

Privacy Policy

Last updated and effective immediately on March 27, 2020

Tracy is operated by Aicumen Technologies Inc. (“Aicumen”, “us” “our” and “we”), and we respect your privacy. This “Privacy Policy” summarizes what personal information we collect, and how we use and disclose this information when you use our website, software, or services (collectively, referred to as “Tracy” or “Services”).

This Privacy Policy applies to all users of our Services. These Services include, without limitation, our website, Tracy app (the “Website”), Tracy (our interface for interacting with the Interplanetary File System (“IPFS”)) based services including but not limited to MoiBit(www.moibit.io), and our storage solution powered by Tracy. By using our Services, or by creating an account on through our Services, you signify your consent to the terms of our Privacy Policy. If you do not agree with any terms of this Privacy Policy, please do not use our Services or submit any personal information to us. We reserve the right to modify this Privacy Policy at any time. We will reflect any such modifications to this Privacy Policy on our Services. Your continued use of the Services after any such changes constitutes your acceptance of this Privacy Policy, as revised.

What Personal Information We Collect

“Personal Information” is information about an identifiable individual. We collect Personal Information when you voluntarily provide it through our Services, or when you provide it to us through other means. For example, we may collect Personal Information when you:

- contact us through email;
- create an account on the Services;
- use the Services, including the Website;
- upload content to Tracy;
- communicate with Aicumen;

The Personal Information we collect will depend on the service you request. The Personal Information we collect might include:

- your email address;
- your IP address;
- your computer’s operating system;
- your web browser user agent;
- the data you upload, to the extent that such data contains Personal Information;
- the content hash associated with data you upload, to the extent that such data contains Personal Information;
- the keys you generate or retrieve using the Services;
- and any other Personal Information that you choose to submit to us.

See also the section titled “**How Aicumen Collections Information Through Technological Means**” for additional information about the types of Personal Information we may collect.

If you purchase Credits on the Website, or subscribe for a paid tier of the Services, the information we collect may include the following:

- information provided by third party payment processors such as PayPal, Dash and Stripe;
- your Bitcoin, Ethereum, or any other public or private blockchain wallet addresses; and
- your banking or payment information as requested throughout Services;
- your contact details and residential information as requested throughout Services;

When you upload data using the Services, we may collect information related to such uploaded data, such as your account information or your IP address. We do this to make the Services better for you (for example, so that it is easier for you to keep track of your data and share your data with concerned third parties), to verify compliance with our Terms and Conditions of Use, to comply with legal requests, and to carry out and assist with any investigations.

How Aicumen Collects Information Through Technological Means

When you use our Services, we may collect information that is automatically sent to us by your web browser, such as your numerical IP address. We may also collect other information, such as the type of browser you use, version of the computer’s operating system, which pages you view, and the files you request. The home page www.gettracy.app uses google analytics, and how a user arrived at our website by off-site links. Please refer to the instructions provided by your browser or device if you want to learn more about what information it sends to Services you use, or how you may change or restrict this. Using software that we developed in-house, we track certain metrics such as daily active users, number of registered users, and number of user types (free, paid, etc.).

None of this tracking information examines Personal Information. We use this information to improve our understanding of how users use our Services, to improve our Services, and attract more users. We may also use the information collected for our own research and development purposes.

We use remarketing services to advertise on third party websites to you after you visited our Website. We and our service providers may use tracking technologies, including, tracking pixels. Tracking pixels are embedded in a websites HTML code that load when you visit a website. They allow us to track behaviour and to better tailor our services to visitors of our Website and other interested parties. The tracking pixels on our website may allow us to collect the following types of information:

- IP address
- Your location

- Your language;
- Your interests and internet habits;
- Your past searches on search engines;
- Your age;
- Your computer device or mobile device;
- Your browser type;
- Your online spending habits;
- Your relationship status;
- Your work status;
- Your affinity interests;
- Your sex;
- Your education;

Please be aware that if you disable or remove these technologies some parts of our website will not work and that when you revisit our website your ability to limit cookies is subject to your browser settings and limitations.

Google Analytics

We use Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Website available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>.

How Aicumen Uses and Discloses Personal Information

The information we collect from you may be used by us for the purposes for which it was collected, as provided in this Privacy Policy, or for other purposes that are disclosed to you and to which you consent. In addition to as otherwise described in this Privacy Policy, we may use and disclose information collected from you as follows:

- to deliver our Services to you;
- to register your account on the Services;
- to verify and authenticate your account information;
- to send you informational, or administrative communications;
- to transmit data uploaded to Tracy to our local nodes, or third-party nodes, for storage for the specified number of months or for an indefinite period;

- to share your data with persons who have the hash of the corresponding file and who download that file through the Services;
- to share data with other users through your selected gateway (either IPFS Gateway or any other Gateways administered by Aicumen, its affiliates or its subsidiaries);
- to verify compliance with our Terms of Use;
- to conduct investigations;
- to respond to inquiries and provide you with customer support;
- to increase the security and safety of our Services and users;
- to perform analytics on our Services;
- for any other purposes that are disclosed to you and to which you consent; and
- for any purpose required by law.

