

[www.raccoononline.com](http://www.raccoononline.com)



# RACCOONLINE

Decentralized VPN

**WHITE PAPER**



<b>Introduction</b>	1
Global VPN Market: Size and Growth	1
Decentralized VPN (dVPN) Adoption Trends	2
Comparative Analysis of dVPN Platforms	3
Architecture and Network	3
Performance and Scalability	4
Privacy and Security	5
Decentralization and Governance	6
Tokenomics and Incentives	7
Usability and Ecosystem	8
Unique Features – RaccoonLine VPN Strengths	9
Overview of VPN Usage and Regulation in China	10
VPN Providers in China: Domestic vs. Foreign	11
Decentralized VPNs in China	12
<b>Technology</b>	13
Main Features	14
In-Depth Tech	15
Session Tunneling	16
Network performance prioritization	17
“Wandering Flow” Mode	19
RaccoonLine Routers	20
<b>Subscription Service</b>	21
Base subscription features	21
<b>ROCC Token</b>	22
ROCC Token Utility in the RaccoonLine Ecosystem	23
Payment for Services	23
Incentivizing Network Contributors	23
Staking and Network Reliability	24
Community Governance and Participation	24
Community Rewards and Developer Ecosystem	24
Tokenomics and Deflationary Mechanics	25
Interoperability and Future Utility	25
<b>LEGAL DISCLAIMER</b>	27
<b>TOKENOMICS</b>	29
TOKEN ALLOCATION	29
VESTING SCHEDULE	30



<b>FURTHER RISK FACTORS</b>	<b>39</b>
GENERAL REMARK	39
BUSINESS RISKS	39
OPERATIVE RISKS	39
LACK OF FINANCING OF THE COMPANY	41
REGULATORY AND LEGAL RISKS	41
FINANCIAL RISKS	42
TECHNOLOGICAL/ SECURITY RISKS	42
TAX RISKS	44
OTHER RISKS	44
<b>PRIVACY POLICY</b>	<b>45</b>
SECTION 1 – GENERAL CONDITIONS	45
SECTION 2 – DEFINITIONS	45
SECTION 3 - INFORMATION WE COLLECT AND PROCESS	46
SECTION 4 - HOW WE USE YOUR INFORMATION	48
SECTION 5 - PERSONAL DATA PROTECTION AND STORAGE	49
SECTION 6 - THIRD PARTIES	49
SECTION 7 - INTEGRATING THIRD PARTY SERVICES AND LINKS	50
SECTION 8 – PROTECTING CHILD'S PRIVACY	50
SECTION 9 - RETAIN INFORMATION	50
SECTION 10 - SECURITY	51
SECTION 11 - PRIVACY POLICY UPDATES AND AMENDMENTS	51
SECTION 12 – CONTACT US	51



## Introduction

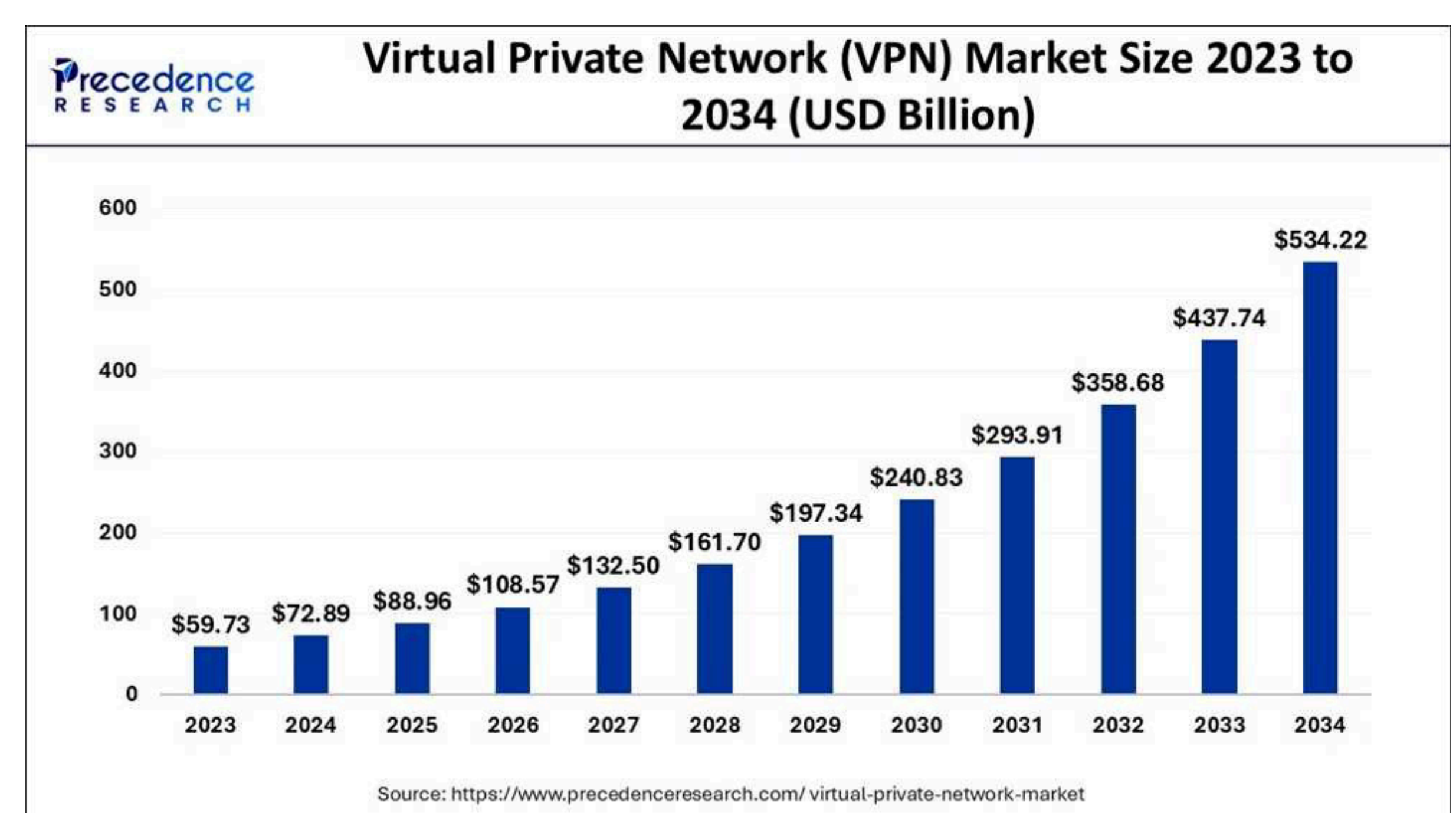
Raccoonline is a decentralized VPN (“DeVPN/DFS”) service with a decentralized file storage system, providing anonymous and secure data storage and Internet connection. Based on the principles of decentralized distribution and end-to-end encryption of traffic within the decentralized VPN network, which ensures a high level of data protection and user privacy.

## Global VPN Market: Size and Growth

Analysts report that the global VPN market has been expanding rapidly. One forecast values the market at about **US\$50.9 billion in 2023**, rising to roughly **US\$137.7 billion by 2030** ( $\approx 15.3\%$  CAGR). Another study estimates about **\$61.4B in 2024** to **\$71.7B in 2025** (CAGR  $\approx 16.7\%$ ), projecting about **\$154.1B by 2029**. A Grand View Research analysis similarly reported **\$41.33B in 2022** with  $\sim 17.7\%$  CAGR to 2030. These sources differ in scope, but all indicate strong growth.

The market is driven by widespread adoption (an estimated 30–40% of Internet users use VPNs), remote/hybrid work, streaming/gaming needs, and rising privacy/anti-censorship demand. Emerging markets and corporate security needs are key growth factors, and regions like Asia-Pacific (especially China) are forecasted to grow fastest.

- **Key Drivers:** Remote work and cloud migration (security for distributed teams), strict data/privacy regulations (GDPR and equivalents), and growing online surveillance or censorship in various countries. Increased cyberattacks and e-commerce growth also spur VPN usage.
- **Market Segments:** Both consumer and enterprise VPN services are expanding. New trends include secure mobile VPNs and multi-protocol VPNs. Notably, state actions (e.g. China’s crackdown) have paradoxically raised awareness and demand for VPN solutions.







## Decentralized VPN (dVPN) Adoption Trends

Decentralized VPNs are an emerging segment within the broader VPN market. Their users tend to be privacy-conscious and tech-savvy individuals, as well as communities under strict censorship. Empirical data show the largest dVPN user bases (measured by traffic sessions) are in the US, Iran, UAE, India, and UK. This mix includes both open societies (users wary of surveillance) and restricted ones (users needing censorship circumvention). Early adopters often come from the cryptocurrency and digital-rights communities, attracted by peer-to-peer architectures and pay-as-you-go models.

Markets with accelerating censorship (e.g. parts of the Middle East, Southeast Asia) are seeing faster dVPN uptake, driven by demand for uncensored access. In general, decentralized services remain niche compared to centralized VPNs, but interest is growing: for example, some projects report tens of thousands of nodes worldwide.

- **User Demographics:** High percentages of activists, journalists, diaspora, and privacy enthusiasts rely on dVPNs to protect anonymity and bypass content blocks. Enterprise or corporate users have been slower to adopt dVPNs, but decentralized models may appeal to organizations seeking censorship-resilient connectivity.
- **Regional Trends:** Adoption is strongest in countries with internet restrictions (e.g. Iran, UAE) and among global privacy advocates. The U.S., UK, and other Western markets also contribute sizable user traffic. Growth hotspots include Asia-Pacific and the Middle East, where both regulatory pressures and crypto interest converge.

Projects such as **Mysterium**, **Orchid**, **Sentinel**, **Deeper Network** and others now provide blockchain-based, peer-to-peer VPN services. These platforms typically offer token-based incentives to node operators and emphasize censorship resistance. Regulatory environments vary: for instance, China permits only state-approved VPNs (making many popular VPN services technically illegal), which has spurred interest in uncensorable, peer-run alternatives.





## Comparative Analysis of dVPN Platforms

### *Architecture and Network:*

- **Sentinel (SENT)** is built on a Cosmos-based blockchain framework. It provides an open infrastructure (Sentinel Service Chain) where independent dVPN applications interoperate. Sentinel uses a public node directory and leverages IBC/Handshake technologies (e.g. Handshake DNS, IPFS storage, Akash compute) to support a decentralized VPN layer. Node operators (validators or bandwidth providers) participate on the Cosmos Hub and utilize the SNT token for staking and payments.
- **Mysterium (MYST)** operates a permissionless peer-to-peer VPN marketplace built on Ethereum/Polygon. Its exit-node network spans tens of thousands of residences worldwide, and its VPN client supports standard protocols (WireGuard, OpenVPN) for Tor-like tamper-proof encryption. Developers can run nodes on common platforms (Docker, Raspberry Pi, etc.). Mysterium's infrastructure is entirely open source, with APIs that connect Web2/Web3 applications to the network.
- **Orchid (OXT)** uses an Ethereum-based model with a decentralized node directory and probabilistic nanopayments. Orchid clients construct multi-hop "onion" tunnels to relay traffic through random providers. Bandwidth providers stake OXT tokens in an on-chain registry so that they receive client traffic in proportion to their stake. Orchid's node directory is public on Ethereum, allowing any node to advertise service (but also making it susceptible to censorship). Orchid's design emphasizes pay-as-you-go micro-transactions and nanopayment channels instead of fixed subscriptions.
- **RaccoonLine (ROCC)** similarly uses a decentralized mesh of user-operated nodes and blockchain-based accounting. Each user session tunnels through dynamically chosen output nodes, with exit nodes rotating every session to thwart anti-VPN filters. A built-in **DAG (decentralized Acyclic Graph)** ledger records each node's bandwidth contribution and uses the ROCC token to reward participants. Unique to RaccoonLine are its optional DeVPN routers – dedicated hardware devices that act as secure home gateways and NAS (network-attached storage) connected to its decentralized file system. This provides **integrated file storage** alongside **hardware/software VPN service**.

