

# Privacy Policy

This privacy policy ("Policy") describes how NeoLogin ("NeoLogin" "Company", "we", "our", "us") collects, uses, shares, and stores personal information of users of this website, [www.neologin.io](https://www.neologin.io) (the "Site") and users of the NeoLogin, a non-custodial wallet which is accessed through a login service, which can be used to gain access to multiple decentralized applications (the "Services").

By signing up to use the Services, you accept the terms of this Policy and our Terms of Use, and consent to our collection, use, disclosure, and retention of your information as described in this Policy.

First of all, we will **never personally ask you to share your password or private keys outside of the standardized login or password recovery process!** When logging in, always make sure you are on a secured connection, login in via [www.neologin.io](https://www.neologin.io). Never trust an insecure connection or another website that asks you for your NeoLogin details or private key. We are not responsible if you do share your password with anyone else. See our Terms of Use for more information

## What Personal Information do we process?

The (categories of) personal data we may, now, or in the future, process are:

- Your email address
- Your phone number
- Information we collect automatically about how you use our Site and/or Services ("Product Usage Data"), including information on the device(s) you may use ("Device Information") and information on when, where and how you use our Site and/or Services, including your IP address and info such as your browser type ("Log Data"). For a more specific overview of what information is collected automatically, see the section on 'cookies' below.

## What do we use your personal information for?

We process your **email address** for three main purposes:

- For us to be able to offer you the Services, as it is required to provide the log-in Services;
- to be able to contact you and/or send you information regarding crucial security-related circumstances, updates or procedures; and
- to inform you about the Services or other services developed by us which may interest you. Every such email will contain an option to unsubscribe.

We may process your **phone number** to be able to provide SMS-based two-factor authentication (2FA) services. In other words, we store it to increase the security of your account and your wallet. If you use 2FA in order to log into your NeoLogin account, an attacker would need access to your phone or telecommunications network to hack you.

We may process **Product Usage Data, Device Data and Log Data** in order for us to:

- perform user analytics in order to keep track of usage and better understand our user,
- to carry out research and development to improve our Site and Services,

- identify IT or network issues,
- identify mal-intended usage of our Site and/or Services,
- to manage our Websites and system administration and security, and
- to customize the content and layout of the Websites.

### **What are the legal bases for the processing of your personal information under the European GDPR?**

The processing of your email address is required for us to provide you with the Services. Hence, the legal basis to collect your email address is to perform a contract, if the provision of free Services by providing an open-access software solution qualifies as a contract in your jurisdiction. The processing of your email address, phone number, Product Usage Data, Device Data and Log Data for the other usage purposes described above, is further and/or otherwise based on our legitimate interests. These interests include improving, maintain, providing and enhancing our Site and Services, our marketing interests, and most importantly, it also includes our interest in ensuring the security of the Services and our Site. The processing hereof is no way overridden by your data-protection interests, fundamental rights and/or freedoms.

### **Do we share personal information with third parties?**

We generally do not share or sell the personal information that you provide to us with other organizations. However, Google Analytics Data (Product Usage Data, Device Data and Log Data) might be stored on Google Analytics' servers. All other data is stored on Amazon Web Services. The serving of files to clients to provide access to the Site and Servers is executed by Github. We may also transfer information about email addresses to other third-party service providers, in order to, for example, use CRM services.

Information about your public key address might be used to gain access to third-party applications, insofar as you use our Services to connect to such third-party applications. The usage of third-party services is in no way connected to the usage of our Services, and the privacy policies of such third-party (decentralized) applications apply. Transactional information you might create by sending transactions or signing messages using your NeoLogin account is furthermore executed by, and administered to, Neo, a public and permissionless blockchain, in order to execute your transactions. Such information is publicly available and auditable in the blockchain in order to ensure the security and safety of the Neo network (and thus your transactions). We do not function as a data controller or data processor in this context, as we do not define the purposes for which and the means by which personal data is processed, and have no influence over the processing of such data in any way shape or form whatsoever.