Our Services.

We also combine, analyze, process, and store certain information we collect from you for the purposes of facilitating and improving our Services. We will NOT transfer information we collect from you to trusted third party service providers (“Trusted Third-Parties”) to assist us with carrying out any of these purposes. These Trusted Third-Parties will only be provided with your Personal Information to the extent necessary to perform services on our behalf in compliance with this Privacy Policy and only in accordance with our instructions. At all times, we will remain responsible for the Trusted Third-Parties access and use of your Personal Information.

Our Services may facilitate certain features enabling you to share your Personal Identifiable Information (“PII”) along with law and enforcement agencies under the applicable rule of law. These features shall share your PII to the concerned authorities by default. If this violates the local law, please do not use the Services.

We work with payment services providers to collect payments from users of our Services. As a result, we will share your Personal Information and other payment information with third party payment service providers, to the extent necessary to make such payment collections.

Additional Third-Party Services.

From time to time, we may partner with various third-partners to provide you with additional services, such as additional storage space on third-party servers or nodes (“Third-Party Services”). If you choose to use a Third-Party Service, then you agree that we may disclose your Personal Information as necessary to facilitate your use of such Third-Party Service. Any such Personal Information will be subject to the privacy policies of such Third-Party Services provider.

Other Jurisdictions.

Information collected may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions.

We also may transfer your Personal Information to our parent corporation, Aicumen Technologies Ltd. (the “Parent”), as necessary to enable and assist our Parent with improvement and development of our Services. We may also transfer your Personal Information to our Parent if we amalgamate or merge with our Parent. Our Parent’s use of your Personal Information will be subject to this Privacy Policy.

We also may use or disclose your Personal Information for any other purpose permitted by law or to which you consent.

Legal Process and Public Interest.

We may disclose your Personal Information to third parties if we believe that such disclosure is necessary to: (i) comply with applicable laws, regulations, legal process, appropriate government request, or court orders; (ii) to assist in a criminal or civil investigation; (iii) to enforce or verify compliance with Tracy’s Terms and Conditions of Use; (iv) to prevent crime; (v) to protect any person from bodily injury or death; (vi) to protect the safety of Aicumen, our directors, officers, or employees, or the safety of our users; or (vii) to perform a task carried out in the public interest.

Discoverability on the IPFS

The Services allow you to upload data (including PII) to IPFS-based networks such as, but not limited to, Moibit(<https://www.moibit.io/>). If you upload data to our public IPFS-based network, it will be discoverable by any person that knows the corresponding content hash or searches for it. If you upload data to a private IPFS-based network, it will be discoverable only by persons who are authorized to access the private network and who know the content hash.

You are responsible for understanding the extent to which the data you upload to the IPFS-based networks using the Services is accessible by other persons, and you understand that failure to do so may result in your Personal Information being accessible by the public or at least certain members of the public.

How We Protect Personal Information

The security of your Personal Information is important to us. We protect your Personal Information by maintaining administrative, physical, and technological safeguards appropriate to the sensitivity of such Personal Information. Personal Information may only be accessed by persons within our organization who require such access to provide you with the services indicated above.

We retain Personal Information that we collect only as long as necessary for the purposes for which it was collected or to meet legal requirements. We may destroy Personal Information when it is no longer needed.

Third Party Collection of Information

This Privacy Policy does not apply to applications, services, technologies, or websites that are owned by and/or operated by other parties. The relevant third party’s terms of use, privacy

policy, permissions, notices and choices should be reviewed by yourself regarding their collection, use, storage, and sharing practices since they may be different from ours.

Access and Rectification

You have a right to access to your Personal Information and to request a correction to it if you believe it is inaccurate. If you have submitted Personal Information and would like to have access to it, or if you would like to have it corrected, please contact us using the contact information provided below under the “How to Contact Us” section.

However, if your Personal Information has been uploaded to third-party nodes or is otherwise stored on third- party servers, we will be unable to assist you with rectifying such Personal Information as it will no longer be under our control.

Withdrawal of Consent

By contacting our Privacy Officer in writing at info@aicumen.com and following the instructions given by our Privacy Officer, you may withdraw consent to the collection, use, or disclosure of your information, subject to our legal or contractual obligations, reasonable notice, reasonable processing times, and technological restrictions. We may be unable to render Services effective immediately to the maximum extent possible under the provisions of law, in case of withdrawal of your consent.

How to Contact Us

If you have any questions regarding this Privacy Policy, or to access your information, please contact our Privacy Officer at info@aicumen.com.