In summary, **RaccoonLine** architecture combines features of P2P VPNs, faster, DAG-based ledger solutions and decentralized file storage, while other dVPNs (Sentinel/Mysterium/Orchid) focus primarily on bandwidth routing and rely on external solutions for storage.





## Comparative Analysis of dVPN Platforms

### *Performance and Scalability:*

- **Sentinel:** Built on the high-performance Cosmos SDK, Sentinel's blockchain can handle fast transaction throughput for payments and proofs of service. Its network is designed for scale through IBC interoperability (e.g. integrating Akash compute). However, Sentinel's user-facing dVPN throughput depends on independent apps (SentinelHub, SentinalsApps) rather than a built-in network size metric.
- **Mysterium:** With over 22,000 active nodes globally (as advertised), Mysterium has one of the largest dVPN networks. It uses high-speed VPN protocols (WireGuard/OpenVPN) to achieve Tor-comparable latency with higher throughput. By being permissionless, Mysterium can scale horizontally as anyone can spin up a new node. Monthly traffic throughput (~1 PB) and daily sessions (~67,000) have been reported. Scalability is aided by running nodes on lightweight hardware (Raspberry Pi, DAppNode, etc.); however, bandwidth depends on node availability and staking incentives.
- **Orchid:** Orchid's scalability relies on its nanopayment channels. The original Orchid whitepaper notes that the system could serve "a few million users" on today's Ethereum and expects to scale to billions with chain sharding. In practice, Orchid's throughput is constrained by the need for frequent microtransactions. On the positive side, Orchid's decentralized router selection (shuffle based on stake) enables load distribution; but it can suffer higher latency due to payment channel setup.
- **RaccoonLine:** RaccoonLine adds a "Network Performance Prioritization" algorithm that assesses adjacent nodes' throughput to optimize routing. For example, nodes transmitting  $\geq 1$  TB recently and close to high-priority neighbors get prioritized for new sessions. RaccoonLine also offers a "Wandering Flow" mode (traveling data stream) that randomizes the entire route on each access, enhancing anonymity without reliance on static nodes. These dynamic routing features aim to improve speed and resilience. Scalability for RaccoonLine will grow with the user base: as more participants run nodes (including via the dedicated routers), capacity increases. By being permissionless (similar to Mysterium), RaccoonLine can scale horizontally as anyone can host a new node on wide variety of devices. Unlike Orchid's limitations on Ethereum, RaccoonLine's use of an ExtraChain DAG Ledger (for the ROCC token) avoids per-transaction bottlenecks for payments.





## Comparative Analysis of dVPN Platforms

### *Privacy and Security:*

- **Sentinel:** Emphasizes provable privacy. Its framework ensures provable end-to-end encryption between user and exit node and provides a proof of bandwidth mechanism so nodes must cryptographically prove they forwarded data. Sentinel also highlights “proof of no-logs” (transparency via open-source code) and truly distributed exit/relay nodes. Governance of Sentinel (via Cosmos validators) helps mitigate malicious relays.
- **Mysterium:** Implements Tor-like anonymity by default. Its network is “tamper-proof, anonymous and encrypted like Tor”. Users’ traffic is encrypted using robust VPN protocols (WireGuard/OpenVPN) end-to-end. Mysterium’s use of residential IPs (millions of nodes across 135+ countries) provides untraceable geoshifting. There is no central log server: node operators cannot see complete user traffic. Mysterium’s security is further reinforced by staking and “Delegation Pool” (Tokenomics 2.0) which incentivizes honest nodes.
- **Orchid:** Focuses on anonymity and censorship resistance. It uses probabilistic onion routing: each packet is forwarded through a chain of Orchid nodes, with each hop paid via chained nanopayments. Users can change providers at any time (no centralized directory enforcement). Orchid does not log user activity, and since payments are made in cryptocurrency, there are no ISP-recognizable subscriptions. However, Orchid’s public node registry on Ethereum does expose all node IP addresses, which could be blocked by censoring adversaries. Orchid also offers optional VPN obfuscation (stealth nodes) to counter DPI.
- **RaccoonLine:** Provides strong, modern encryption and anonymity features. The protocol uses end-to-end encryption with elliptic-curve cryptography and per-session keys, ensuring that even intermediate nodes cannot decrypt traffic. RaccoonLine’s “Wandering Flow” mode (randomized multi-hop each session) further obfuscates user paths and thwarts flow-correlation attacks. All traffic is tunneled through the peer network (no central proxy), and no logs of user activity are retained on any node. It uses ExtraChain’s decentralized file storage (“ExDFS”) also stores user files anonymously across the network, reducing risk of centralized data leaks. In short, RaccoonLine matches or exceeds the privacy guarantees of its peers by combining strong cryptography with dynamic routing.





## Comparative Analysis of dVPN Platforms

### *Decentralization and Governance:*

- **Sentinel:** Runs on a public Cosmos chain, so its consensus and operations are decentralized across validator nodes. Its ecosystem is community-governed via on-chain proposals (Cosmos Hub/Governance) and has a “Sentinel Growth DAO” for ecosystem development. The network’s ownership of exit nodes is widely distributed, aligning with Sentinel’s vision of no single controlling entity.
- **Mysterium:** Completely permissionless and community-run. Anyone can spin up a node and start earning with MYST. There is no centralized authority; security comes from its cryptographic incentives. Mysterium’s tokenomics (staking/delegation) parallels a governance mechanism: stakers can vote on network upgrades and parameter changes. The project itself (Necto Labs) encourages open collaboration and funding via grants, but day-to-day network operation is community-driven.
- **Orchid:** Decentralized in design but with an informal governance. Orchid’s routing and payments are fully peer-to-peer, and token staking is the primary economic control. There is no on-chain DAO; decisions have historically been led by the Orchid Foundation. Because Orchid’s smart contracts (payment accounts, staking registry) are public, the system resists centralized control. However, Orchid’s network relies on Ethereum’s ecosystem for any governance signals (e.g. OXT holders can theoretically vote on upgrades through separate forums).
- **RaccoonLine:** Encourages users to launch and maintain their own nodes in fully decentralized model. The ROCC token is used purely as a reward mechanism and community involvement is encouraged (e.g. bug bounties, open beta testing). RaccoonLine network of exit and relay nodes is permissionless (any contributor can join and earn), and no central party routes user traffic. One distinction is RaccoonLine’s subscription model: unlike Orchid’s pure pay-per-packet, RaccoonLine requires a subscription for full network access. This hybrid model unites decentralization and regular subscription as more classic approach to monetization, but day-to-day operation remains distributed. Overall, RaccoonLine’s decentralization (independent nodes, no single point of failure) is comparable to peers, with added reward transparency via its ExtraChain DAG ledger.





## Comparative Analysis of dVPN Platforms

### *Tokenomics and Incentives:*

- **Sentinel:** The SNT token is used for payments and staking. Users pay SNT to dVPN node operators for bandwidth, and operators stake SNT to signal trustworthiness. Sentinel also proposed “network mining” rewards for nodes proving uptime/bandwidth, though its current utility is centered on access to Sentinel dVPN apps.
- **Mysterium:** MYST is the native utility token. Clients pay node operators in MYST for VPN data. Node runners and even token holders can earn by staking: Mysterium’s Delegation Pool lets operators and ordinary holders stake MYST to earn additional rewards. This dual-earn approach incentivizes both providing bandwidth and long-term holding. Mysterium’s updated tokenomics (v2.0) further cements staking as the main distribution of rewards.
- **Orchid:** OXT is an ERC-20 token used for micropayments and staking. Users must deposit OXT into a payment account to use Orchid; the token balance is then consumed per hop. Bandwidth providers lock up OXT as stake in a registry (stakes are time-locked) and receive traffic in proportion to their stake. This stake-weighted model secures the network: to dominate Orchid traffic, an attacker would need to acquire and stake a majority of OXT. Orchid thus ties economic incentive (earning via bandwidth) directly to tokenomics, without any recurring fees or subscriptions.
- **RaccoonLine:** RaccoonLine’s tokenomics are centered on its “Data-Network Mining” system. The ROCC token functions *solely as a reward and contribution token*. Participants earn ROCC by sharing bandwidth (as exit or relay nodes) and/or disk space. Each user’s contribution is recorded on-chain, and rewards are distributed fairly in ROCC. Unlike the purely pay-per-use Orchid or subscription-only VPNs, RaccoonLine blends both: subscribers pay a (fiat or crypto) fee for service, but node operators earn ROCC. This creates a mutual incentive: users who subscribe support the network, and operators earn tokens for keeping it running. By design, ROCC does not confer any debt claim or governance rights – it is strictly a utility reward token. In terms of tokenomics, RaccoonLine’s approach is simpler than Mysterium’s or Orchid’s: it avoids complex staking mechanisms and pays out directly for service rendered. This lowers barriers to entry (no need to pre-stake large amounts), at the cost of relying on a subscription model to support ROCC flow in network.





## Comparative Analysis of dVPN Platforms

### *Usability and Ecosystem:*

- **Sentinel:** Provides a suite of tools (SentinelHub, CLI, SDKs) for developers and users. Multiple independent dVPN apps (e.g. SentinelDVPN, Tachyon integration) have been built on its framework. However, adoption so far has been driven more by crypto-savvy users; there is no single branded consumer app. Documentation is comprehensive (whitepaper, guides) but the ecosystem remains in a growth phase.
- **Mysterium:** Offers user-friendly clients and node software. Its consumer app (MysteriumVPN) is available on Windows, Mac, Linux and Android, requiring minimal configuration. Running a node is similarly easy: Docker scripts or turnkey boxes (Avado, DAppNode) let anyone set up in minutes. The Mysterium team maintains detailed docs and developer guides, reflecting its open-source roots. These features make Mysterium relatively accessible to non-technical users and hobbyists.
- **Orchid:** Has mobile apps (iOS/Android) and desktop clients, with a clean pay-as-you-go interface. No subscription or account creation is needed – users simply fund an Orchid wallet and connect. The ecosystem is smaller but focused; Orchid’s web portal also exposes provider stats and allows topping up funds. Orchid’s documentation and community are well-established (audited smart contracts, developer docs), but running a node requires more crypto knowledge (staking contracts, setting fees).
- **RaccoonLine:** Emphasizes simplicity. A desktop client for Windows and MacOS and mobile client for Android and iOS is under development in beta phase. A key usability feature is the DeVPN router: by plugging in a preconfigured RaccoonLine router box, even non-experts can instantly secure an entire home network and access files via the integrated cloud NAS. This all-in-one hardware solution is unique – none of the other platforms bundle VPN with data storage. On the developer side, RaccoonLine is newer and has less of an ecosystem. It supports and encourages open beta tests and bug bounty programs participation for an active engagement of community in development. In summary, RaccoonLine’s user experience aims to be more turnkey (especially via routers) than purely software-only peers, trading off the “pay-as-you-go” flexibility of Orchid for the familiarity of subscriptions and hardware.





## Comparative Analysis of dVPN Platforms

### *Unique Features – RaccoonLine VPN Strengths:*

- **Integrated DeVPN Routers & NAS:** Unlike Sentinel, Mystery or Orchid, RaccoonLine offers dedicated hardware appliances that secure an entire LAN and double as decentralized storage servers. This holistic approach combines VPN and personal cloud storage in one device – a unique selling point in the dVPN space.
- **Wandering Flow (Dynamic Routes):** RaccoonLine’s “traveling data stream” rebuilds the circuit on every connection. This continuous path randomization adds a layer of anonymity beyond what static exit nodes provide, potentially making traffic analysis much harder than in fixed-route systems.
- **Performance Optimization:** The platform’s anonymous neighbor-speed assessment (performance prioritization) seeks to maximize throughput and stability by routing through high-capacity, reliable nodes first. This is an advanced feature not explicitly advertised by the others.
- **Transparent Rewards:** All contributions (bandwidth, storage) are immutably logged on-chain, and rewards are distributed in ROCC tokens with “transparency and equality”. This level of auditability in payout (via blockchain) is a clear strength over traditional VPNs and is comparable to, if not more straightforward than, Orchid’s stake-based system.
- **Decentralized File Storage:** RaccoonLine natively includes a DFS so users can store files across the network anonymously. In contrast, the other dVPN projects focus only on traffic routing; any file storage is left to third-party systems.
- **User-Friendly Onboarding:** With its subscription model and plug-and-play router, RaccoonLine lowers the barrier to entry. Users gain full service access by subscribing (much like buying a plan from a regular VPN), which may feel more familiar than Orchid’s crypto payments or Mystery’s staking model. Meanwhile, nodes earn ROCC simply by sharing bandwidth/storage – no complex staking required.

