

Cryptonomic Privacy Policy

Last Updated: July 11, 2018

Welcome, and thank you for your interest in Cryptonomic, Inc. ("**Cryptonomic**", "**we**," or "**us**") and our Service (as defined in the Cryptonomic [Terms of Service](#)).

This Privacy Policy ("**Policy**") describes the information that we gather from you on the Service, how we use and disclose such information, and the steps we take to protect such information. By using the Service, you consent to the privacy practices described in this Policy.

This Policy is incorporated into and is subject to the Cryptonomic Terms of Service. Capitalized terms used but not defined in this Policy have the meaning given to them in the Cryptonomic Terms of Service.

The information we collect on the Service:

- **User-provided Personal Data.** When you use the Service, you may provide and we may collect what is generally called personally identifiable information, or personal information, which is information that specifically identifies an individual. For the purposes of this Policy, we refer to such information as "**Personal Information**." Examples of Personal Information include name and email address. Personal Information also includes other information, such as IP address, geographic area, or preferences, when any such information is linked to information that identifies a specific individual. You may provide us with Personal Information in various ways on the Service. For example, you provide us with Personal Information if you decide to opt out of our arbitration provision in the Terms of Service, use the Service, or send us customer service-related emails.
- **Automatically Collected Information.** When you use the Service, we may automatically record certain information from your device by using various types of technology, including "clear gifs" or "web beacons." This automatically collected information may include your IP address or other device address or ID, web browser and/or device type, the web pages or sites that you visit just before or just after you use the Service, the pages or other content you view or otherwise interact with on the Service, and the dates and times that you visit, access, or use the Service.

How we use the information we collect. We use information we collect on the Service in a variety of ways in providing the Service and operating our business, including the following:

- We use the information that we collect on the Service to operate, maintain, enhance and provide all features of the Service, to provide services and information that you request, to respond to comments and questions and otherwise to provide support to users in connection with the Service.

- Public Information such as public keys, addresses and cryptographic signatures are used to execute operations such as origination, transaction and delegation with the Tezos blockchain technology. We may temporarily preserve Public Information in our logs in order to diagnose and fix errors. Successful operations can lead to Public Information being published on a public blockchain, which we may maintain a copy of in our databases.
- We will be monitoring the number and type of operations invoked by users of our Wallet in aggregate in order to ensure the Service is available and performing properly, to improve the Service, and to develop new products, services, feature, and functionality.
- We may use automatically collected information to monitor and analyze the effectiveness of Service, monitor aggregate site usage metrics such as total number of visitors and pages viewed, and to identify any security threats to the Service.
- We may use your email address or other information we collect on the Service to contact you for administrative purposes such as customer service.

When we disclose information. Except as described in this Policy, we will not disclose information that we collect to third parties without your consent. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

- We may make reports of aggregated, or otherwise non-Personal Information, available to the Tezos community to describe the performance of the Wallet or to other third parties for various purposes such as (i) for business or marketing purposes; or (ii) to assist such parties in understanding our users' interests, habits, and usage patterns.
- Any information that you voluntarily choose to include in a publicly accessible area of the Service, will be available to anyone who has access to that content, including other users. Successful operations with the Tezos blockchain technology can lead to Public Information being published on a public blockchain, thereby making it accessible through websites ("block explorers"), software clients and wallets.
- We work with third party service providers to provide website, application development, hosting, maintenance, and other services for us. These third parties may have access to or process your information as part of providing those services for us. Generally, we limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and we require them to agree to maintain the confidentiality of such information.
- We may disclose your information if required to do so by law or in the good-faith belief that such action is necessary to comply with state and federal laws, in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.
- We also reserve the right to disclose your information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available, or (v) protect our property or other

legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others.

- Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

Your Choices

You may, of course, decline to use the Service, or choose not to share certain Personal Information with us. If you wish to access or amend any Personal Information we hold about you, you may contact us at support@cryptonomic.tech. **Please note, information published on the public blockchain cannot be modified or deleted.** This information is publicly visible through websites ("block explorers") and software clients or wallets.

We may retain information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

Third-Party Services

The Service may contain features or links to web sites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Service. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

Children's Privacy

Protecting the privacy of young children is especially important. Our web site is a general audience site not directed to children under the age of 13, and we do not knowingly collect Personal Information from children under the age of 13 without obtaining parental consent. If you are under 13 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Information has been collected on the Service from persons under 13 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 13 years of age has submitted information to us in connection with the Service, then you may alert us at support@cryptonomic.tech and request that we delete that child's Personal Information from our systems.

Data Security

We use certain physical, managerial, and technical safeguards that are designed to improve the integrity and security of Personal Information that we collect and maintain. We cannot, however, ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk.

We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

If we learn of a security systems breach that may impact you, then we may attempt to notify you electronically so that you can take appropriate protective steps. We may post a notice through the Service or on Twitter, Reddit, Github or similar third party platforms if a security breach occurs.

Privacy Settings

Although we may allow you to adjust your privacy settings to limit access to certain Personal Information, please be aware that no security measures are perfect or impenetrable. We are not responsible for circumvention of any privacy settings or security measures on the Service. Additionally, we cannot control the actions of other users with whom you may choose to share your information. Further, even after information posted on the Service is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on the Service. We cannot and do not guarantee that information you post on or transmit to the Service will not be viewed by unauthorized persons.

International Visitors

The Service is hosted in the United States and is intended for visitors located within the United States. If you choose to use the Service from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your Personal Information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Service. By providing any information, including Personal Information, on or to the Service, you consent to such transfer, storage, and processing.

Changes and Updates to this Policy

Please revisit this document periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify this Policy, we will make it available through the Service, and indicate the date of the latest revision. In the event that the modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when you access the Service for the first time after such material changes are made. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of this Policy.

Your California Privacy Rights

Under California Civil Code Section 1798.83, California customers are entitled to request information relating to whether a business has disclosed Personal Information to any third parties for the third parties' direct marketing purposes. As explained elsewhere in this Policy, Cryptonomic will not sell or transfer your Personal Information with third party companies for their direct marketing purposes without your consent. California customers who wish to request further information about our compliance with

this statute or who have questions more generally about our Policy and our privacy commitments to our customers and website users should not hesitate to contact us at the address below.

Our Contact Information

Please contact us with any questions or comments about this Policy, your Personal Information, our use and disclosure practices, or your consent choices by email at support@cryptonomic.tech.

Cryptonomic, Inc.

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