

KYOKAN GROUP

Bob Wallet Privacy Policy

Effective Date: December 3rd, 2019

We at Kyokan know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy.

By using or accessing the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

Remember that your use of Kyokan's Services is at all times subject to our Terms of Service, which incorporates this Privacy Policy. Any terms we use in this Privacy Policy without defining them have the definitions given to them in our Terms of Service.

What does this Privacy Policy cover?

This Privacy Policy covers our treatment of personally identifiable information ("***Personal Information***") that we gather when you are accessing or using our Services, but not to the practices of companies we don't own or control, or people that we don't manage. We may gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including to personalize, provide, and improve our services, to fulfill your requests for certain products and services, and to analyze how you use the Services. In certain cases, we may also share some Personal Information with third parties, but only as described below.

To use the Wallet and interact with the Handshake network, you are not required to submit Personal Information. However, certain of our other Services may require that you submit Personal Information, and you may elect to submit to us Personal Information in connection with your use of the Wallet. The terms of this Privacy Policy will apply to any submission of Personal Information by you.

If you are under the age of majority in your jurisdiction of residence, you may use the Services only with the consent of or under the supervision of your parent or legal guardian. Consistent with the requirements of the Children's Online Privacy Protection Act (COPPA), if we learn that we have received any information directly from a child under age 13 without first receiving his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use our Services and subsequently we will delete that information.

Will Kyokan ever change this Privacy Policy?

We're constantly trying to improve our Services and how we approach privacy matters, so we may need to change this Privacy Policy from time to time, but we will alert you to changes by requiring you to log in to our Services again and accept the new Privacy Policy and/or by some other means. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used.

What Information does Kyokan Collect?

Information You Provide to Us: We receive and store any information you knowingly provide to us. For example, this includes information you provide when you elect to provide usage statistics or crash reports in connection with your use of the Wallet, such as information regarding your transaction history on the Handshake network or how you otherwise use the Wallet or the Services. This also includes contact information you elect to provide to us, such as your email address, as well as information you provide to us when you provide us with feedback and correspondence, such as information you provide in your responses to surveys, when you participate in market research activities, report a problem with Service, or receive technical support.

You should also understand that, because of the nature of blockchain networks like Handshake, your entire transaction history will be publicly accessible and viewable whenever you transact from your Wallet. If you provide us or any other third party with Personal Information linking your Wallet to your Personal Information, this transactional history may be permanently associated with your Personal Information.

Information Collected from Other Sources: We may obtain information from other sources, such as third-party information providers, or through mergers and acquisitions, and combine this with information previously collected. In these cases, our Privacy Policy governs the handling of the combined personal information.

Information Collected Automatically: When you interact with certain of our Services, we may automatically receive and record information on our server logs from your browser or device, which may include your IP address, geolocation data, device identification, the type of browser and/or device you're using to access our Services, and the page or feature you requested. We typically collect this information through a variety of tracking technologies, including cookies, embedded scripts, web beacons, file information and similar technology (collectively, "**tracking technologies**"). For example, we collect information about your device and its software, such as your IP address, browser type, Internet service provider, platform type, a unique ID that allows us to uniquely identify your browser or mobile, and other such information. We also collect information about the way you use our Site, for example, the site from which you came and the site to which you are going when you leave our website, the pages you visit, the links you click, whether you open emails or click the links contained in emails, whether you access the Site from multiple devices, and other actions you take on the Site. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Site and to understand more about the demographics of our users. If you click on a link to a third-party website or service, such third party may also transmit cookies or other tracking technologies to you. This Privacy Policy does not cover the use of tracking technologies by any third parties, and we aren't responsible for their privacy policies and practices. Please be aware that tracking technologies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honor "Do Not Track" requests you have set using your browser or device.

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. When you turn on the Do Not Track function in your browser, we stop collecting the information from your browser that allows us to tailor advertisements and other content specifically to you that is based on your visits to our advertising partners' websites. Specifically, we stop collecting information from the unique browser cookie that links your browser to visits to third party sites. Do Not Track signals are set on a browser-by-browser basis, so you must set them on every browser you use if you do not wish to be

tracked. Remember that this is just our Do Not Track policy, and we can't and don't make any promises about how third parties react when you set this signal on your browser.

