

# Versa Privacy Policy

Last Updated: August 2, 2023

At Versa, we know you care about how your personal information is used and shared, and we take your privacy seriously. This Privacy Policy describes how your personal or behavioral data is collected, used, and stored when you access our website, the web or mobile application (collectively the "Site").

We may modify this Privacy Policy from time to time which will be indicated by changing the date at the top of this page. If we make any material changes, we will notify you by email (sent to the email address specified in your account), by means of a notice on our Services prior to the change becoming effective, or as otherwise required by law. Your use of the Site is at all times subject to the Versa User Agreement, which incorporates this Privacy Policy. Any terms we use in this Privacy Policy without defining them have the definitions given to them in the Versa User Agreement.

## 1. ACCEPTANCE OF THE PRIVACY POLICY

By the Site, you signify acceptance of the terms of this Privacy Policy. Where we require your consent to process your information, we will ask for your consent to the collection and use of your information as described further below.

We provide additional "just-in-time" disclosures or information about the data processing practices of specific services. These notices may supplement or clarify our privacy practices or may provide you with additional choices about how we process your data. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of the Site.

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 the Site and subsequently we will delete that information.

## 2. WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy sets forth our policy for collecting or using personal or behavioral data in connection with users access and using of the Site.

## 3. THE INFORMATION WE COLLECT

- **Versa does not track IP addresses.** Where third parties collect this information by default, we take a three-step approach: 1) request manual removal of IP tracking, 2) prevent this data from being sent to our product analytics services, and 3) give users the choice to opt-out of analytics entirely.
- **Versa does not share user data with third parties, ever.**
- **We do not collect Personally Identifiable Information.** You are not required to provide any PII to use the basic features of the Site. You should understand that because of the nature of the Ethereum network, your entire transactional history conducted from your Wallet is provided to us or otherwise publicly accessible by default and is necessary to support your usage of the Services.
- **We do not automatically collect Personal Information or other nonpublic information in connection with transactions you conduct using our Services, and we do not use any automatic tracking technologies in these parts of our Services unless you explicitly agree to the use of these tracking technologies.**
- **Do Not Track Policy:** Some Internet browsers - like Internet Explorer, Chrome Firefox, and Safari - include the ability to transmit "Do Not Track" or "DNT" signals. Since uniform standards for "DNT" signals have not been adopted, we do not currently process or respond to "DNT" signals.
- **Information we will never collect:** We will never ask you to share your private keys 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.

## 4. STORAGE FOR OUR MOBILE APPLICATION

For our mobile users, push notifications are slightly different because we rely on Apple and Google's push notification systems. In order to send notifications to a given wallet, we need to persistently store device tokens (an anonymized string) and the list of wallet addresses subscribed to notifications from that device. Anyone who wishes to avoid this data being stored entirely has the choice to disable push notifications on the Settings screen.

## 5. USE USAGE DATA

As a general policy, we aim to protect your privacy and personal information by collecting, using or sharing as little personal information as possible. We do not collect such information even for "better UX" or the usual argument the collection of such information improves your experience.

## **6. SHARING OF THE PERSONAL INFORMATION**

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.

## **7. HOW WE PROTECT AND STORE INFORMATION**

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, private key, 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 a breach of such firewalls and secure server software. By using our Services, you acknowledge that you understand and agree to assume these risks.

WE DO NOT AND WILL NEVER STORE YOUR WALLET PASSWORD, PRIVATE KEY, 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.

We may 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.

## **8. INTERNATIONAL TRANSFERS**

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. Versa 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 [service@versawallet.io](mailto:service@versawallet.io).

## 9. 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 business partners or service providers provide us with Personal Data about you, or when Personal Data about you is automatically collected in connection with your use of our Services.

- **Information we collect directly from you:** 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 your Wallet through our Services, but certain of our other Services may require submission of Personal Data to fully exploit those 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.”

## 10. YOUR RIGHTS 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 [service@versawallet.io](mailto:service@versawallet.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 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. You can also access certain of your Personal Data by visiting the Versa Interface or the VersaApp.
- **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. You can correct some of this information directly by editing them on the Versa Interface or the Versa App.
- **Erasure:** 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 to the Ethereum network.
- **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 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 Versa's practices with respect to your Personal Data with the supervisory authority of your country or European Union Member State.

## 11. 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 Entity Name: Versa LLC.
- Physical Address: Euro House, Richmond Hill Road, Kingstown, St Vincent and the Grenadines
- Email address for contact: [service@versawallet.io](mailto:service@versawallet.io)