

## **PRIVCY**

### **PRIVACY POLICY**

**Updated: October 16, 2018**

This Privacy Policy (the "Policy") describes how PRIVCY, Inc. and its related companies ("PRiVCY") collect, use and share personal information of consumer users of this website, <https://www.PRiVCY.io> (the "Site").

#### **IMPORTANT INFORMATION**

PRiVCY is committed to personal privacy. We do not need, or want, any information about the identities of the people using our products. Except for the very limited technical data collection mentioned below, which is essentially foundational to all websites, the only information that we receive about individuals is what is voluntarily provided to us in connection with inquiries, whether from people curious about PRiVCY or users of our product seeking support. It comes down to this:

**WE ONLY USE PERSONAL DATA TO PROVIDE REQUESTED SUPPORT OR RESPOND TO INQUIRIES. WE NEVER COLLECT PERSONAL DATA ABOUT INDIVIDUALS WITHOUT THEIR CONSENT.**

#### **WHAT WE COLLECT**

As noted above, we are not interested in learning anything more about our users and visitors than is absolutely necessary for us to provide information about our services, and support to users of those services. We get information about you, which may include information that allows us to identify an individual, natural person (such as an email address or phone number) (collectively, "Personal Data") in only the limited ways set forth below.

**Information You Give Us.** We collect only information you directly give us on our Site as via email or other correspondence (chat, phone) as required to provide customer support.

**Information Automatically Collected.** We automatically log information about you and your computer. For example, when visiting our Site, we log your computer operating system type, browser type, browser language, the website you visited before browsing to our Site, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Site. When performing an exchange, we log information such as the wallet addresses and the transaction IDs involved.

**Do Not Track Signals.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to do not track signals.

**Cookies.** We may log information using "cookies." Cookies are small data files stored on your hard drive by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site.

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer, which are used only by us to recognize your computer or mobile device when it revisits our Site; and (2) third party cookies, which are served by service providers on our Site and can be used by such service providers to recognize your computer or mobile device when it visits other websites.

**Cookies we use**

Our Site uses the following types of cookies for the purposes set out below:

Type of cookie	Purpose
Functionality Cookies	These cookies allow our Site to remember whether you have visited our Site before. The purpose of these cookies is to avoid you having to view the Privacy Policy notice every time you visit our Site.
Analytics and Performance Cookies	<p>These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered does not identify any individual visitor. The information is aggregated and anonymous. It includes the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information.</p> <p>We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.</p> <p>We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Site works. You can find out more information about Google Analytics cookies here:  <a href="https://developers.google.com/analytics/resources/concepts/gaConceptsCookies">https://developers.google.com/analytics/resources/concepts/gaConceptsCookies</a></p> <p>You can find out more about how Google protects your data here:  <a href="http://www.google.com/analytics/learn/privacy.html">http://www.google.com/analytics/learn/privacy.html</a></p> <p>You can prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available via this link:  <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a></p>

## Disabling cookies

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings.

## USE OF PERSONAL INFORMATION

We use your Personal Data only to respond to comments and questions and provide customer service.

## SHARING OF PERSONAL DATA

We may share Personal Data as follows:

- We may share Personal Data with your consent.
- We may share Personal Data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- We may share Personal Data for legal, protection, and safety purposes.
  - o We may share information to comply with laws.
  - o We may share information to respond to lawful requests and legal processes.
  - o We may share information to protect the rights and property of PRIVCY, our agents, customers, and others. This includes enforcing our agreements, policies, and terms of use.
  - o We may share information in an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.
- We may share information with those who need it to do work for us. We may also share aggregated and/or anonymized data with others for their own uses.

## ANONYMOUS DATA

When we use the term “anonymous data,” we are referring to data and information that does not permit you to be identified or identifiable, either alone or when combined with any other information available to a third party.

We may create anonymous data from the Personal Data we receive about you and other individuals who provide Personal Data to us. Anonymous data might include analytics information and information collected by us using cookies. We make Personal Data into anonymous data by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyze usage patterns in order to make improvements to our Site.

## **INTERNATIONAL DATA TRANSFER**

Your information, including Personal Data that you provide, may be transferred to, stored at and processed by us outside the country in which you reside, including, but not limited to the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By submitting Personal Data to us, you consent to such transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

## **SECURITY**

We use reasonable organizational, technical and administrative measures to protect Personal Data within our organization. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure please immediately notify us of the problem by contacting us using the details below.

## **RETENTION**

We will only retain your Personal Data as long reasonably required for us to provide the requested customer support and inquiry services. In the context of customer support, we retain information sufficient to connect subsequent requests from the same user in order to provide efficient service, unless a longer retention period is required or permitted by law (for example for regulatory purposes).

## **YOUR RIGHTS**

**Opt-out.** You may contact us anytime to opt-out of: (i) automated decision-making and/or profiling; (ii) any new processing of your Personal Data that we may carry out beyond the original purpose; or (iii) the transfer of your Personal Data outside the EEA. Please note that your use of some of the Site may be ineffective upon opt-out.

**Access.** You may access the information we hold about you at any time by contacting us directly as set forth below.

**Amend.** You can also contact us to update or correct any inaccuracies in your Personal Data.

**Move.** Your Personal Data is portable – i.e. you to have the flexibility to move your data to other service providers as you wish.

**Erase and forget.** In certain situations, for example when the information we hold about you is no longer relevant or is incorrect, you can request that we erase your data.

If you wish to exercise any of these rights, please contact us using the details below. In your request, please make clear: (i) **what** Personal Data is concerned; and (ii) **which of the above rights** you would like to enforce. For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request.

We

will try to comply with your request as soon as reasonably practicable and in any event, within one month of your request. Please note that we may need to retain certain information for recordkeeping purposes.

### **COMPLAINTS**

We are committed to resolve any complaints about our collection or use of your Personal Data. If you would like to make a complaint regarding this Policy or our practices in relation to your Personal Data, please contact us as set forth below. We will reply to your complaint as soon as we can and in any event, within 45 days. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve

the right to contact your local data protection supervisory authority.

### **CONTACT INFORMATION**

We welcome your comments or questions about this Privacy Policy.

You may contact us as follows:

PRiVCY

[support@privcy.io](mailto:support@privcy.io)

**CHANGES TO THIS PRIVACY POLICY.** We may change this Privacy Policy. If we make any changes, we will change the “Last Updated” date above.