We use or may use the data collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the Site; (b) provide custom, personalized content and information; (c) provide and monitor the effectiveness of our Services; (d) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our Site; (e) diagnose or fix technology problems; and (f) otherwise to plan for and enhance our Services.

If you would prefer not to accept cookies or other tracking technologies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie or other tracking technologies, which lets you choose whether or not to accept it; (ii) disable existing cookies or tracking technologies such as web beacons; or (iii) set your browser to automatically reject cookies and certain tracking technologies. Please note that doing so may negatively impact your experience using the Site, as some features and services on our Site may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain tracking technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it. Deleting cookies does not delete Local Storage Objects (LSOs).

Information we will never collect: We will never ask you to share your private keys, seed phrase, password, or other login credentials to your Wallet or other security information that could be used to access your Wallet without your explicit consent and action. Never trust anyone or any site that asks you to enter your private keys or similar security information.

How does Kyokan Use the Personal Information it Receives?

As mentioned above, we use information we collect to improve the Services, optimize our technology, refine the experience of our users, and innovate ways to forward our mission.

Namely, we use the information we collect to:

- Administer the Services, enable you to use its features, and improve your overall user experience;
- To send information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
- To respond to comments and questions and provide customer service;
- Analyze how users use the Services to help us understand usage patterns, optimize the Services, and know if there are problems with the Services;
- To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity;
- With your consent, to link or combine user information with other Personal Information;
- To provide and deliver products and services requested by customers; and
- As disclosed below under the section of this Privacy Policy entitled "Will Kyokan Share Any of the Personal Information it Receives?"

Will Kyokan Share Any of the Personal Information it Receives?

We do not share or sell the personal information that you provide us with other organizations without your express consent, except as described in this Privacy Policy. We may share your Personal Information with third parties as described below:

- **Our Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you or to us. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.
- **Our Affiliates:** We may disclose your personal information to our subsidiaries and corporate affiliates for purposes consistent with this Privacy Policy.
- **Business Transfers:** We may choose to buy or sell assets and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.
- **Third Party Services:** We may use third party services, such as Google Analytics, to grow our business, to improve and develop our Services, to monitor and analyze use of our Services, to aid our technical administration, to increase the functionality and user-friendliness of our Services, and to verify that users have the authorization needed for us to process their requests. Any use of such third-party services will be on an opt-in basis. These services may collect and retain some information about you, such as the IP address assigned to you on the date you use the Services, but not your name or other personally identifying information. We may combine the information generated through the use of these services with your Personal Information but never in a way that will identify you to any other user. Although these services may plant a persistent cookie on your web browser to identify you as a unique user the next time you use the Services, the cookie cannot be used by anyone but Google or such other third-party service provider. These services' ability to use and share information about your use of the Services is restricted by the Google Analytics Terms of Service and the Google Privacy Policy. You may find additional information about Google Analytics at <https://google.com/policies/privacy/partners/>. You can opt out of Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout/>.
- **Compliance with Laws and Safety:** We may share Personal Information if we believe it is necessary to comply with a legitimate law or court order; enforce or apply our Terms of Service and other agreements; or protect the rights, property, or safety of Kyokan, our employees, our users, or others.

We may also use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

Is Personal Information about me secure?

We endeavor to protect the privacy of the Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. The safety and security of your Personal Information also depends on you. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. Your Wallet is protected by your password and/or seed phrase, and we urge you to take steps to keep this and other Personal Information safe by not disclosing your security credentials or leaving your Wallet open in an unsecured manner. We further protect your Personal Information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology. We also seek to protect Personal Information by refraining from collecting Personal Information where possible. However, these measures do not guarantee that your Personal Information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. By using the Services, you acknowledge that you understand and agree to assume these risks.

AS DESCRIBED IN OUR TERMS OF SERVICE, WE DO NOT AND WILL NEVER STORE YOUR WALLET PASSWORD OR SEED PHRASE TO YOUR WALLET. IF YOU LOSE ACCESS TO BOTH YOUR PASSWORD AND SEED PHRASE, WE WILL BE UNABLE TO HELP YOU ACCESS YOUR WALLET, AND ANY ASSETS HELD IN THE WALLET MAY BE PERMANENTLY IRRETRIEVABLE.