### **How is your personal information retained and secured?**

We employ industry-standard security measures designed to protect the security of all information submitted through the Services. Passwords are encrypted using the aes-256-ctr encryption standard. However, the security of information transmitted through the internet can never be fully guaranteed. Information gathered for the purposes of Google Analytics as described in this privacy policy, is stored by Google Analytics, which has earned the independent security standard ISO 27001 certification. Any information processed on, or through, Amazon Web Services and Github are similarly secure by way of compliance with applicable industry-standard ISO certifications and practices.

We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data. Users of the Services are responsible for maintaining the security of any password or another form of authentication involved in obtaining access to password protected. In order to protect you and your data, we may suspend your use of any of the Services, without notice,

pending an investigation, if any breach of security is suspected. For more information, see our Terms of Use.

### **What are my rights relating to my data?**

Under the European General Data Protection Regulation, you have certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

- **Opt-out.** Stop sending you direct marketing communications which you have previously consented to receive. We may continue to send you important Service-related and other non-marketing communications.
- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You can submit these requests by email to [help@neologin.io](mailto:help@neologin.io). We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us at [help@neologin.io](mailto:help@neologin.io) or submit a complaint to the data protection regulator in your jurisdiction.

### **Cross-Border Data Transfer**

Please be aware that your personal data might be transferred to, processed, and stored in the United States or other non-EEA jurisdictions. Whenever we transfer your personal information out of the EEA to the U.S. or countries not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be based on a data transfer mechanism recognized by the European Commission as providing adequate protection for personal information.

## Cookie policy

For the processing of Product Usage Data, Device Data and Log Data, and the use thereof as described above, we may use cookies. Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a particular client or website and can potentially be accessed by us, as well as your personal computer.

Cookies could allow us to collect data automatically (some of which might be considered personal information. Cookies are either “session” cookies which are deleted when you end your browser session, or “persistent” cookies, which remain until their deletion by you (discussed below) or the party who served the cookie. Some Cookies are necessary for certain uses of the Site, and without such Cookies, we would not be able to provide you with functional access to the Site and/or Service. These ‘Functional Cookies’ could, for example, enable us to remember your previous actions within the same browsing session and secure our Sites. They could also allow us to, for instance, deliver a page tailored to a particular user, based on the device you are using and the location you are in.

Aside from this functional purpose, we mainly use cookies for the analytical purposes described in the section on ‘How we use your personal information above’. These ‘Analytical Cookies’, which allow us to use Google Analytics, may process and store information such as a user’s Internet Protocol (IP) address, internet service provider, device and browser type, browser version and settings, language preference, cache preferences, operating system, platform, device identifier, device type and manufacturer, location information, demographics, the pages or features of our Site and/or Service to which a user browsed and the time spent on those pages or features, the frequency with which the Site and/or Service is used by a user, search terms, the links on our Site that a user clicked on or used, timestamps and other statistics.

We also use Google Analytics to help us offer you an optimized user experience. You can find more information about Google Analytics’ use of your personal data here:

<https://policies.google.com/privacy?hl=en&gl=us>.

### How to disable Cookies.

Most internet browsers are initially set up to automatically accept cookies. If you do not want our websites to store cookies on your device, you can change your browser settings so that you receive a warning before certain cookies are stored. You can also adjust your settings so that your browser refuses most of our cookies or only certain cookies from third parties. You can also withdraw your consent to cookies by deleting the cookies that have already been stored.

If you disable the cookies that we use, this may impact your experience while on the Unilever website, for example, you may not be able to visit certain areas of a website or you may not receive personalized information when you visit a website.

If you use different devices to view and access the Site and/or Services (e.g., your computer, smartphone, tablet) you will need to ensure that each browser on each device is adjusted to suit your cookie preferences.

The procedures for changing your settings and cookies differ from browser to browser. If necessary, use the help function on your browser or click on one of the links below to go directly to the user manual for your browser.

- [Internet Explorer](#)

- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Safari](#)
- [Opera](#)

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Contact info**

email address: [help@neologin.io](mailto:help@neologin.io)