

RISKPools PRIVACY POLICY

Effective date: March 11, 2024

1. General

The purpose of our online RiskPools service is to provide you (also referred to hereinafter as “User” or “customer”) with a trusted and safe solution to sign and certify documents, with the help of blockchain technology (hereinafter “RiskPools Services”) in a lawful and secure way. To achieve such a solution, we collect certain information or data about you when you use RiskPools Services.

RiskPools (also referred to hereinafter as “we,” “us,” and “our”) will always seek to respect and protect your privacy. This Privacy Policy was created in order to advise Users on how we collect, process, store, and/or use their information.

RiskPools may, in its sole discretion, amend the Privacy Policy at any time.

2. Information RiskPools Collects

Non-Personal Data. When you use RiskPools for familiarization purposes only, we collect:

- Your IP address, and details of which version of web browser you used;
 - Information on how you use the site, using cookies and page tagging techniques.
- This information helps us to improve RiskPools.

We consider this information to be non-personal data (i.e., data not relating to an identified or identifiable person; Or data which does not identify Users personally.

Personal data. When you use RiskPools Services to sign and certify documents using blockchain technology, we may collect:

- Your name;
- Your E-mail;
- Other data, which is necessary for making valid legal transactions (depending on the RiskPools Services, which you use).

This information allows users to make safe and legally binding transactions on RiskPools.

Payment Information. When Users pay for the RiskPools Services, we collect certain payment information, such as credit card, billing address and/or other financial account information. We consider this information to be a type of User’s personal data.

Subscribing to Newsletters. When you subscribe to our newsletters, we will process your E-mail address to verify your subscription and provide you with information on RiskPools Services’s changes, surveys, upcoming special offers / events, and/or educational content we believe may be of interest. You can cancel your subscription at any time by following the ‘unsubscribe’ link located on our distributed newsletter E-mails.

Information Automatically Collected from Users & Use of Third Party Tools. When Users interact with RiskPools Services, RiskPools and RiskPools's third party service providers - including analytics and third party content providers - may automatically collect certain information from Users including, but not limited to: (i) The browser and operating system Users are utilizing; (ii) the Internet Protocol ("IP") address or other unique device identifiers ("Device Identifiers") for any device (computer, mobile phone, etc.) used to access RiskPools; (iii) The URL or advertisement that referred Users to RiskPools and/or information regarding the physical location of the device used to access the RiskPools Software; (iv) Information on how Users use the RiskPools Services (cookies, page tagging and/or other techniques). We use certain technologies to collect and compile information regarding visitor behavior and visitor demographics, including, but not limited to: Yandex Metrics, Google Analytics, User ID feature, Google Tag Manager, Google AdWords, Facebook Analytics. The privacy practices of these tools are subject to their own privacy policies. We, therefore, encourage all users to read Google's policy regarding its analytics services at: <http://www.google.com/analytics/learn/privacy.html>. You can opt out of Google's collection and processing of data generated by your use of the Website by going to <http://tools.google.com/dlpage/gaoptout>. Facebook's privacy policy can be found at: <https://www.facebook.com/policy.php#sharing-partner-information>.

Combination of Personal and Non-Personal Data. Certain non-personal data would be considered a part of User's personal data if it were combined with other User identifiers in a way that enables Users to be identified (for example, combining User's IP address information with User's name). However, the same pieces of information are considered non-personal data when they are taken alone or combined only with other non-personal data (for example, User's IP address and User's viewing preferences). Silent Notary may combine User's personal data with non-personal data, but will treat such combined information as User's personal data.

3. Information RiskPools Does Not Collect

We do not collect personal data revealing:

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Data concerning health or sex.

RiskPools does not knowingly collect personal data from anyone younger than age 18. RiskPools online services are intended for legal entities, self-employed entrepreneurs, or individuals above the age of 18. If you are the parent or legal guardian of a person younger than age 18 and believe that RiskPools has collected personal data from such a person, please contact us at: support_coin@riskpools.io. We will use commercially reasonable efforts to delete such information from our files.

4. How RiskPools Uses Your Data

We may use your information:

- To send you information regarding your account;
- To take steps at the request of the data subject prior to entering into a contract via RiskPools;

- To uphold your compliance with the terms of use and other legal obligations you are subject to and agreed to be bound by. Furthermore, to take appropriate measures in cases of non-compliance with them;
- For validation, suppression, content improvement, service improvement, and feedback.

5. How RiskPools Secures Your Data

We protect your information once we receive it in accordance with our procedures and security features. Your payment transactions are always encrypted. We maintain appropriate safeguards and current security standards to minimize the risks of unauthorized access, disclosure, and/or misuse of Your data / information.

6. How RiskPools May Share Your Data with Others

We may disclose and/or use your provided information if we have a legal obligation to do so, and/or if we have to enforce or apply our terms of use and other agreements you are subject to and that you agreed to be bound by. This includes, but is not limited to, exchanging information with banks and government departments for legal reasons.

7. What are Your rights in Relation to the Use of Your Information / Data

Rights to Access, Update, Correct and Request Deletion. RiskPools takes reasonable steps to ensure that the data we collect is accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating or deleting your Personal Information via email: support_coin@riskpools.io. Such requests will be processed in line with local laws. We may ask you to provide us with certain credentials to verify your identity before granting access to, or making any changes to Your Data.

8. What are Your EU Data Subject Rights

In operating the Website, we process Your data as a controller (as such terms are defined in the GDPR). As a controller, we are committed to fulfill data subjects' ('Users') GDPR rights. As an EU resident, you have the right of access (Art 15 GDPR), the right to rectification (Art 16 GDPR), the right to erasure of your personal data (Art 17 GDPR), the right to restriction of processing of your personal data (Art 18 GDPR) as well as the right to data portability (Art 20 GDPR). Furthermore, you have the option to file a complaint against the processing of your personal data with the competent supervisory authority. As an EU resident, you may contact Us at any time at: support_coin@riskpools.io and request access, rectification, erasure and/or restriction of the personal information that we store. We may ask you to provide us with certain credentials in order to verify your identity before granting access to and/or making any changes to your information / data.

9. RiskPools Opt-Out Policy

Users may change the types of communications they want to receive from RiskPools through their online account. Users may also opt-out of receiving marketing E-mails from RiskPools by following the opt-out instructions provided within those E-mails. Users who access RiskPools Software by using certain desktop browsers or mobile applications, may, with permission, receive push notifications. Please note that we reserve the right to send you certain communications relating to your account or use of the RiskPools Software (for example, administrative and service announcements) via E-mail and other means, and these

transactional account messages may be unaffected if you opt-out from receiving marketing communications.

10. User Privacy Notice

This Privacy Policy only applies to RiskPools Services, and doesn't cover other websites and services that we link to. If you go to another website (from this one), you may be subject to the privacy policy on that website, and as such, you should read it to find out what it does with your information / data. When you provide RiskPools with the information / data of another person, you must obtain that person's consent to both the disclosure and the processing of that information in accordance with this Privacy Policy. You will always be told when the information above is being collected, and it will only be used for the purpose you provide it for. This Privacy Policy may change from time to time. If there are any material changes to this Policy, We will notify you by E-mail or as otherwise required by applicable law. If we need to adapt the policy to legal requirements, the new policy will become effective immediately, or as required. Your continued use of this Website (RiskPools Services) after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates. Also, please contact us about any privacy concerns at support_coin@riskpools.io.