In summary, RaccoonLine holds its own against major dVPN projects. All platforms (Sentinel, Mystery, Orchid, RaccoonLine) share the core benefits of decentralization, strong encryption, and token incentives. Where RaccoonLine shines is in its integrated product design: it pairs VPN protection with home-network hardware and built-in cloud storage, and it incorporates novel routing strategies for speed and anonymity. These features, along with its transparent reward token, constitute RaccoonLine’s competitive edge in the evolving dVPN market.





## Overview of VPN Usage and Regulation in China

- **Government-Approved vs. Unapproved VPNs:** Only a few state-sanctioned providers may offer VPN-like services (mainly for enterprise use). These include major telecoms (China Telecom, China Mobile, China Unicom) and licensed partners. Domestic companies can “rent lines” with international gateways under strict regulation. All other VPNs (especially consumer services) are unapproved and illegal. Officially, individuals may only use government-approved “leased lines” or corporate VPNs. Unlicensed providers (including foreign VPN services) are subject to shutdown.
- **Regulatory Crackdowns:** Authorities regularly purge illegal VPN suppliers. For instance, in late 2017 a Taobao vendor was sentenced to 5.5 years for selling VPN software. App stores (Apple, Google) were ordered to delist foreign VPN apps. Reports indicate blocks on hundreds of services since 2017. Ahead of major political events, the government intensifies filtering, reducing speeds of VPN traffic.
- **Censorship Techniques:** The Great Firewall employs deep packet inspection (DPI) to identify and block VPN protocol patterns. For example, Tencent developers confirmed in 2023 that DPI filters VPN TLS handshakes (blocking known SNI server names). Known VPN server IP addresses are blacklisted, and DNS poisoning redirects or nullifies VPN domain lookups. In 2020 China began actively blocking modern techniques like TLS 1.3/Encrypted-SNI, making it harder for users to hide VPN endpoints. The result is that standard VPN protocols (OpenVPN, IPSec, WireGuard) are often detected and throttled.
- **Circumvention Methods:** Chinese users rely on a variety of workarounds. Many use obfuscation tools (e.g. Shadowsocks, Obfs4 proxies, TLS tunnels) to mask VPN traffic. Domain fronting (routing through major CDNs) was popular until it was curtailed. Users frequently employ dynamic ports, randomized domain names, or specialized censorship-circumvention apps (like Lantern or Tor bridges). Decentralized VPN apps similarly integrate such techniques. For example, allow tunneling OpenVPN through Shadowsocks to defeat DPI. Users also switch among multiple servers or nodes quickly when blocks occur. In effect, multi-hop routing and node diversity (hallmarks of dVPNs) inherently aid circumvention: if one exit node is blocked, the network can route through another.





## Overview of VPN Usage and Regulation in China

**Timeline of Key Events (2000s–2025):** China’s “Great Firewall” has progressively tightened controls on VPNs. In 2014–2015, official agencies were reorganized to supervise the internet. By 2017, regulators announced a nationwide VPN cleanup: MIIT directed ISPs to disallow personal/unapproved VPN services. In mid-2017, Apple was forced to remove hundreds of VPN apps from China’s App Store. The official ban on unlicensed VPNs took effect in early 2018 (deadline March 31, 2018). Since then, enforcement has intensified: for example, laws require all telecoms to block non-authorized VPN traffic.

## VPN Providers in China: Domestic vs. Foreign

- **Domestic Providers:** The only legal VPN-like services in China are offered by state-affiliated entities. Telecom giants and cloud vendors (China Mobile, China Unicom, China Telecom, Alibaba Cloud, Tencent Cloud, etc.) provide **enterprise VPN gateways** for Chinese companies. These comply with Chinese law and generally **do not allow access to uncensored global content**. For instance, Alibaba Cloud’s VPN Gateway explicitly permits only “intra-border” connections (China-to-China) to meet regulatory requirements. Such services use registered international links but must allow government supervision. In practice, domestic offerings are oriented to business data connectivity, not to consumer access of blocked websites.
- **Foreign Providers:** Western VPN companies (ExpressVPN, NordVPN, etc.) have no official license. Their apps are **banned in China’s app stores**, forcing Chinese customers to obtain software via alternative means. Many foreign VPN sites are blocked or redirect to marketing pages in Hong Kong. Users must often sideload APKs or use overseas accounts. Because these providers lack a mainland presence, Chinese law enforcement primarily targets local distributors. In recent years regulators have repeatedly **cracked down on illicit VPN marketplaces** (e.g. forcing e-commerce platforms to remove VPN vendors). Despite prohibitions, **demand persists**: Black-market VPN subscriptions and private network deployments (often using rural IPs or shadow networks) continue at low levels.
- **Market Share:** No foreign VPN is dominant inside China due to legal hurdles. Domestic VPN “alternatives” (like those bundled with security software) offer limited privacy and must comply with censorship rules. In essence, Chinese netizens seeking full internet access have only illegal options (personal VPN apps or decentralized tools), whereas official providers serve enterprise clients under oversight.





## Decentralized VPNs in China

**Decentralized VPN projects** (RaccoonLine, Sentinel, Mystery, Orchid, etc.) face an uphill battle under Chinese censorship:

- **Current Blocking:** Early testing suggests most dVPN traffic is detected and blocked similarly to centralized VPNs. For example, the Mystery team confirmed that as of 2023 their mobile app “does not currently work in China” – DPI on the TLS handshake blocks connections unless further obfuscation is added. In a controlled study, nodes located in China saw virtually no traffic: a Sentinel node in China logged 0 sessions (while Mystery and Tachyon China nodes logged only a few hundred to a couple thousand sessions over months). By contrast, servers in the US, UK, etc., attracted tens of thousands of sessions from Chinese clients (using foreign exit nodes). These results indicate the Great Firewall disrupts decentralized VPN traffic unless special measures are used.
- **Protocol Strategies:** Some dVPNs are designing features to evade censorship. For instance, nodes can use WireGuard or TCP port 443 to mimic HTTPS, or integrate Shadowsocks-style obfuscation. Tachyon’s proprietary UDP-based protocol proved somewhat more resilient: in one test its Chinese node served nearly 2,000 sessions, significantly more than Sentinel (OpenVPN) in the same environment. Multi-hop routing (offered by Orchid) can also help: even if a middle relay is blocked, the client can route via alternate paths. In practice, dVPN clients often incorporate switching among hundreds of exit nodes; frequent rotation means authorities must chase many IPs.
- **Market Entry Tactics:** To reach Chinese users, dVPN projects typically distribute apps outside official channels (e.g. through international app stores, VPN communities, or GitHub releases). They may localize interfaces (some provide Chinese language clients) and educate users on sideloading. Partnerships with proxy/VPN aggregators or privacy advocates could help raise awareness. Technically, RaccoonLine and peers might adopt proven circumvention libraries (Tor pluggable transports, domain fronting proxies) within their apps. In short, they combine blockchain-based economics with traditional anti-censorship tech to penetrate tightly controlled markets.

[www.raccoononline.com](http://www.raccoononline.com)



# RACCOONLINE

Decentralized VPN

**TECHNOLOGY**





## Main Features

- **Decentralized Network:** Raccoonline uses a decentralized network of nodes distributed throughout the world, which ensures a stable and fast connection without a single point of failure.
- **Decentralized Internet access:** network output nodes change with each session, ensuring user privacy and free access to information.
- **Invisible:** Raccoonline nodes are not tracked by traditional anti-VPN methods.
- **Collective reward system (“Network Mining”):** sharing their channel with other network participants, taking part in the network as an output or intermediate node, users receive rewards according to their contribution to the network. Blockchain is used to save data on user contributions, which ensures transparency and equality in the distribution of rewards. The ROCC token is a means of reward and a method of recognizing the user’s contribution to the network.
- **DeVPN Routers:** A key feature of the product is its own DeVPN routers, offered as an additional option for users. These routers provide secure connections to all devices on your home network, including smartphones, computers, gaming consoles, and smart devices. The router also functions as a home NAS (local network storage) connected to a decentralized file system, which gives permanent and independent access to stored files, through a client application or when logging in to another router.
- **Subscription:** To access the service, users can subscribe, which gives them full access to the functionality of the DeVPN service and the ability to use DeVPN routers. The subscription gives access to a limited amount of space in the decentralized file system, the size depends on the type of subscription.
- **Data Encryption:** Raccoonline uses end-to-end encryption to protect user data from illegal access and eavesdropping. This ensures complete confidentiality and security when transmitting information over the Internet.
- **Variety of output nodes:** The service provides access to a wide selection of servers around the world, allowing users to bypass geographic restrictions and access content not available in their region.



## In-depth Tech

Raccoonline is a DeVPN service that operates on a decentralized architecture, providing a high level of privacy and security for its users.

Using elliptic curve cryptography and a session key scheme, Raccoonline guarantees high data security and confidentiality of transmitted information.

Decentralized file storage system further strengthens security by ensuring anonymous storage of user data without the risk of centralized information leakage. Each user connects to the DeVPN network using unique session keys, which provides individual protection and privacy during the online session.

This approach not only protects against external threats, but also prevents possible attacks within the network, ensuring security at all levels.

Raccoonline demonstrates modern security standards, meeting current user requirements in the field of data protection and privacy on the Internet.



## Session Tunneling

Raccoonline provides a secure connection through a session tunneling technique based on the principle of limited knowledge of neighboring nodes.

This approach allows users to transfer data through an encrypted tunnel without revealing the full network topology or personal information of other participants.

Session tunneling ensures confidentiality and data protection, ensuring secure online interactions.

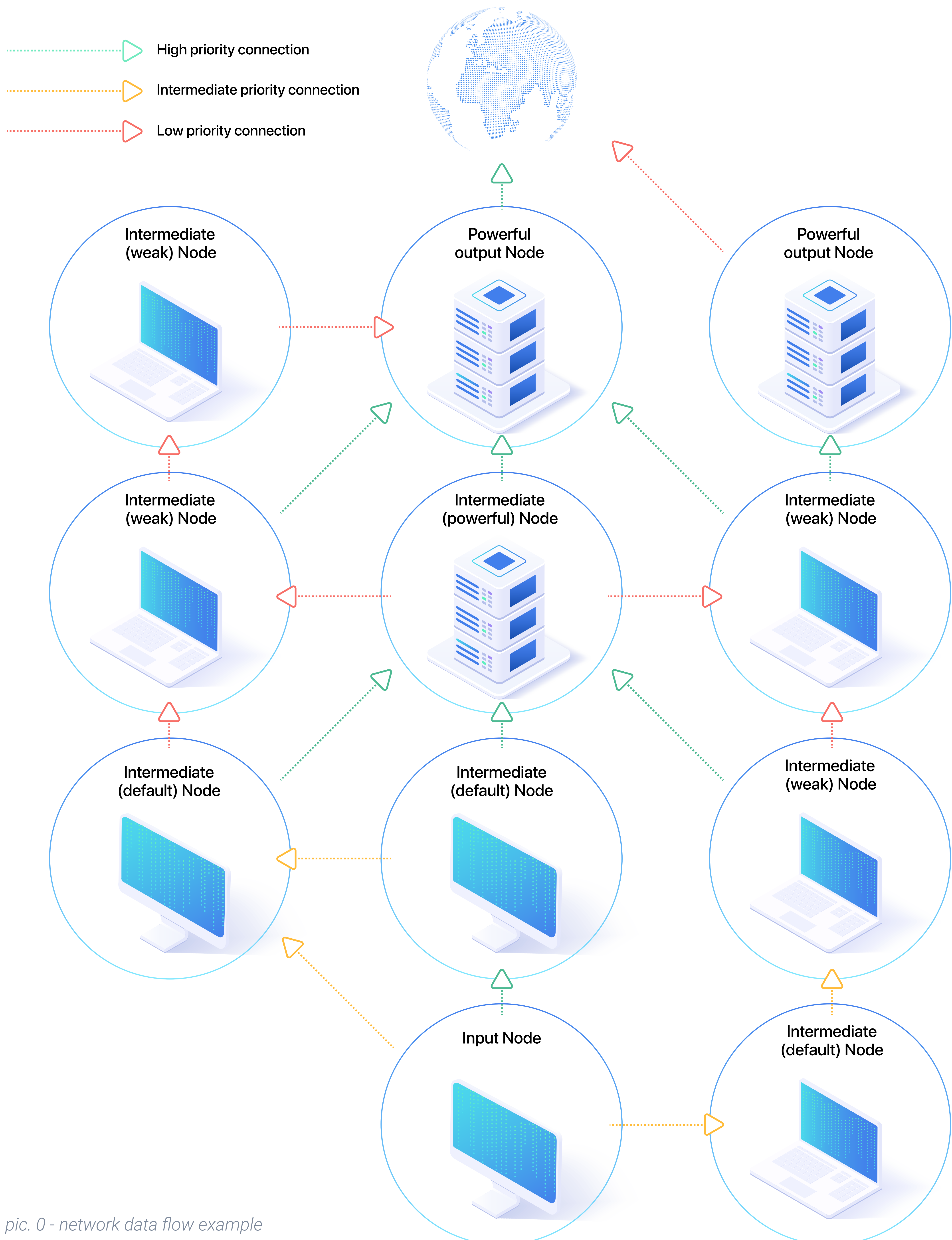
Each session establishes unique encryption keys, providing individual security for each connection.