EU Residents

If you are a resident of the European Economic Area (“**EEA**”) or Switzerland, you may have additional rights under the General Data Protection Regulation (the “**GDPR**”) and other applicable law with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “**Personal Data**” generally means information that can be used to individually identify a person, and “**processing**” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Kyokan will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at operations@kyokan.io.

What Personal Data Do We Collect from You?

We collect Personal Data about you when you provide such information directly to us, when third parties such as our service providers provide us with Personal Data about you, or when Personal Data about you is automatically collected in connection with your use of certain of our Services such as the Site.

- **Information we collect directly from you or third parties:** We receive Personal Data directly from you when you provide us with such Personal Data, including without limitation, Personal Information as described above under “Information You Provide to Us” and “Information Collected from Other Sources”, and any other information you may elect to submit in your communications with us while using our Services. You are not required to submit Personal Data solely in connection with your use of the Wallet, but certain of our other Services may require submission of Personal Data to fully exploit our Services.
- **Information we automatically collect when you use our Services:** Some Personal Data is automatically collected when you use our Services, including without limitation, the information described above under “Information Collected Automatically”. We may also use web beacons and other tracking technologies.

How Do We Use Your Personal Data?

As described in this Privacy Policy, we process Personal Data to operate, improve, understand and personalize our Services. See “How does Kyokan Use the Personal Information it Receives?” for more information on how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

- **Contractual Necessity:** We process certain Personal Data as a matter of “contractual necessity”, meaning that we need to process the data to perform under our Terms of Service with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
- **Legitimate Interest:** We may also process your Personal Data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. We consider and balance any potential impacts on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by any adverse impact on you (unless we have your consent or are otherwise required or permitted to by law). Examples of these legitimate interests include, operation and improvement of our business, products and Services, provision of customer support, protection from fraud or security threats, compliance with legal obligations or completion of corporate transactions.
- **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

How and With Whom Do We Share Your Data?

We share Personal Data with our agents, third party service providers who work on our behalf and provide us with services related to the purposes described in this Privacy Policy or our Terms of Service, potential business partners in connection with business transfers described in this Privacy Policy, or for legal purposes. Please see “Will Kyokan Share Any of the Personal Information it Receives?” for more information.

How Long Do We Retain Your Personal Data?

We retain Personal Data about you for as long as necessary to provide you Services. In some cases, we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. Afterwards, we may retain some information in a depersonalized or aggregated form but not in a way that would identify you personally.

What Rights Do You Have Regarding Your Personal Data?

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email operations@kyokan.io. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also

need to you to provide us with additional information, which may include Personal Data, if necessary, to verify your identity and the nature of your request.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.
- **Rectification:** If you believe that any Personal Data, we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
- **Erase:** You can request that we erase some or all your Personal Data from our systems, *provided* that this will not erase any Personal Data you have submitted on the Handshake blockchain or any other blockchain network that isn't controlled by us.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about Kyokan's practices with respect to your Personal Data with the supervisory authority of your country or European Union Member State.

Transfers of Personal Data

Certain of the Services are hosted and operated in part in the United States ("**U.S.**") through Kyokan and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services and providing your information, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, may be provided to Kyokan in the U.S. and may be hosted on U.S. servers. You hereby consent to and authorize Kyokan to transfer, store and process your information to and in the U.S., and possibly other countries. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Policy. One such step we may take to ensure the security of your Personal Information in the event that a transfer may not be subject to the same protection in the EEA, or Switzerland, is to enter into specific contract clauses approved by the European Commission which ensure your personal information is given the same protection it has in Europe.

What If You Have Questions Regarding Your Personal Data?

If you have any questions about this section or our data practices generally, please contact us using the following information:

- **Designated Representative Name:** Percy Chan
- **Email address for contact:** operations@kyokan.io

California Residents

If you are a California resident, California law may provide you with additional rights regarding our use of your Personal Information. To learn more about your California privacy rights, visit our California Consumer Privacy Act Notice for California Residents located here:
https://github.com/kyokan/agreements/blob/main/Kyokan_CCPA_Latest_10282020.pdf.

What if I have questions about this policy?

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to operations@kyokan.io, and we will try to resolve your concerns.