

# PUMAPAY PRIVACY POLICY

Last updated: April 25, 2018

## OUR COMMITMENT TO YOU

Thank you for showing interest in our Services. In order for us to provide you with our service we are required to collect and process certain personal data about you and your activity.

By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of this information. We encourage you to review the following information carefully.

## GROUNDS FOR DATA COLLECTION

Processing of your personal information (meaning, any information which may potentially allow your identification with reasonable means; hereinafter "**Personal Information**") is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

When you use our services, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

## HOW DO WE RECEIVE INFORMATION ABOUT YOU?

We receive your Personal Information when you voluntarily provide us your personal details in order to create an account on our site (for example, your name and email address).

## WHAT TYPE OF INFORMATION WE COLLECT?

In order to provide you with our services we may collect the following Personal Information:

We record and collect data from or about your device (for example your computer or your mobile device) when you access our services and visit our site. This includes, but not limited to: Mobile ad IDs, Installation UUID, Android IDs and IP Address. This will facilitate our ability to improve our service and personalize your experience with us. This information cannot be used to identify you.

If we combine Personal Information with non-Personal Information about you, the combined information will be treated as Personal Information for as long as it remains combined.

## TRACKING TECHNOLOGIES

When you visit or access our services we use (and authorize 3<sup>rd</sup> parties to use) pixels, cookies, events and other technologies ("**Tracking Technologies**"). Those allow us to automatically

collect information about you, your device and your online behavior, in order to enhance your navigation in our services, improve our site's performance, perform analytics and customize your experience on it. In addition, we may merge information we have with information collected through said tracking technologies with information we may obtain from other sources and, as a result, such information may become Personal Information.

#### **HOW DO WE USE THE INFORMATION WE COLLECT?**

- Provision of Services – we will use the Personal Information you provide us for the provision and improvement of our services to you, such as to offer you financial products you might be interested in from our third party vendors.
- Marketing purposes – we may use your Personal Information (such as your email address or phone number). For example, by subscribing to our newsletter you will receive tips and announcements straight to your email account. We may also send you promotional material concerning our services or our partners' services (which we believe may interest you). You may choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the “unsubscribe” link in the emails that you receive from us. Please note that even if you unsubscribe from our marketing materials, we may continue to send you service-related updates and notifications, or reply to your queries and feedback you provide us.
- Analytics, surveys and research - we are always trying to improve our services and think of new and exciting features for our users. From time to time, we may conduct surveys or test features, and analyze the information we have to develop, evaluate and improve these features.
- Protecting our interests - we use your Personal Information when we believe it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect our rights and property, including our users and/or partners.
- Enforcing of policies - we use your Personal Information in order to enforce our policies, including but limited to our Terms and Conditions a.
- Compliance with legal and regulatory requirements - we also use your Personal Information to investigate violations and prevent money laundering and perform due-diligence checks, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.

#### **WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

- Companies in our group - we share your information with companies in our group, as well as our employees, in order to provide you with our services.
- Service providers - we share your information with business partners, such as storage providers and analytics providers who help us provide you with our service.
- Legal and regulatory entities - we may disclose any information in case we believe, in good faith, that such disclosure is necessary in order to enforce our Terms and Conditions, take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, protect the security or integrity of the site and our servers and protect our rights and property, including our its users and/or partners.
- Merger and acquisitions – we may share your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all

of our assets. Any party that acquires our assets as part of such a transaction may continue to use your information in accordance with the terms of this Privacy Policy.

## **TRANSFER OF PERSONAL INFORMATION OUTSIDE THE EEA**

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

## **HOW WE PROTECT YOUR PERSONAL INFORMATION**

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your personal information. Your information is stored on secure servers and isn't publicly available. We limit access of your information only to those employees or partners that need to know the information in order to enable the carrying out of the agreement between us.

You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account (for example, by signing off after you have finished accessing your account). You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use.

While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. You should be aware that there is always some risk involved in transmitting information over the internet. While we strive to protect your Personal Information, we cannot ensure or warrant the security and privacy of your personal Information or other content you transmit using the service, and you do so at your own risk.

Please note that we cannot control, nor will we be responsible for the Personal Information collected and processed by third parties, its safekeeping or a breach thereof, or any other act or omission pertaining to it, their compliance with the General Data Protection Regulation or any other law or regulation. We advise you to read the respective privacy policy of any such third party and use your best discretion.

## **RETENTION**

We will retain your Personal Information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client personal data, trading information, account opening documents, communications and anything else as required by applicable laws and regulations.

## **YOUR RIGHTS**

If you reside in the EU, you may request to:

- a. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information.
- b. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
- c. Request rectification of your personal information that is in our control.
- d. Request erasure of your personal information.
- e. Object to the processing of personal information by us.
- f. Request to restrict processing of your personal information by us.
- g. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

#### **UPDATES TO THIS POLICY**

This Privacy Policy is subject to changes from time to time, in our sole discretion. The most current version will always be posted on our website (as reflected in the "Last Updated" heading). You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our services after any revisions become effective, you agree to be bound by the updated Privacy Policy.

#### **HOW TO CONTACT US?**

If you wish to exercise any of the aforementioned rights, or receive more information, please contact using the details provided below:

[info@pumapay.io](mailto:info@pumapay.io)

Decentralized Vision Limited