expects to have additional diversification of assets, and this may not always be achievable.

**Legal Uncertainty.** The Fund has made no securities filings with any national regulator and so the legal status of the Fund is uncertain and what jurisdiction, if any, applies to its operation. The Fund seeks to remain compliant with any regulatory or law enforcement requests within its means and ability to comply. The Fund has no interest in aiding money laundering or other illicit activity.

**NAV Deviation Risk.** The Net Asset Value of the Fund may fluctuate considerably from the true NAV especially at inception until its assets become exchange-listed and more liquid.

**Liquidity Risk.** The Fund seeks to invest in initially illiquid assets through pre-sales, private sales, and token generation events. The Fund may also invest in recently listed ICO projects that are deemed considerably underpriced, which may also be exchange traded but have sparse liquidity. Due to the illiquidity of most of the Fund's investments, investors will not be able to redeem or withdraw capital from the Fund. Only when the Redemption Period begins and crypto-assets are liquidated will funds be dispersed to investors on a pro-rata basis. Investors should not invest any capital in the Fund that may be needed during the expected 3-year life of the Fund.

**Risky Asset Correlation Risk.** Largely unknown at the current time is to what extent the recently issued tokens purchased by the Fund are correlated. In the event of a down market and high correlations, substantially all of the Fund's investments may decrease in value. Additionally, risky crypto-asset returns may turn out to be correlated with other asset classes, such as equities or derivative instruments. An investor with a high-risk portfolio may be negatively impacted if crypto-assets exhibit correlated returns with other high-risk assets in that investor's portfolio.

**Lack of Hedging Instruments.** There are no currently available derivative products that the Fund can make use of to hedge overall portfolio or specific asset risk. Therefore, the Fund will be a long-only portfolio.

**Stablecoin Risk.** No portion of the Fund's assets will be converted to fiat currency. However, the Fund may hold some portion of its uninvested assets in stablecoins between fundraising and making investments. However, no stablecoin has the history required to demonstrate a track record of stability to a fiat currency. There are multiple stablecoin projects based on three main methods. The most notable is Tether (USDT), however serious concerns have been raised over this stablecoin. While allegedly each token is backed by one US dollar, they have so far not allowed any audits nor are any tokens actually convertible to US dollars, according to their terms and conditions. Significant amounts of tokens have entered the markets during times when the sponsoring company seemed to have no banking relationships. Should the Fund choose to use stablecoins, there is the risk that they are not stable or even that they totally collapse.

**No Custodian Risk.** The Fund will not use a custodian for the warehousing of crypto-assets in the portfolio. Crypto compatible custodian services are an extremely new industry with little performance

history. The existing custodian services in the market focus on a small subset of the largest crypto-assets. The assets the Fund intends to invest in therefore are not yet eligible for custodial services. Given the early history of the asset class, expenses for these services are also very high. Management intends to use the best practices for self-custody of the portfolio's assets.

### *Individual Investments by the Fund Risks*

**Technology Untested.** For nearly every project the fund invests in, the technology will be untested and may remain so for months or years. The Fund will make early stage, seed investments with the aim to allow the team to focus on product development. Technology development entails significant risks and potentially many of the projects will fail completely.

**Competing Platforms/Applications.** High quality, greenfield projects with little or no existing competition will be difficult to source. Many of the assets purchased will have significant competition, some with extensive lead time on development.

**Development Risk.** Development by companies may stall or fail completely for a variety of reasons. Should the team fail while continuing to hold funds that were invested, there will be no legal obligation for them to provide refunds unless explicitly stated.

**Open source/IP Risk.** Many projects maintain open source project code on sites such as GitHub. This allows others to view, contribute, analyze but also use this code in other projects. A competing project may use various different projects code base and tie them together, creating a product with a rapid market strategy. Management supports the open source environment present in the crypto-asset industry but it may adversely impact investments.

**Lack of Operating History.** Each investment is early stage and therefore the company has a complete lack of operating history. The contributing team members may have extensive operational experience and those projects, *ceteris paribus*, are preferred.

**Small Companies Risk.** Small companies will be subject to different challenges than large companies. They may have trouble attracting talent, signing corporate leases, organizing key departments, as well as being particularly vulnerable to market cycles. Small companies may be thinly traded when they become listed on an exchange, this is especially true for decentralized exchanges.

## **FUND STRUCTURE**

### *Fund Lifecycle*

The Fund will follow a similar lifecycle as a traditional VC fund with a few key differences.