This security method is actively used in Raccoonline, providing a high level of security and privacy for all users.





## Network performance prioritization



pic. 0 - network data flow example



The Raccoonline DeVPN network uses a technique for anonymously assessing the channels of neighboring nodes to increase the speed of the network.

**Nodes receive high priority if:**

- are online and have continuously transmitted 1 terabyte of data;
- having a high rating for network testing at launch;
- Located at a distance of no more than 1 node from a high-priority node;
- Located at a distance of at least 2 nodes from the low-priority node;

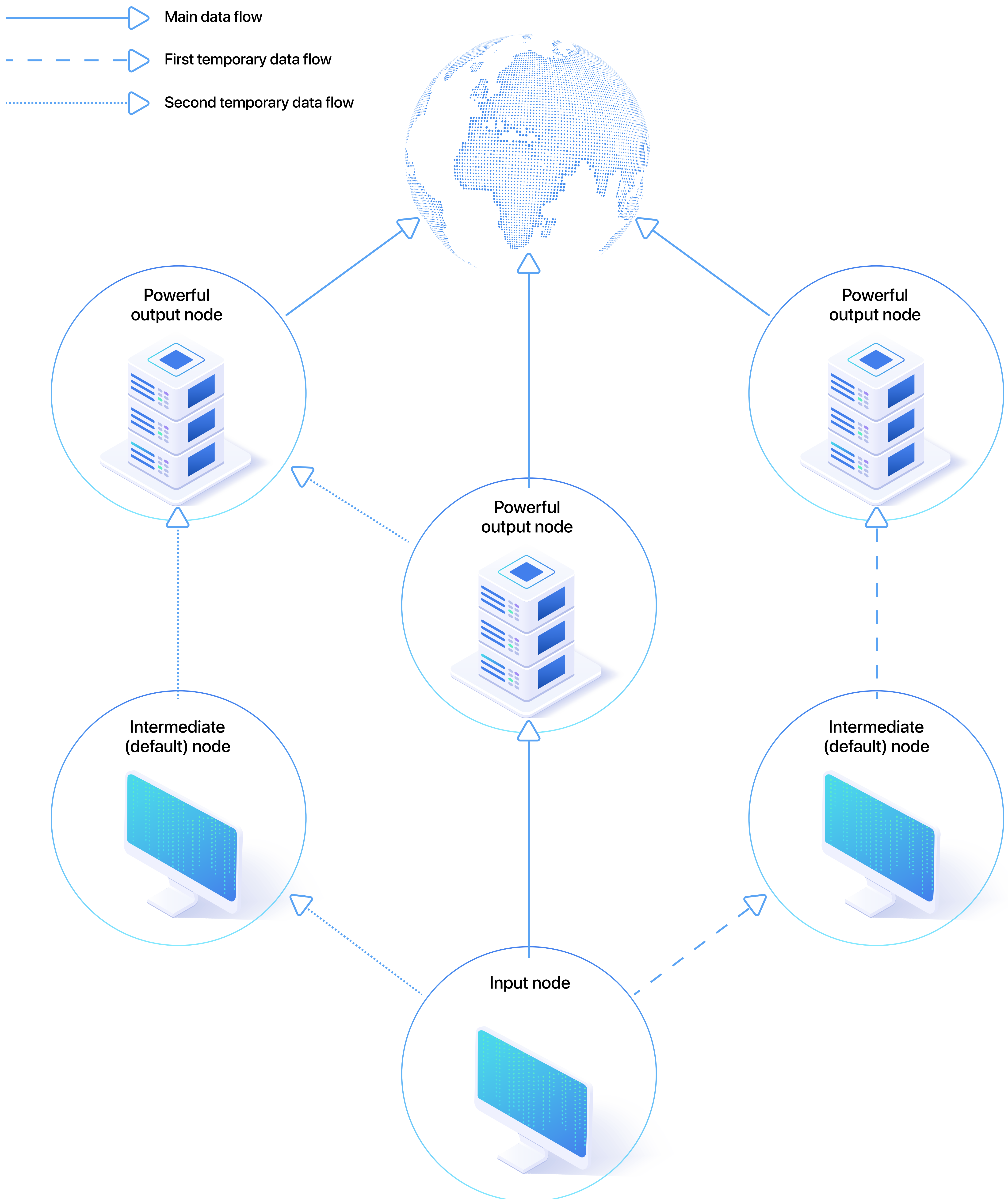
If 1 criterion is not met, the priority drops to medium; if 2 criteria are not met, the priority drops to low.

This ensures high performance when processing data for the end user/request sender.





### "Wandering Flow" Mode



pic. 1 - "Wandering flow" example, input node switches from main to temporary flow each time request is sent





The Raccoonline DeVPN offers a "traveling data stream" mode that generates unique routes through the decentralized network every time you connect or access a website.

This mode provides an additional level of anonymity and security, protecting users from possible traffic tracking and analysis.

By traversing different paths, each connection becomes difficult to distinguish and defies conventional monitoring methods. The "roaming data flow" mode makes the use of Raccoonline even more reliable and secure, ensuring the confidentiality and protection of user data on the network.

## Raccoonline Routers

DeVPN routers represent a key feature of the product. In the modern Internet, such complex solutions are becoming increasingly popular among users. They are offered as an optional extra, providing a reliable and secure connection to all devices on your home or office network. These routers help keep smartphones, computers, game consoles, and smart devices secure by creating a secure tunnel for data passing through the network.

In addition, DeVPN routers perform the functions of a home NAS (network-attached storage), providing constant access to stored files. They are connected to a decentralized file system, allowing for independence and data management directly from the home network. Users can easily access their files through the client application or log in to another router, providing flexibility and ease of use.

Using DeVPN routers on a home or office network allows users not only to ensure the security of their data, but also to manage it directly from their own home. This significantly improves the level of information security and reduces the risk of data leakage, which becomes especially relevant in the modern digital world, where privacy and data security are a priority for many users.





## Subscription Service

The subscription mechanism gives users access to the full functionality of the DeVPN service and the ability to use DeVPN routers for a fee.

The economic component of this mechanism is that users pay a subscription for a certain period of time (for example, monthly or annually), which provides a stable income for the Raccoonline service providers.

The amount of available space in a decentralized file system also depends on the subscription type chosen, which may encourage users to choose more expensive subscription plans to get more storage.

Thus, the subscription mechanism creates mutually beneficial conditions for users, providing them with access to the necessary functions and the ability to choose the optimal level of service in accordance with their needs, and also provides a stable income for participants and the Raccoonline network itself.

## Base subscription features

For example, with a subscription price of \$10 per month, a user can gain access to the full functionality of the DeVPN service, use DeVPN routers and have access to 100 GB of space in a decentralized file system.

The user who has paid for the subscription will be able to use the VPN service to bypass geographical restrictions, ensure Internet security and anonymity on the Internet. Additionally, he will be able to connect his devices to a DeVPN router to protect his entire home network.

Regarding the decentralized file system, the user will be able to upload, store and share files through this service, while having access to 100 GB of space to save their data.

Thus, for \$10 per month, a user gets access to a wide range of services provided by the DeVPN service, as well as limited file storage space on a decentralized network.



Sub type	Network Mining Power	Storage	VPN-router control panel	Wandering Flow
Without Sub	0.05x	-	-	-
Basic	0.25x	100 GB	+	-
Hi-Sec	0.5x	500 GB	+	+
Data Fortress	1x	1 TB	+	+

## ROCC Token

The "Network Mining" collective reward system is a mechanism that allows users to receive rewards for their participation in the network. Participants can share their channel and disk space with other users and participate as an exit or intermediate node. For this they receive rewards in proportion to their contribution to the network.

Blockchain is used to ensure transparency and equality in the distribution of rewards. This tool allows you to store data about user contributions to the network and provides a reliable system for recording and distributing rewards.

The ROCC token, in turn, acts as a means of reward and a method of recognizing the contribution of participants to the network. Users receive rewards in the form of ROCC tokens for their contribution to the network, which they can then use within the system.

The collective reward system encourages user participation in the network, ensuring that they are fairly rewarded for their contributions and promoting the development and efficient operation of the network as a whole. It creates conditions for active user participation in the overall process and ensures the stability and sustainability of the network in the long term.





## ROCC Token Utility in the RaccoonLine Ecosystem

The ROCC token is the economic backbone of the RaccoonLine decentralized VPN (dVPN) ecosystem. Designed as a pure utility asset, ROCC fuels core platform operations, incentivizes participation, and facilitates future ecosystem expansion across privacy-preserving services.

### Payment for Services

ROCC serves as the native payment medium within the RaccoonLine ecosystem. Users utilize ROCC to pay for premium VPN subscriptions, secure file storage, and enhanced messaging services. This creates a closed-loop economy, where value flows directly between users and network contributors without reliance on traditional payment systems.

The token's use as a payment method reinforces the privacy-first nature of the platform: transactions in ROCC eliminate the need for personal billing data, helping users remain anonymous. Importantly, ROCC carries no equity, profit rights, or governance privileges—its utility is strictly functional, ensuring compliance with global regulatory standards.

### Incentivizing Network Contributors

At the heart of the RaccoonLine dVPN model is a decentralized network of node operators who share bandwidth and storage to power user connectivity. These participants are rewarded in ROCC via a system called Network Mining.

Unlike energy-intensive proof-of-work systems, Network Mining is resource-efficient and accessible. By simply running RaccoonLine software on everyday devices, users can contribute spare bandwidth and disk space to the network and receive ROCC tokens in return. The contribution of each node is measured, verified, and recorded on-chain, ensuring transparent and fair reward distribution.

This design turns the act of securing the network into an opportunity to earn while you strengthen the system, creating a sustainable incentive structure for long-term participation.





## Staking and Network Reliability

Currently, RaccoonLine does not enforce traditional token staking to operate a node. Instead, the platform emphasizes performance-based incentives: nodes with higher uptime and throughput receive greater rewards and higher routing priority.

While no staking is required at this stage, the project roadmap anticipates optional staking mechanisms in future versions of the network (e.g., DeVPN routers or high-throughput relays). These may involve bonding tokens to increase operational capacity or access higher reward tiers, and possibly introduce slashing for misbehavior to further secure the ecosystem. This flexible approach allows RaccoonLine to maintain openness and inclusivity while laying the groundwork for more advanced network governance models.

## Community Governance and Participation

ROCC is not a governance token in its current form. Holders do not possess voting rights or protocol control. This design choice helps preserve ROCC's regulatory neutrality and allows for agile platform development.