We have chosen to straddle the line between traditional VC and Crypto funds and the new tokenized VC model that has recently seen traction. In the traditional VC model, there are 3 phases:

1. **Marketing.** The General Partners seek to raise funding for the project by seeking out Limited Partners that provide capital.
2. **Commitment.** After funding has closed (additional funding rounds may occur), the GP starts to put the capital to work, calling in the actual investment as it is deployed. Capital investments are made throughout this period at the discretion of the GP.
3. **Redemption.** The GP terminates new investments and seeks to liquidate holdings at favorable times. All liquidations are returned to the Partners in the fund over the term of the divestment period.

The major downside to this time-tested method is that the total time period ranges from 7-15 years of investment lock-up. Any early withdrawals that occur come at a steep discount.

The new tokenized VC model essentially operates as a closed end investment fund that issues tokens rather than shares. The capital is raised, tokens are issued and then no more investment goes in or out of the fund. Tokens are not redeemable for assets or funds from the fund manager. Rather, these tokens can be traded on an exchange, typically at some price close to the fund's NAV providing liquidity but still has exposure to VC-like investments. We are intrigued by this new model and will consider it for future funds.

Realbit.Capital's structure sits in the middle of these approaches in what we consider an attractive hybrid. We will still use a Marketing, Commitment and Redemption methodology but with much shorter lock-up periods. Due to the nature of the ICO market, these assets become liquid much sooner than traditional tech equity IPOs. Due to our KYC/AML process, we will also know all of our investors and can more easily distribute investment gains through various methods in the divestment period because our investors have not changed. Our ability to build a strong community is also strengthened. Finally, we may make divestments to investors in the assets held by the fund which may have beneficial tax implications over a purely traditional fiat distribution.

### *Closed-End Investment Structure*

The Fund will sell tokens on an open basis at a rate fixed to either ETH or BTC during the Marketing period of the fund lifecycle. The fixing rate is largely arbitrary as it will be fixed to another cryptocurrency rather than fiat. The raising of funds will occur on a continuous basis until the Management decides to end the Marketing period or the hard cap ceiling is reached. Following the closing of the Fund, no new investment will be available to existing or new investors. The Fund will then seek to fully invest in the target crypto-assets during the Investment Period.

**Lock-In Period.** The tokens distributed by the Fund will not be tradeable on centralized or decentralized exchanges for up to two years following the closing of the fund to new investment. Management seeks to build a close-knit community, have only KYC verified investors, and allow the fund to ramp up investing before any unlocking of the tokens is considered. Management will periodically publish investment summary reports with the NAV based on purchase value for un-listed investments and the current market value for any listed tokens.

Management may, at its own discretion, keep the fund tokens locked for exchange trading until the redemption period begins, effectively preventing the tokens from ever trading on an exchange. Token holders will receive the assets of the fund on a pro-rata basis. When the assets of the fund are fully distributed to token holders, those tokens will cease to have any value. To repeat, investors in the Fund's tokens may never have the opportunity to trade their tokens before the end of the life of the Fund. Investors should fully consider their future liquidity needs and ensure their investment in the fund doesn't constitute a significant portion of their overall assets.

- Greater flexibility for investments, illiquid securities, and strategies due to fixed capital,
- What happens if expenses are higher than fees?

## **PURCHASE AND SALE OF FUND INTERESTS**

The Fund shall issue tokens during the Marketing Period of the Fund's lifecycle. Tokens will only be issued during this time and investors will be thereafter subject to the investment structure, terms and conditions contained in this document. Purchase of tokens issued by the Fund will be only available

through the Realbit.Capital investor platform and will exist electronically on Realbit.Capital's IT infrastructure as well as the Ethereum blockchain as an ERC20 compatible token. No physical shares, tokens, or certificates will be issued to any investors. Confirmations of each token investment will be provided to investors via private communication. Tokens received by investors are subject to the lock-in period established by Management, which may last the entirety of the life of the fund. There is not guarantee the tokens will be listed on any exchange.

Pricing of tokens will be in Bitcoin (BTC) or Ether (ETH) and may only be purchased with BTC or ETH through the investors' platform. Confirmation of transfer success usually takes 2-20 subsequent block confirmations.

After the Investment Period, Management will begin closing investment positions and redistributing assets pro rata to investors. Return of assets will occur in a manner as to not unduly affect the trading market environment for each asset. As such, the redemption period may take up to one year. A reimbursement schedule will be created and distributed to investors that covers the Redemption Period, however, this document will be a plan and not a binding schedule. During the Redemption Period, the preservation of capital is the Fund's main objective.

The Fund may liquidate and terminate at any time without shareholder approval. Assets remaining in the Fund at termination would be distributed pro rata to investors.

## **PERFORMANCE OF THE FUND**

The Fund has no operating history at the time of this filing and no performance history to report.

**Performance Reporting Schedule.** The Fund calculates performance at 12:00 UTC time on the last business day of each month, exclusive of the first 3 months when Management will be deploying investments. The first full fund performance report will become available after the first performance period concludes 3 months after fund close, on the last business day of that month. Following reports will be made on a monthly basis after NAV has been calculated on the last business day of every month.

## **MANAGEMENT OF THE FUND**

The Advisor has overall responsibility for the investment deployment and oversight process activities of the Fund.

The only source of income to Management are the purchase fee, performance fee, and exit fee, there are no other cash, stock, salary or other compensation programs in place. No other benefits are conferred upon Management. The performance fee is intended to cover the costs of purchasing crypto-assets, administering the fund and compensating Management for continuously monitoring the investments. Out of the performance fee, the Management pays substantially all of the expenses of the fund, including custody, administration, legal, audit and other service and licensing fees.

In the absence of willful malfeasance, bad faith, gross negligence or reckless disregard of its obligations to the Fund, the management are not liable to investors for any act or omission in the supervision or management of its respective investment activities or for any loss sustained by the Fund's investors and provides for indemnification by the Fund for Realbit.Capital, its directors, officers, employees, agents and control persons for liabilities incurred by them in connection with their services to the Fund.

## *Portfolio Managers*

The Management will use a team-based approach to the evaluation, investment and exit strategies of the Fund. No individuals will make unilateral decisions on investments or exits as Management believes that cooperation and discussion will yield a more optimal decision-making process, perhaps at the sacrifice of some speed. The Fund Management will be responsible for the other internal team members and also consult with external experts on various aspects of investments, as deemed necessary. The main portfolio managers responsible for the key decision making are James Bian, Anders Paulsson, and Jason Zhao.

**James Bian.** James has over 15 years' experience in marketing, management consulting, investment and internet sectors. He has a strategic mindset along with hands-on operational capabilities that are the result of him leading several successful startups. He holds a BS in electrical engineering and an MBA degree.

**Anders Paulsson.** Having spent most of his career in finance related functions across a dozen industries, he brings a broad viewpoint to Realbit's future development. He has significant experience in leading cross-cultural teams to successful outcomes. Over the last decade, has focused mainly on startup teams but has consulted for Private Equity firms and Fortune 500 companies. He has intense belief in the future of blockchain applications and its ability to fundamentally improve the internet as we know it.

**Jason Zhao.** Jason has 15 years of private equity experience (FOF and direct investment) in greater China with outstanding track records. Portfolios exited in NASDAQ, Shanghai Stock Exchange (China's big board), ChiNext (China's NASDAQ), Taiwan Stock Exchange and multiple trade sales. Managed and advised funds exceeding AUM USD 4,500,000,000. Directly deployed USD 450,000,000 FOF and USD 750,000,000 direct investments. More than ten years of industry experiences with US, UK, Germany, and China based multinational companies. Hands on experience in General Management with P&L responsibilities, Strategy, Marketing, R&D, and Supply Chain Management.

**Securities Ownership of Portfolio Managers.** At the establishment of this Fund, as it holds no assets, none of the Management owns any of the crypto-assets owned by the Fund. As the Fund is focused on pre-ICO, ICO and recent ICO investments, it is highly unlikely that Management will ever have a pre-existing investment in a potential Fund investment. Management may invest alongside the Fund for personal investments but may only do so upon equal terms to the Fund and may not front run or otherwise profit at the expense of the Fund. Any investments help by both the Fund and Management will be disclosed to investors. The current Management don't currently manage any other crypto-asset funds.

## **DISTRIBUTIONS, TAXES**

### *Taxes on the Fund*

The Fund intends to establish its legal entity in a tax-free jurisdiction so that the operations of the Fund incur no capital gains or incomes taxes. As long as the Fund qualifies, it will not be subject to taxes on distributions of its net investment income and net realized capital gains. Investors may fall under different tax regimes and so may be assess on distributions. The Fund is not liable for the taxes of any investors or to make declarations to tax authorities on behalf of investors unless required by law in its jurisdiction. Any disclosure requirements of the Fund's activities or investors by the jurisdiction will be made to the relevant authorities as necessary.

### *Taxes on Distributions to Investors*

The Fund will make distributions of crypto-assets generated from net capital gains and net investment income to its investors during the Redemption phase of the Fund. Investors are solely responsible for any tax liability created by these distributions. There is no distribution schedule and may occur at any time during the Redemption period. Crypto assets will be sent to the registered wallet address of investors and as such, investors should confirm they still have access rights to those registered wallet addresses. The Fund and Management are not responsible for any incorrect addresses or lost private keys. Management is not able to recover, refund or otherwise alter any transactions it makes to registered wallet addresses. All distributions are final and irreversible and the fund retains no liability for investor errors. The Fund is not liable in any way for the tax liabilities of investors that may arise out of distributions to investors.