That said, RaccoonLine emphasizes community-driven growth. Users are invited to propose features, report bugs (with rewards), and engage in ecosystem discussions. As the network matures, the project may introduce a DAO-based governance layer where ROCC holders could vote on development proposals, reward parameters, or community funding initiatives.

This phased governance model ensures stability in early growth stages while preserving the option for deeper decentralization over time.

## Community Rewards and Developer Ecosystem

Beyond mining, ROCC plays a central role in engaging the broader community. The project has allocated a portion of the total token supply to incentivize early adopters, testers, contributors, and builders.

Examples include:

- Bug Bounties: ROCC rewards for identifying vulnerabilities and reporting security issues.
- Referral & Social Quests: Gamified campaigns where users complete tasks to earn tokens.
- Telegram Game Integration: Casual users can earn ROCC through an integrated clicker game, easing them into Web3 through play.

Additionally, the token serves as a funding vehicle for third-party developers. Builders who create dApps or services that integrate with RaccoonLine infrastructure may apply for ROCC grants, ensuring a vibrant and expanding privacy tech ecosystem.





## Tokenomics and Deflationary Mechanics

ROCC has a fixed maximum supply of 100 million tokens, with no inflation beyond this cap. Tokens are distributed gradually through mining rewards and ecosystem incentives. To maintain long-term token value, RaccoonLine may implement deflationary mechanisms such as:

- **Token Burning:** A portion of ROCC used for subscriptions could be permanently removed from circulation.
- **Treasury Lockups:** Revenue may be held in reserve or reinvested into growth initiatives.
- **Emission Tapering:** Adjustments to the mining algorithm are planned to reduce issuance as network maturity increases.

These measures ensure that ROCC remains scarce and valuable, with its distribution aligned to the platform's long-term health and growth.

## Interoperability and Future Utility

ROCC is designed to be interoperable across blockchain networks. Planned exchange listings and bridge protocols will allow the token to exist in wrapped forms (e.g., ROCC-ETH, ROCC-BSC), making it tradable and usable across DeFi, NFT, and gaming ecosystems.

Looking ahead, ROCC will power additional modules within RaccoonLine, including:

- **DeVPN Routers:** Hardware-based node operators earning ROCC.
- **Decentralized File Storage (DFS):** Payments for data access and incentives for storage provision.
- **Encrypted Messaging:** Payments for premium features or large community hosting via the upcoming TrashTalk messenger.
- **Governance Rights:** Future DAO participation as decentralization deepens.

By anchoring payments, rewards, and potential governance in a single token, ROCC is positioned as the lifeblood of a self-sustaining privacy economy.

[www.raccoononline.com](http://www.raccoononline.com)



# RACCOONLINE

Decentralized VPN

**LEGAL**





## LEGAL DISCLAIMER

### NO PROSPECTUS OR OFFER TO INVEST IN OR PURCHASE A SECURITY OR FINANCIAL INSTRUMENT

The ROCC is designed as a pure payment token (cryptocurrency) and does therefore, according to their structure, not constitute a security or financial instrument. Nothing in this White Paper shall be deemed to constitute a prospectus or offer document for securities or financial instruments of any kind in any jurisdiction nor does it in any way pertain to an offering or a solicitation of an offer to buy any securities in any jurisdiction.

This White Paper is for project description and informational, illustration and discussion purposes only and does in no way provide an offer to sell or a solicitation of any offer to buy neither the planned ROCCs nor any security or other financial instrument. Furthermore, this White Paper does not constitute an investment recommendation to acquire ROCCs or for the disinvestment of other securities, financial instruments or other assets.

### ESTABLISHMENT OF A LEGAL RELATIONSHIP SOLELY ON THE BASIS OF INDIVIDUAL AGREEMENTS

This White Paper does not imply any elements of a contractual relationship. The content of this White Paper is not binding for the Company and is subject to change in line with the ongoing research and development of the Raccoonline VPN. Any legal relationship between a token purchaser of the planned ROCC and the Company is not established by this document but solely based on separate individual agreements and conditions, in which the rights and obligations of a token purchaser and the Company are ruled. In case of any ambiguities or contradictions the regulations of the individual agreement take precedence over the information contained in this White Paper.

### NO REPRESENTATION OR WARRANTY AS TO THE INFORMATION CONTAIN IN THIS WHITE PAPER

The information contained in this White Paper is for general understanding purposes only. This White Paper is for discussion and presentation purposes only. The Company endeavours to keep the information contained in this White Paper up-to-date and correct, however, the Company has no obligation to update or keep current any information or projections contained in this White Paper.





The Company does not make any representation or warranty of any kind as to the accuracy, completeness, reliability, suitability or availability of the information contained and the conclusions reached in this White Paper.

### **HIGH RISK OF LOSS**

The purchase of ROCCs involves considerable risks. Therefore, a token purchaser should not invest a substantial part of its assets for the purchase of ROCCs and should be economically able to cope with a total loss of the investment. A token purchaser should have experience with cryptocurrencies, in particular issued by start-up companies, and should be able to understand the economic and technical interdependencies of the entrepreneurial activities of Raccoonline and the ROCC and the impact on the value of the ROCC.

### **NO FINANCING THROUGH LOAN**

It is strongly advise against the financing of the purchase of ROCCs through a loan. The obligations to pay interest and amortisation remain even if the purchased ROCCs should become worthless.

### **THIS WHITE PAPER DOES NOT REPLACE COMPETENT ADVICE**

This White Paper merely gives an overview over the planned investment and business activities of The Company, the Raccoonline VPN and the planned ROCC. This Whitepaper does not constitute investment, economic, legal, tax, regulatory, financial, accounting or other advice, and is not intended to provide the sole basis for any evaluation of a transaction on acquisition of ROCCs. This White Paper cannot replace investment, economic, legal, tax, regulatory, financial, accounting or other advice. Prior to the acquisition of ROCCs, a token purchaser should independently assess any possible risks, seek advice with respect to the economic, legal, regulatory and tax implications of the purchase of ROCCs and should consult with his/her own investment, legal, tax, accounting or other advisors to determine the potential benefits, burdens, risks and other consequences of a purchase of ROCCs. The Company does not accept any liability with respect to the personal economic goals a token purchaser strives with the purchase of ROCCs.

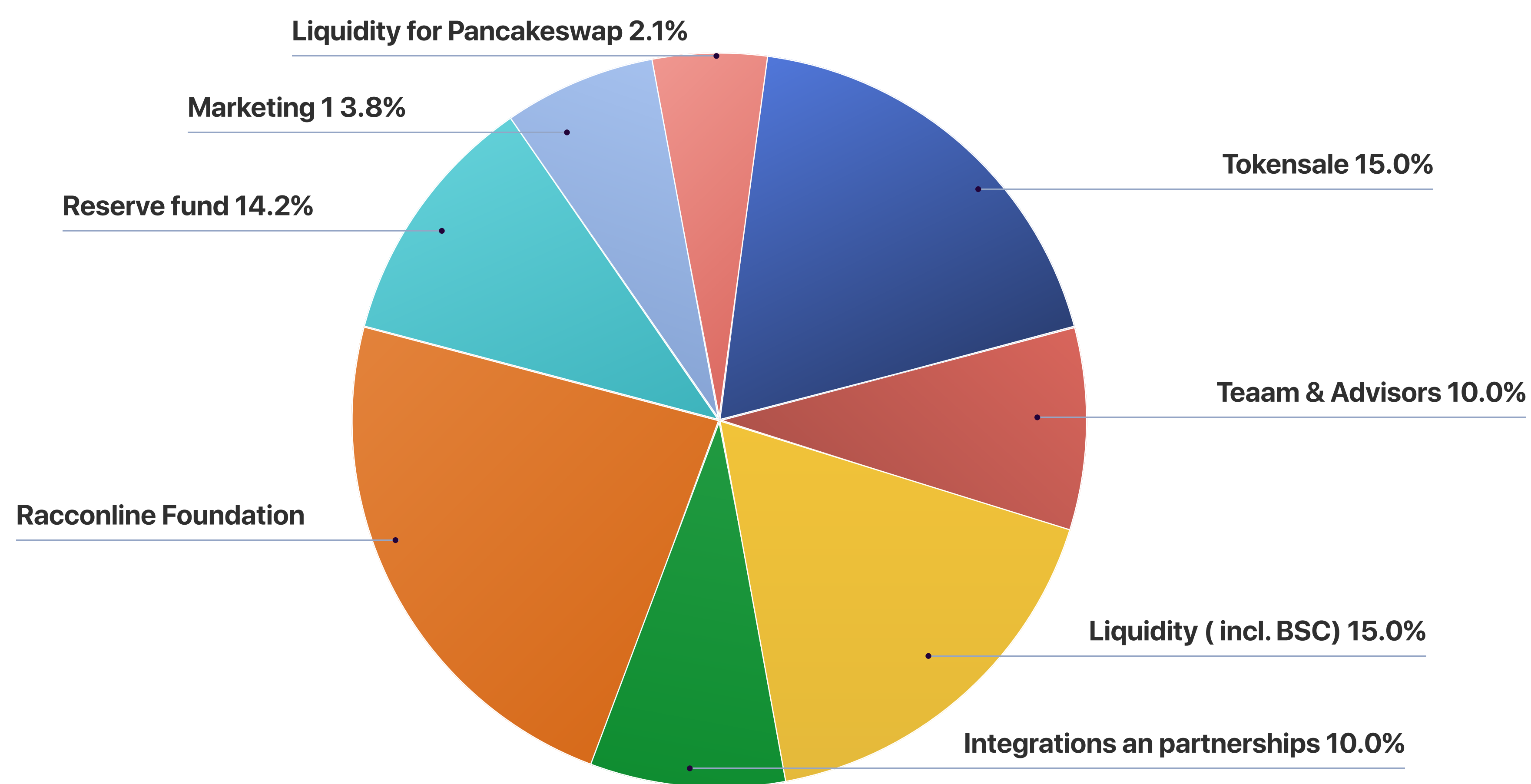




TOKENOMICS

TOKEN ALLOCATION

General Info	Description	ROCC	%
Tokensale		15.000.000	15.00%
Team & Advisors		10.000.000	10.00%
Liquidity (incl. BSC)	Funds to be used for providing liquidity on CEX and other DEX (except PancakeSwap)	15.000.000	15%
Intergrations and partnerships	Fund for partnerships	10.000.000	10.00%
RACCOONLINE Foundation	ROCC Ecosystem fund	30.000.000	30.00%
Reserve fund	Reserve fund	14.171.478	14.17%
Marketing 1	Marketing for tokensale	3.750.000	3.75%
Liquidity for PancakeSwap	To create liquidity pool on PanckeSwap	2.078.522	2.08
Tokensale		100.000.000	100%





TOKENOMICS  
VESTING SCHEDULE

	Unit	Total amount	Check	Sum	TGE
Total unlocked	ROCC	100.000.000	OK		6.141.166
Monthly unlock	ROCC	100.000.000	OK	100.000.000	6.141.166
Tokensale	ROCC	15.000.000	OK	15.000.000	1.437.644
- Seed	ROCC	4.157.044	OK	4.157.044	207.852
- Private	ROCC	10.115.473	OK	10.115.473	1.011.547
- Public	ROCC	727.483	OK	727.483	218.245
Liquidity for PancakeSwap	ROCC	2.078.522	OK	2.078.522	2.078.522
MARketing 1	ROCC	3.750.000	OK	3.750.000	1.312.500
Liquidity (incl.BSC)	ROCC	15.000.000	OK	15.000.000	1.312.500
Intergrations and partnerships	ROCC	10.000.000	OK	10.000.000	0
Team & Advisors	ROCC	10.000.000	OK	10.000.000	0
Reserve fund	ROCC	14.171.478	OK	14.171.478	0
RACCOONLINE foundation	ROCC	30.000.000	OK	30.000.000	0