### **DETERMINATION OF NET ASSET VALUE**

The Net Asset Value of the Fund will be determined at the last business day of every month at 12:00 (noon) UTC time. Net asset value is calculated by aggregating the market price of all assets of the fund (or book value of any assets without a market price), including any forks, airdrops or other beneficiary assets, less any liabilities and then dividing such amount by the total number of outstanding tokens. The amount, rounded to the nearest US dollar cent is the net asset value per share. The market price will that which is published on CoinMarketCap.com and if no listing is available there, the average of the three largest exchanges by volume will be used to price an asset, if available.

During the Funds investment period, illiquid assets may at any time make up substantially all of the portfolio's invested assets. Per generally accepted accounting principles, these assets will be carried at their book value. The book value will be the lesser of the purchase price or impaired value. An impaired value will be based on the judgment of the Fund's Management as to if any asset has experienced a significant reduction in its value based on market conditions, project circumstances, exit scam, team abandonment, or other situation that severely affects the value of the asset. Management will not increase the value of any asset through this process. The value of the fund may make experience significant changes in value due to this process as assets that become listed may unexpected rise or fall in price. Even when market pricing exists for an asset, the pricing may be stale or unreliable. If the Fund were to liquid holdings in an asset whose market price is unreliable or experiences relatively low volumes compared to the Fund's holdings, large price changes may result.

### **INVESTMENT DISCLOSURES**

#### **NOTES TO ADD OR CHANGE:**

1. Tokenization, details, specifics, restrictions
2. Regulatory plans, reasons, etc
3. Extensive time for price discovery of underlying assets.

This document is intended for informational purposes only. The views expressed in this document are not, and should not be construed as, investment advice or recommendations. Recipients of this document should do their own due diligence, taking into account their specific financial circumstances, investment objectives and risk tolerance (which are not considered in this document) before investing.

## **LEGAL DISCLAIMER**

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Realbit strives to provide full and fair disclosure of all material information for a token buyer to make an informed purchasing decision, including information about the Realbit’s financial condition, management, and other relevant details. Should potential purchasers request additional information about the project, Realbit will make best efforts to publically and in a timely matter publish information relevant to the community.

### *Forward Looking Statements*

Any assumptions, views or opinions (including statements, projections, forecasts or other forward-looking statements) contained in this presentation represent the assumptions, views or opinions of the Company as of the date indicated and are subject to change without notice. All information not separately sourced is from Company data and estimates. The information contained in this presentation related to past performance is not an indication of future performance. The information in this presentation is not intended to predict actual results, and no assurances are given with respect thereto.

All such forward-looking statements are intended to enjoy the protection of the safe harbor for forward-looking statements contained in the Private Securities Litigation Reform Act of 1995, as amended. Although we believe there is a reasonable basis for the forward-looking statements, our actual results could be materially different. The most important factors which could cause our actual results to differ from our forward-looking statements are set forth on our description of risk factors in our future token prospectus, which should be read in conjunction with the forward-looking statements in this report.

Forward-looking statements speak only as of the date they are made, and we do not undertake any obligation to update any forward-looking statement.

### *Token Disclaimer*

Realbit's opinion on the nature of the tokens discussed may differ from relevant regulatory agencies. Realbit shall not be liable for any difference in opinion with any regulatory agency.

Realbit does NOT provide investment advisory services in any manner or form. Token products (i) are not bank deposits or obligations of or guaranteed by Realbit or any of its affiliates or subsidiaries; (ii) are not insured by any governmental agency and (iii) are subject to various risks, including the possible loss of the principal amount contributed. Past performance is not indicative of future results, prices/purchased sum is subject to market risks which may result in appreciation or depreciation.

At some time after the sale of Realbit tokens, they may become available to trade on various exchanges. Due to public sentiment and related demand and supply, the price of the token may fluctuate significantly.

Token products are not available to US persons or residents, citizens of the People's Republic of China, North Korea, Syria, Sudan, Iran or any other Embargoed Countries, Entities or Persons and may not be available in all jurisdictions. By making any purchase, you confirm your deemed acceptance of the conditions mentioned herein.

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### *Privacy Notice*

In accordance with GDPR and other national privacy regulations regarding personal information, we provide a transparent, concise, intelligible, informative and easily accessible view as to the way we collect and handle personal information. Users who have submitted personal information to the Company may at any time request access to the data we have on record.