VESTING SCHEDULE

	1 mon	2 mon	3 mon	4 mon	5 mon
Total unlocked	7.415.040	8,688,915	15,945,161	17,219,035	18,492,909
Monthly unlock	1.273.874	1,273,874	7,256,246	1,273,874	1,273,874
Tokensale	786.374	786,374	786,374	786,374	786,374
- Seed	207.852	207,852	207,852	207,852	207,852
- Private	505.774	505,774	505,774	505,774	505,774
- Public	72.748	72,748	72,748	72,748	72,748
Liquidity for PancakeSwap	0	0	0	0	0
MARketing 1	487.500	487,500	487,500	487,500	487,500
Liquidity (incl.BSC)	0	0	1,710,938	0	0
Intergrations and partnerships	0	0	1,250,000	0	0
Team & Advisors	0	0	1,250,000	0	0
Reserve fund	0	0	1,771,435	0	0
RACCOONLINE foundation	0	0	0	0	0



VESTING SCHEDULE

	6 mon	7 mon	8 mon	9 mon	10 mon
Total unlocked	32,761,656	33,548,030	34,261,656	40,957,654	41,671,280
Monthly unlock	14,268,746	786,374	713,626	6,695,998	713,626
Tokensale	786,374	786,374	713,626	713,626	713,626
- Seed	207,852	207,852	207,852	207,852	207,852
- Private	505,774	505,774	505,774	505,774	505,774
- Public	72,748	72,748	0	0	0
Liquidity for PancakeSwap	0	0	0	0	0
MARketing 1	0	0	0	0	0
Liquidity (incl.BSC)	1,710,938	0	0	1,710,938	0
Intergrations and partnerships	1,250,000	0	0	1,250,000	0
Team & Advisors	1,250,000	0	0	1,250,000	0
Reserve fund	1,771,435	0	0	1,771,435	0
RACCOONLINE foundation	7,500,000	0	0	0	0





VESTING SCHEDULE

	11 mon	12 mon	13 mon	14 mon	15 mon
Total unlocked	42,384,905	56,580,904	57,294,529	58,008,155	64,704,153
Monthly unlock	713,626	14,195,998	713,626	713,626	6,695,998
Tokensale	713,626	713,626	713,626	713,626	713,626
- Seed	207,852	207,852	207,852	207,852	207,852
- Private	505,774	505,774	505,774	505,774	505,774
- Public	0	0	0	0	0
Liquidity for PancakeSwap	0	0	0	0	0
MARketing 1	0	0	0	0	0
Liquidity (incl.BSC)	0	1,710,938	0	0	1,710,938
Intergrations and partnerships	0	1,250,000	0	0	1,250,000
Team & Advisors	0	1,250,000	0	0	1,250,000
Reserve fund	0	1,771,435	0	0	1,771,435
RACCOONLINE foundation	0	7,500,000	0	0	0



VESTING SCHEDULE

	16 mon	17 mon	18 mon	19 mon	20 mon
Total unlocked	65,417,779	66,131,405	80,327,403	80,535,255	80,535,255
Monthly unlock	713,626	713,626	14,195,998	207,852	0
Tokensale	713,626	713,626	713,626	207,852	0
- Seed	207,852	207,852	207,852	207,852	0
- Private	505,774	505,774	505,774	0	0
- Public	0	0	0	0	0
Liquidity for PancakeSwap	0	0	0	0	0
MARketing 1	0	0	0	0	0
Liquidity (incl.BSC)	0	0	1,710,938	0	0
Intergrations and partnerships	0	0	1,250,000	0	0
Team & Advisors	0	0	1,250,000	0	0
Reserve fund	0	0	1,771,435	0	0
RACCOONLINE foundation	0	0	7,500,000	0	0

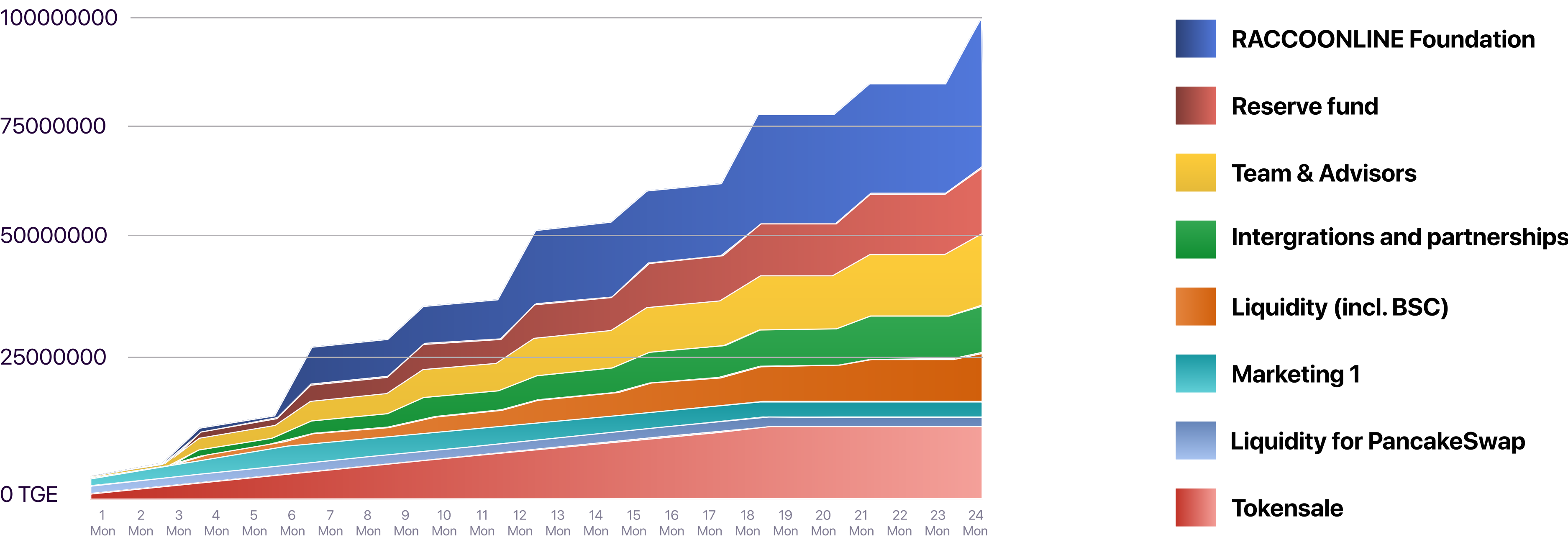




VESTING SCHEDULE

	21 mon	22 mon	23 mon	24 mon
Total unlocked	86,517,628	86,517,628	86,517,628	100,000,000
Monthly unlock	5,982,372	0	0	13,482,372
Tokensale	0	0	0	0
- Seed	0	0	0	0
- Private	0	0	0	0
- Public	0	0	0	0
Liquidity for PancakeSwap	0	0	0	0
MArketing 1	0	0	0	0
Liquidity (incl.BSC)	1,710,938	0	0	1,710,938
Intergrations and partnerships	1,250,000	0	0	1,250,000
Team & Advisors	1,250,000	0	0	1,250,000
Reserve fund	1,771,435	0	0	1,771,435
RACCOONLINE foundation	0	0	0	7,500,000

ROCC VESTING CHART



## **ALCULATIONS, FORECASTS AND FORWARD-LOOKING STATEMENTS**

The information set forth in this White Paper may not be exhaustive. The calculations and forecasts in this White Paper are essentially based on the experiences or assessments of the management of the Company. In this respect, this White Paper contains forward-looking statements, in particular subjective objectives of the future business development, which are associated with uncertainties and risks. Opinions, assumptions, assessments, (forward-looking) statements or the like reflect the current state of perceptions and expectations of the Company and constitute only subjective views, beliefs, outlooks, estimations or intentions of the Company. These perceptions and expectations may contain perception errors and errors of assessment and thus prove to be incorrect. The calculations were made with care and with commercial caution. Nevertheless, it cannot be excluded that events or developments, which were not taken into account within the calculations and forecasts, lead to significant deviations of the actual results of the Company and thus possibly to a deterioration in the value of the Raccoonline VPN and the planned ROCCs. Opinions, assumptions, assessments, (forward-looking) statements or the like should not be relied on, are subject to change due to a variety of factors, including fluctuating market conditions and economic factors, and involve inherent risks and uncertainties, both general and specific, many of which cannot be predicted or quantified and are beyond the control of the Company. Therefore, there can be no assurance that the events and developments described in this White Paper can be achieved. The token purchaser bears the risk of deviating events and developments.

## **RACCOONLINE, RACCOONLINE VPN AND ROCC**

The Company and the Raccoonline VPN have limited operating history, which makes it hard to evaluate its ability to generate revenue through operations.

The Company may be forced to cease operations for some reason. The Company may not successfully develop, market and launch the Raccoonline VPN and the ROCC and even if launched the Raccoonline VPN and the ROCC may not be widely adopted, may have limited users, could be subject to significant competition and may not be successful and not meet the expectations.

The Company exclusively offers to facilitate mediation of services and the handling of payments but is in no way responsible for the execution of the facilitated service via the Raccoonline VPN.



The ROCC is a payment token (cryptocurrency) which does not substantiate any debt claim against the Company and comprises no further rights neither vis-à-vis the Company nor third parties, in particular no participation or membership rights, no voting rights, no ability to influence the Company's decisions, no dividend rights, no subscription rights, no usage / utility rights and no access to services. ROCC does not represent an investment or a share in the Company. ROCC purchasers have no claim to any benefits and no right to return acquired ROCCs to the Company.

There is no assurance that ROCCs retain their value. There is no assurance that token purchasers will receive a return on or of their investment and are able to sell their ROCCs. Rather, there is the risk of deterioration in the value and a total loss of the investment.

Prices of tokens as the ROCC are extremely volatile, especially over short time horizons, and fluctuations in the price, which are to be expected, could materially and adversely affect the Company's business.

## **RESTITUTION AND REPAYMENT EXCLUDED**

Because ROCC is a mere payment token, restitution of ROCC to the Company and repayment of the purchase price by the Company are explicitly excluded. Purchasers of ROCC must therefore take into account that the money used to purchase ROCC might be tied in ROCC and can only be changed in fiat currencies or other cryptocurrencies via trading systems of third parties, insofar as such trading systems are available. Unless a third party is willing to acquire ROCC from the purchaser against fiat currencies or other cryptocurrencies, the purchaser of ROCC cannot sell ROCC and the acquired ROCC might become useless or worthless to the purchaser.

## **TRADEABILITY AND VALUE FLUCTUATIONS**

Tradability of ROCC cannot be guaranteed. Although the Company aims that the ROCC will be listed on one or several trading systems for trading, it cannot be excluded that the Company fails to find one or several trading systems who are willing or able to list the ROCC for trading. Even if the Company succeeds to list the ROCC for trading at one or several trading systems, it cannot be excluded that because of the absence of buyer or seller no trading will take place.



Even if the Company succeeds to list the ROCC on one or more trading systems for trading, it must be expected that the trading price and thus the value of the ROCC will be subject to substantial short-term fluctuations. Furthermore, it cannot be excluded that trading prices and thus the value of the ROCC will develop very differently on different trading systems. The development of the value of the ROCC on trading systems may also be affected massively by the development of the value of other cryptocurrencies, such as e.g. Bitcoin or Ether, even if the operating business of the Company provides no reason or starting point for any changes in value.

The Company does not guarantee that a trading system, in which the ROCC is listed, will perform or offer a transparent determination of the price or will be in the position to meet legal or regulatory requirements. The purchaser of ROCC must further consider that the trading of acquired ROCC probably will incur costs, which will have to be covered by the purchaser and which will further affect the value of the purchased or traded ROCC.

## **REGULATORY RISKS, NO REGULATORY AUDIT OR CLEARANCE**

Currently, no specific regulations or legal requirements exist with respect to the content of this White Paper. Accordingly, this White Paper is not composed in accordance with, and is not subject to, laws or regulations of any jurisdiction, which are designed to protect investors. The content of this White Paper and its structure are solely based on the decisions of the management of the Company.