What information is being collected?

The information we collect on our users is mainly focused on performing KYC ("Know Your Customer"),

AML (“Anti-Money Laundering”) and CIP (“Customer Identification Program”) checks against various global restricted lists. You may be restricted based on your identity, country of citizenship, country of residence or affiliation with restricted legal entities. In addition, we collect information that we will use in marketing and communication efforts in order to stay in contact with our users to better serve your needs. Most marketing and communication data will be optional. Information we seek includes, but is not limited to:

- Full legal name
- Registered address & residency status
- Country of citizenship (any and all citizenships)
- Currently under restriction, suspicion or indictment for terrorist activities or funding, money laundering, or other criminal activities?
- Corroborating evidence – Passport photo, a photo of the applicant, proof of residency, proof of address
- For transactions of significant size, proof of legitimate source of funds
- Relevant contact information – Phone, email, address
- Optional information may include: Occupation, gender, annual income, investing experience, organization, employment status, marketing preferences

Who is collecting it? What is the source of your personal information?

The personal information that we collect is provided directly by our users and maintained by Realbit directly at our data centers. We collect your information directly through our website and do not seek additional information from any 3rd parties outside of required KYC, AML and CIP procedures.

Why is it being collected? Do you have to provide your personal information to us?

In order for any user to participate in any Realbit platform, users must provide enough information for us to comply with global KYC, AML, and CIP procedures. If we do not have enough information to conduct these procedures, we cannot allow the applicant to progress further in using the platform.

What do we use your personal data for?

The information we collect will be used to conduct checks against global and national restricted lists. Additionally, we intend to communicate frequently with our users and we will use personal contact information provided to do so.

When do we share your personal information with other organizations?

Should Realbit choose to outsource our KYC, AML and CIP compliance verification to a third party, we will only be provided such information that is necessary for those compliance checks. We will not provide user information to any other third party without user permission unless compelled to do so by government regulating agencies, courts or law enforcement agencies in accordance with relevant laws and regulations.

What will be the effect of this on the individuals concerned?

As Realbit will be holding our users' personal information, this is a risk that unauthorized users gain access to our user records that are using our platform. Our data protection policies are formulated to minimize to the greatest extent that our protections are breached, however, Realbit cannot guarantee to any certainty that these protections will not be breached. Providing your personal information to any third party means outside of the users' control results in this risk. The company's data protection standards are in place to control how and when information is stored and accessed to best achieve high levels of personal information protection.

How and when can you withdraw your consent?

If a user would like to have their information that has been collected by the Company to be deleted, they must contact the company at our official contact email address and specify their requirements. Within seven (7) business days, we will remove that user's personal information from our system. However, this will also result in a failure of compliance with international financial compliance regulations and since we will no longer be able to associate an account with a real identity. We will then be required to terminate any and all relationships with that user and they will be denied access to any Company resources, functions or usage under Company control. This relationship termination also results in a termination of any relevant legal rights, warranties, expressed or implied liabilities that remain between Realbit and the user.

Is the intended use likely to cause individuals to object or complain?

As the Company only requires information from our users to complete KYC, AML and CIP compliance procedures, we don't expect users to object to or complain about this data collection. Other information is provided on an optional basis by the user and they may choose to have this data removed upon written request to the Company. Should our privacy policy change, we will provide new versions to all current users via their provided email address.

Is your personal information transferred outside the UK or the EEA?

Realbit is not regulated directly by any agency or regulator based in the UK or EEA. Any information provided by the user is stored outside of the UK/EEA by default. While we are not strictly required to comply with new EU GDPR policies, we choose to follow the spirit of these regulations for the benefit of our users and community.

How do we share your information with Fraud Prevention Agencies or credit reference agencies?

Transmitting any user information to 3rd parties will use secure encrypted communication channels during the KYC, AML, and CIP procedures. Should Realbit be required to provide information to government regulators, law enforcement agencies or courts, transmission of that data may occur through postal services, digital transfer or other methods as required by those government entities.

What should you do if your personal information changes?

Should a user's personal information change at any time, they are required to update their details with the Company as soon as reasonable. Should any change happen, Realbit requires that the Company is provided notice within thirty (30) days.

For how long is your personal information retained by us?

We will maintain your KYC, AML, and CIP information for one (1) year after the closing of an account, or the minimum amount of time according to relevant regulations. We will maintain contact information (full name and email) unless its removal is specifically requested by a user for statistical purposes to allow us to improve our business operations. A user may only request the removal of information relevant to their own account.