The Company assumes that the ROCC qualifies as a mere payment token and that the issuance, sale and purchase of ROCC and the payment of services via the Raccoonline VPN with ROCC – in each case performed by non-excluded third parties – is not subject to regulation and not subject to approval by any government agency. However, the legal environment of blockchain projects, distributed ledger technologies, smart contracts and their applications, in particular sales of cryptocurrencies (ROCC), is complex, evolving and not clearly regulated, neither national nor international. Therefore, it cannot be excluded that due to national or international regulatory or legal action or by reason of new jurisprudence, the issuance, acquisition, management (including trade) of or payment for products or services with cryptocurrencies is legally qualified differently, prohibited in whole or in part or possible only under certain conditions. The legal situation, thus, may change. This can lead to significant negative effects on the Company's business model and the development of the value of the Company and the ROCC, e.g. in the case of a repatriation of ROCC or termination of the business operations as the result of an official directive and the bankruptcy of the Company and to the total loss of the investment.



Furthermore, it cannot be excluded that third parties, who are offering the trading of cryptocurrencies such as the ROCC on their platform are prohibited to further offer their services as a trading platform in general or without an official permit, so that there might not be any trading platforms anymore to trade or exchange the ROCC into other cryptocurrencies or fiat currencies. Also this might result that ROCC become worthless.

## **FURTHER RISK FACTORS**

### **GENERAL REMARK**

Any IEO process involves risks that cannot be eliminated. The risks described hereinafter should not be considered as all the risks that exist. There may be additional risks that are not known or considered immaterial at this time, but if they do occur, they could have a substantially negative effect on the operation of the business, the operating results, or the financial situation of the Company. The order in which the risks are related, should not be interpreted as an index that indicates its possibility or that indicates its level of materiality.

Each investor invests at its own risk.

### **BUSINESS RISKS**

The capital invested in the IEO is not guaranteed and could in an extreme case be entirely lost. The projects financed through the funds collected through the IEO are at an early stage of development and based on assumptions that could turn out to be overly optimistic or just unrealistic. There is no way to anticipate with certainty the success of the projects and the Company at the time of investing in the IEO. It is also possible that the blockchain and the Company's tokenized ecosystem (the Raccoonline VPN) will not be used by many individuals, companies and other entities or that there will be limited public interest in the creation and development of the Raccoonline VPN. Such a lack of use or interest could negatively impact the development of the Raccoonline VPN and the potential utility of the token, including its utility for obtaining services.

### **OPERATIVE RISKS**

The Company is a start-up and has just a short operating history against which purchasers of the token may consider the appropriateness of purchasing the token.



Many risks and uncertainties affect start-up and early stage companies, which often have very limited operating history, profits or cash flow. There can be no assurance of the success of such enterprises. Their potential must be considered in light of the problems, expenses, difficulties, complications and delays frequently encountered in connection with new or developing businesses, including technology risks, unproven business models, untested plans, uncertain market acceptance, competition and lack of revenues and financing.

The technological fields and markets that many start-up and early stage companies address have undergone and are expected to continue to undergo rapid and significant change. Rapid technological developments may result in the technology of companies becoming obsolete, uneconomical or uncompetitive before any commercial success or financial return can be achieved. Numerous other risks may affect developing companies and ventures, including risks that products or services will be found to be ineffective, unreliable, unsafe or uncompetitive and risks that such companies' technologies, products or service will not achieve market acceptance or penetration. Market acceptance of new products, services or technologies depend on many factors and uncertainties and cannot be assured.

In a start-up business, the loss or disability of a key person(s) can result in significant financial hardship, in some cases the failure of the company. More than other businesses, start-ups are highly dependent on the skills and contributions of very few key employees.

Any projections, forecasts, plans or other forward-looking statements are subject to numerous risks, uncertainties, changing circumstances and other factors that could cause actual results, performance, plans, prospects, operations and opportunities to differ materially from any forward-looking statements, including competition, inability to identify and do business with appropriate customers, existing and future law and regulations, liabilities under the securities laws, inability to hire, retain or qualify sufficient management and staff, general economic conditions, rapid technological change, cost overruns, delays in bringing products or services to market, marketing failures, difficulty in penetrating markets, delays or failures in developing anticipated capabilities, products or services, failure to obtain necessary regulatory approvals, insufficient funding, lack of availability of capital, rates of economic growth, levels of consumer and business spending, conditions in the technology and financial industries, dependence on strategic partners and business relationships, unproven business models, adverse developments affecting customers and end-users, fluctuations in securities markets and valuations, limited marketing, expansion risks, losses and costs, uncertain revenues and profitability, conditions in particular industries, accounting problems, costs, delays and liabilities arising from legal proceedings, failure to obtain and maintain intellectual property or proprietary rights and management failures.



## **LACK OF FINANCING OF THE COMPANY**

The Company as a young company depends on generating adequate funding for the development and expansion of the business (including the maintenance of an infrastructure for using the token). Should the Company not be successful in generating adequate funding, e.g. in the event of failure of the IEO, there is a risk that the Company cannot develop and expand its business operations as planned and as the case may be has to wholly or partly cease its business operations or even declare itself insolvent. Such a development could have a lasting negative effect on the usability or intrinsic value of the token until they become useless or worthless.

## **REGULATORY AND LEGAL RISKS**

Reference is made to the information in the Legal Disclaimer section above.

The token is not being structured or sold as securities or any other form of investment product. Accordingly, none of the information presented in this Whitepaper is intended to form the basis for any investment decision, and no specific recommendations are intended. The Company expressly disclaims any and all responsibility for any direct or consequential loss or damage of any kind whatsoever arising directly or indirectly from:

- reliance on any information contained in this White Paper;
- any error, omission or inaccuracy in any such information;
- or any action resulting from such information.

The regulation of IEOs is in development and at different stages of maturity in different markets. Further regulatory developments are expected to take place during 2020. In this dynamic regulatory environment, the Company does every effort to comply with known regulations, to anticipate regulatory trends, and to promote an IEO practice that grants best possible consumers' / investors' protection, accordingly. There is a risk that the regulation may develop in a way unfavorable to IEO and IEO participants. By no means are investors protected in their investments to a level comparable to when investing in fully regulated financial products. This risk is amplified in the case of international investors and due to the significant differing status of IEO regulations internationally.

It is possible that, due to any number of reasons, including, but not limited to, an unfavorable fluctuation in the value of Bitcoin, Ether, or other cryptocurrencies, decrease in token's utility (including its utility for obtaining services), the failure of commercial relationships, or intellectual property ownership challenges, the Raccoonline VPN may no longer be viable to operate and the Company may dissolve.



It could be, as a way of illustration, that regulatory actions could negatively impact the Raccoonline VPN and the token through a determination that the token is a regulated financial instrument that requires registration or licensing. The Raccoonline VPN may cease operations in a jurisdiction, or undergo significant redefinitions, if such regulatory actions make it commercially undesirable to obtain the necessary regulatory approval(s) to operate in such jurisdiction.

Investors are obliged to identify themselves prior to purchasing the token in accordance with the anti-money laundering regulations and regulations on the financing of terrorism and on tax evasion and to this end to disclose its personal data to the Company. Investors of the token should anticipate that the company may be compelled to disclose such personal data collected to competent authorities, because of national or international official or statutory measures.

## **FINANCIAL RISKS**

In a first phase, the token is intended to be used solely on the Raccoonline VPN and the Company does not support or otherwise facilitate any secondary trading or external valuation of it. This restricts the contemplated avenues for using the token to obtain Services or access the Raccoonline VPN, and could therefore create illiquidity risk for the token holders. When secondary trading of the token is facilitated by third party exchanges, such exchanges may be relatively new and subject to little or no regulatory oversight, making them more susceptible to market-related risks.

Furthermore, to the extent that third-parties do ascribe an external exchange value to the token, such value may be extremely volatile (as evidenced by price fluctuations in other crypto assets) and diminish to zero. It also possible that no secondary exchange develops for the token or that the terms of exchange turn out to be extremely negative for the token holders. Then, the trading of the token or their exchange into national currencies (fiat) may be subject to limitations. Finally, unlike bank accounts or accounts at some other financial institutions, the token is uninsured unless the holder specifically obtains private insurance to insure it. Thus, in the event of loss or loss of utility value, there is no public or private insurance arranged by us, to offer recourse to the holder.

## **TECHNOLOGICAL/ SECURITY RISKS**

The investor bears the entire responsibility regarding the secure storage of the private key (necessary to access and use the token).



The loss or theft of the private key means loss of the token. The distributed ledger or blockchain technology that underpins the token is still largely untested. There may be flaws in the code or programs that are used to create, transfer or store the tokens. Investors may not be able to access or control their tokens, or the tokens may be stolen, e.g., in case of a hack. More generally, the technology may not function quickly and securely, e.g. during peaks of activity.

Because the token and the Raccoonline VPN outer interactions are based on the Binance Smart Chain (BSC) protocol, any malfunction, breakdown or abandonment of the Binance Smart Chain (BSC) protocol may have a material adverse effect on the Raccoonline VPN or token. Moreover, advances in cryptography, or technical advances such as the development of quantum computing, could present risks to the token and the Raccoonline VPN, including the utility of the token for obtaining services, by rendering ineffective the cryptographic consensus mechanism that underpins the Binance Smart Chain (BSC) protocol.

The smart contract system has been, on a reasonable effort basis, audited and approved by technical experts. The technical experts have confirmed that the smart contract system has, with regard to both accuracy and security, been programmed according to the current state of the art. However, the investor understands and accepts that smart contract technology is still in an early development stage and its application of experimental nature which carries significant operational, technological, financial, regulatory and reputational risks. Accordingly, the investor understands and accepts that the audit does not amount to any form of warranty, including direct or indirect warranties that the smart contract system is fit for a particular purpose or does not contain any weaknesses, vulnerabilities or bugs which could cause, inter alia, the complete loss of tokens.

As with other decentralized cryptographic tokens based on the Binance Smart Chain (BSC) protocol, the tokens are susceptible to attacks by miners during validating token transactions on the Binance Smart Chain (BSC) blockchain, including, but not limited, to double-spend attacks, majority mining power attacks, and selfish-mining attacks. Hackers or other malicious groups or organizations may attempt to interfere with the Raccoonline VPN or token in a variety of ways, including, but not limited to, malware attacks, denial of service attacks, consensus-based attacks, Sybil attacks, smurfing and spoofing. Any successful attacks present a risk to the Raccoonline VPN and token, including, but not limited to, accurate execution and recording of transactions involving the token.

It is possible that alternative platforms could be established that utilize the same open source code and protocol underlying the Raccoonline VPN and attempt to facilitate services that are materially similar to the Services.





The Raccoonline VPN may compete with these alternative platforms, which could negatively impact the Raccoonline VPN and the token, including the token's utility for obtaining Services.

The Raccoonline VPN is still under development and may undergo significant changes over time. We may have to make changes to the specifications of the token or the Raccoonline VPN for any number of legitimate reasons. This could create the risk that the token or the Raccoonline VPN, as further developed and maintained, may not meet your expectations at the time of acquiring the token. Furthermore, despite our good faith efforts to develop and maintain the Raccoonline VPN, it is still possible that the Raccoonline VPN will experience malfunctions or otherwise fail to be adequately developed or maintained, which may negatively impact the Raccoonline VPN and the potential utility of the token, including its utility for obtaining services.

## TAX RISKS

The tax characterization of tokens is under development in different jurisdictions and may vary even within jurisdiction. Investors and token holders must seek their own tax advice in the relevant jurisdictions in connection with acquiring tokens, which may result in adverse tax consequences, including withholding taxes, income taxes and tax reporting requirements. The possibility should not be excluded therefore that transactions with cryptocurrencies both with the Company and with buyers lead to tax burdens that put a strain on the operational activities of the company or the usability or intrinsic value of purchased token until they become useless or worthless.

## OTHER RISKS

Because the token confers no governance rights of any kind with respect to the Raccoonline VPN, all decisions involving the Raccoonline VPN will be made by the Company at its sole discretion, including, but not limited to, decisions to discontinue the Raccoonline VPN, to offer more tokens for use in the Raccoonline VPN, or to liquidate the Company. These decisions could adversely affect the Raccoonline VPN and the utility of the token, including the token's utility for obtaining services.

Each of the risks represented can have lasting negative effects on the usability and intrinsic value of the token in its own right. The possibility is not excluded of several risks simultaneously materialising, mutually triggering or reinforcing each other and thus further increasing the lasting negative effects. Both the materialisation of individual risks and the materialisation of cumulative risks can lead to the complete uselessness or worthlessness of the token.





## PRIVACY POLICY

Last Updated: 27th May 2025

Please read carefully this Privacy Policy as it affects your obligations and legal rights. This Privacy Policy is an independent legal document. Your rights and obligations when you use Raccoonline project infrastructure, including the Raccoonline project Services, Websites and Apps maintained at <https://raccoonline.com> (hereinafter the “**Website**”), are also defined by the following documents (agreements): THE RACCOONLINE PROJECT USER AGREEMENT, any other terms we let you know about. The absence of one document or all of the listed documents doesn't affect the validity of this Privacy Policy.

### SECTION 1 – GENERAL CONDITIONS

Our Privacy Policy governs the terms of using the Raccoonline project infrastructure, including the Raccoonline project Website, and/or participation in the Raccoonline project, general rules of User's Personal Data processing by the Website Owner. Any terms not defined in our Privacy Policy, have the meaning as specified in THE RACCOONLINE PROJECT USER AGREEMENT.

We follow all legal requirements to protect your privacy. Our Privacy Policy is a legal statement that explains what information of yours we will collect when you use the Website and/or participate in the Raccoonline project, how the information will be used, and how we will share and protect the information.

EACH USER MUST CAREFULLY READ AND COMPLY WITH THIS POLICY.

By using the Website and/or acquiring ROCC token (tokens) you confirm that you agree to these Terms of Our Privacy Policy. If you do not agree with this Privacy Policy in general or any part of it, you should withhold from using the Website and/or acquiring ROCC token.

YOU ALSO AGREE THAT ANY INFORMATION ABOUT YOU, COLLECTED BY US IS TRANSFERRED WITH YOUR CONSENT.

You provide and guarantee to us the right to process your personal data, including the right to perform the following actions to process your personal data (fully or partially in an automated system): storing, registration, changing, restoring, and removing. Also you agree that your personal data is included in the personal data base and any additional notification is not required.





## SECTION 2 – DEFINITIONS

**2.1.** In this Privacy Policy the following terms have meanings as described in the Definition section below:

**2.1.1.** “Website” shall mean the website maintained at <https://raccoonline.com> ;

**2.1.2.** “Personally identifiable information” (hereinafter – “Personal Information” or “Personal Data”) shall mean any information that can be directly associated with a specific person and can be used to identify that person (including the information about your activities, such as information about your usage of the Website, when directly linked to personally identifiable information, including automatically collected). We do not consider Personal Data to include information that has been anonymized so that it does not identify a specific User.

**2.1.3.** “Controller” (data controller) means a legal person, which determines the purposes and means of the processing of personal data.

**2.1.4.** “Processor” means a natural or legal person, which processes personal data on behalf of the Controller.

**2.1.5.** “Website Owner” (“We”, “Us” or “Our”) means a legal person (entity) – RACCOON TECHNOLOGY LTD, which owns the exclusive rights for the objects of intellectual property – the Website. RACCOON TECHNOLOGY LTD is registered in compliance with the requirements of the Companies Act 2006 of the United Kingdom.

**2.1.5.1.** RACCOON TECHNOLOGY LTD is also a legal person, which determines the purposes and means of the processing of personal data and which processes personal data. Accordingly RACCOON TECHNOLOGY LTD is Controller and Processor in the meaning which is specified in paragraphs 2.1.3. and 2.1.4. of this Privacy Policy. However, there is the other person who processes personal data on behalf of Controller.

**2.2.** The other terms and notions used in this Privacy Policy shall be understood in accordance with THE RACCOONLINE PROJECT USER AGREEMENT.

## SECTION 3 – INFORMATION WE COLLECT AND PROCESS

**3.1.** The User hereby expressly consents to provide to Us, immediately upon Our notice of request, information (including Personal Data) that We, in Our sole discretion, deem to be required to maintain compliance with any law, regulation or policy.



This includes, but is not limited to, passports, government identification cards, driver's licences, utility bills, and other categories of documents for address proofing, your photo with clearly readable ID for proof.

**3.2.** The above mentioned documentation, described in paragraph 3.1., may be requested by the Website Owner prior to activating your account on the Website and/or any services available through the Website. Any doubts as to validity, authenticity and genuineness of the documents, provided by you shall be considered a valid reason to refuse you access to Our services and Website.

**3.3.** The User, You hereby expressly consent, represent and warrant that any and all information provided to Us is valid, current, complete and accurate.

**3.4.** We collect Personal Data from running the Website and use information, provided to Us by you, sent to Us by usage of your computer, mobile phone, or other access device, which may include Your ETH wallet address (public Ethereum address), IP address, audio and video feed, device information including, but not limited to, IMEI and serial device number, name and type of operating system, mobile network information and standard web log information, such as your browser type, and the pages you accessed on Our Website. When you use a location-enabled device with Our Website and products, we may collect geographical location data or use various means to determine the location, such as sensor data from your device that may, for instance, provide data on nearby cell towers and Wi-Fi access spots.

**3.5.** If you are Racconline project participant, in addition to the information noted in the paragraph 3.4., We may collect and store the following types of Personal Data: first name, email, date of birth.

**3.6.** We also collect and store such information as: User requests to support regarding the work of the Website and its related services and other issues as well as similar texts of User requests.

**3.7.** We reserve the right to request from You additional information to maintain compliance with any law, regulation or policy. We may also obtain information about You from third parties such as identity verification services and/or AML/KYC service providers.

**3.8.** When you access the Website We (or Google Analytics or similar service provider on our behalf) may place small data files called cookies on your computer or other device. We use these technologies (as well as other similar technologies) to recognize You as our User;





customise our Website and advertising; measure promotional effectiveness and collect information about your device or other access device, and also to mitigate the risk of device compromising, help prevent fraud, and promote trust and safety. You may control the use of cookies within your internet browsers' settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of our Websites and services may be impaired.

**3.9. YOU AGREE THAT YOUR PERSONAL DATA MAY BE PROCESSED AND STORED BY US AND/OR OUR COUNTERPARTIES DURING THE PERIOD OF TIME THAT IS PRACTICALLY NECESSARY TO FULFIL THE AIMS AND PURPOSES OF THE RACCOONLINE PROJECT.**

## SECTION 4 - HOW WE USE YOUR INFORMATION

We use the information we receive from you as follows:

**4.1.** We collect, process and store only the User's Personal Data that we need for their use of the Website and/or participation in the Raccoonline project. In particular, we use your Personal

Data to:

- administer Our Website and/or provide services related to the Raccoonline project;
- to organize and conduct Raccoonline project, including a possible token sale;
- to develop new products and services;
- to personalize Our Website for you;
- to send you technical notices, support and administrative messages;
- to communicate with you about products, services, promotions, events and other news and information we think will be of interest to you;
- to monitor and analyze trends, usage and activities in connection with the Website;
- to provide third parties with statistical information about Our Users;
- to detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Website Owner and others;
- to verify compliance with any terms and conditions governing the use of Our Website and/or the Raccoonline project infrastructure.





**4.2.** The Website Owner is a data Controller and Processor. Upon instructions from the Website Owner other persons can also act as a Processor. In particular, other persons may process your Personal Data on behalf of the Website Owner if there is an objective Website Owner's need to control/process or store information at the Website Owner's counterparties (such as AML/KYC service providers) or agents.

## SECTION 5 - PERSONAL DATA PROTECTION AND STORAGE

**5.1.** The Website Owner will do any and all efforts and actions prescribed by Applicable Law to store any of your Personal Data in secrecy by means of, including but not limited to firewalls and data encryption, physical access controls to Our data centers, and information access authorization controls (which are designed to comply with Applicable Law and regulations), authorization of access to Personal Data only for those employees or contractors who require it to fulfill their job or service responsibilities.

**5.2.** We store and process and may transfer your Personal Data to our servers in France, where our facilities or our service providers are located. It may also be processed by staff operating who work for Us or for one of Our service providers. Staff may be engaged in the fulfillment of Our services and/or the processing of your details and the provision of support services. By submitting your Personal Data, you agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Policy. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent than in your country. From time to time, the Personal Data may be also stored in other locations, and in such cases We will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

## SECTION 6 - THIRD PARTIES

**6.1.** We may share your personal information with:

- service providers under contract who help with our business operations;
- Our banking partners;
- companies that We plan to merge with or be acquired by (should such a combination occur, We will require that the newly combined entity follow these terms with respect to your Personal Data);
- third party identity verification services for fraud prevention purposes;



- law enforcement, government officials, or other third parties when We are compelled to do so by a subpoena, court order, or similar legal procedure; or We believe in good faith that the disclosure of Personal Data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of Our policies;
- Our Personal Data processing counterparties or agents, hired by or cooperating with Us, whose services are required by Us from the practical point of view;
- other third parties according to terms of this Privacy Policy.

## **SECTION 7 - INTEGRATING THIRD PARTY SERVICES AND LINKS**

**7.1.** Our Website and services may, from time to time, contain links to and from the websites of Our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own Privacy Policy and that We do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any Personal Data to these websites or use these services.

## **SECTION 8 – PROTECTING CHILD'S PRIVACY**

**8.1.** The Website and/or the Raccoonline blockchain are not designed for use by anyone under the age of 18 (and even over if the legislation of your jurisdiction provides acquiring the full dispositive legal capacity of a natural person over // If “over” – then does not make common sense. Meant to be “under” ?// the age of 18). As parent of a Child, you understand that you are legally liable for any transactions created by the Child. If you are a Child, you should withhold from using the Website and/or the Raccoonline blockchain.

## **SECTION 9 - RETAIN INFORMATION**

**9.1.** In accordance with applicable laws and as needed to provide services to our Users, we may hold your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain your Personal Data for as long as your account is active. Moreover, your Personal Data may be held beyond the above mentioned period till it is indispensable for Us to have relevant information to respond to any issues that may arise later.





In accordance with the existing legislative requirements, your Personal Data will not be stored by Us longer than the deadline which is determined by the goals and objectives (specified in SECTION 4 of this Privacy Policy) for achieving which we collect and process your Personal data.

## SECTION 10 - SECURITY

**10.1.** We use relevant electronic and procedural safeguards to protect the privacy of the information you provide to Us from loss and illegal disclosure.

**10.2.** PLEASE NOTE THAT TRANSMISSION OF DATA OR INFORMATION (INCLUDING COMMUNICATIONS BY EMAIL) OVER THE INTERNET OR OTHER PUBLICLY ACCESSIBLE NETWORKS IS NOT ONE HUNDRED PERCENT SECURE. PLEASE NOTE THAT WE ARE NOT LIABLE FOR THE SECURITY OF ANY DATA YOU ARE TRANSMITTING (WHICH MEANS IN THE PROCESS OF DATA TRANSFERRING) OVER THE INTERNET OR OVER THE OTHER METHOD WHICH IS BEYOND OUR CONTROL (IN PARTICULAR, NETWORKS THAT PROVIDES INTERNET ACCESS).

## SECTION 11 - PRIVACY POLICY UPDATES AND AMENDMENTS

**11.1.** We reserve the right to modify or amend this Privacy Policy at any time. You should review this Privacy Policy frequently. Your continued usage of the Website shall mean your acceptance of those amendments and updates.

## SECTION 12 – CONTACT US

**12.1. “How to remove all of your Personal Data?”**

You have the right to require correction of your Personal Data, updating, complete removal or removal of incorrect and/or inaccurate Personal Data by sending us an email to [support@raccoonline.com](mailto:support@raccoonline.com).

**12.2. “How to prohibit Personal Data processing if you allow this before? How to get all of your Personal Data collected by us?”**

If you want to prohibit Personal Data processing or get all of your Personal Data collected by us, you can send us required information via email [support@raccoonline.com](mailto:support@raccoonline.com).

**12.3.** If you have any questions concerning this Privacy Policy, please contact us via email [support@raccoonline.com](mailto:support@raccoonline.com).