

# Privacy Statement

Effective as of **9 October 2018**

Finclusion Labs, Inc., doing business as WeTrust, (“**Finclusion**”, “**we**”, **us**”, “**our**”) is committed to protecting your privacy. We have prepared this Privacy Statement to describe to you our practices regarding the personal data we collect from users of our website (the “**Site**”) and our online services, including the WeTrust’s platform and applications (the “**Services**”).

## 1. Scope

This Privacy Statement explains:

1. What information we collect and why we collect it
2. How we use that information and when we disclose it to others
3. Your rights regarding that information, including how to access and update your information
4. The steps we take to protect your information

This Privacy Statement applies to information that we obtain through the Site and Services. This Statement does not apply to personal data relating to Finclusion’s employment-related activities.

## 2. Types of Data We Collect

We collect personal data from users, as described below.

### (a) Information You Provide to Us.

- We may collect personal data from you, such as your first and last name, e-mail, wallet address, username and password when you create an account to log in to our Services (“Account”).
- We may collect payment information necessary to complete transactions, including your name, email address, wallet address, credit card information, and billing information, as well as any transaction data, including any recipients or senders of funds.
- If you provide us feedback via social media or contact us via e-mail, we will collect your username, name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

- If you have created an Account and enter any information or descriptions, invitations to other participants, savings goals, or other transaction data that is generated through the use of our Services, we will collect those data in order to provide you the Services you request.
- If you sign up for our newsletter we will collect your email address.
- If you participated in any token purchase or bounty transaction directly with Finclusion, we may collect your name, e-mail address, wallet address, and/or IP address.
- We may also collect personal data at other points in our Services that state that personal data is being collected.

**(b) Information Collected via Technology.**

- Log Files. As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Services, track users’ movements around the Site, gather demographic information about our user base as a whole, and better tailor our Services to our users’ needs.
- Cookies. Like many online services, we use cookies to collect information. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the Site. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Services. This type of information is collected to make the Services more useful to you and to tailor the experience with us to meet your special interests and needs.
- Traffic Analytics. We use a number of third party service providers, such as Google Analytics, to help analyze how users use the Services (“Analytics Companies”). These Analytics Companies uses Cookies to collect information such as how often users visit the Services, what features they use on our Site, and what other sites they used prior to coming to the Site. We use the information we get from these Analytics Companies to improve our Site and Services. These Analytics Companies collect the IP address assigned to you on the date you visit the Services, rather than your name or other personally identifying information. We do not combine the information generated through the use of our Analytics Companies with your personal data. Although these Analytics Companies may place a persistent Cookie on your web browser or

mobile device to identify you as a unique user the next time you visit the Services, the Cookie cannot be used by anyone but the Analytics Company that placed the applicable Cookie. This Policy does not apply to and we are not responsible for the Cookies used by these Analytics Companies.

### **3. Use of Your Personal Data**

We use the personal data we collect, as described above:

- To facilitate the creation of and secure your Account on our network, identify you as a user in our system, provide the Services, process transactions and respond to your requests. For users located within the EU, this use is necessary to perform the contract with you.
- As necessary for certain legitimate business interests, which include the following:
  - improve the quality of experience when you interact with our Site and Services;
  - send you a welcome e-mail to verify ownership of the e-mail address provided when your Account was created;
  - send you administrative e-mail notifications, such as security or support and maintenance advisories;
  - respond to your inquiries related to employment opportunities or other requests;
  - monitor and analyze use of the Services, for the Service's technical administration, to increase our Service's functionality and user-friendliness, and to verify users have the authorization needed for the Service to process their requests. As of the date this policy went into effect, we use Google Analytics (please see the "Cookies" section below);

- To conduct analytics to inform our marketing strategy and enable us to enhance and personalize our communications and the experience we offer to our users.
- To provide communications by post which we think will be of interest to you.
- If you ask us to delete your data or to be removed from our marketing lists and we are required to fulfil your request, to keep basic data to identify you and prevent further unwanted processing.
- **Marketing.** We may use your personal data to contact you in the future to tell you about services we believe will be of interest to you. Where required by law, we will only send you marketing communications if you consent to us doing so at the time you provide us with your personal data. You may opt out of receiving such emails by following the instructions contained in each promotional email we send you or by updating your user settings. In addition, if at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below. We will continue to contact you via email regarding the provision of our Services and to respond to your requests.

If we ever intend to use any of your personal data in any manner that is not consistent with this Privacy Statement, we will tell you of our intended use prior to, or at the time at which, we collect such information.

For information on your rights under the applicable European Union (“EU”) law, please see the “European Union (EU) Users” section below.

#### **4. Disclosure of Your Personal data**

We disclose your personal data as described below and as described elsewhere in this Privacy Statement.

**(a) Third Party Service Providers.** We use other companies, agents or contractors ("Service Providers") to perform services on our behalf or to assist us with providing services to you. For example, we may engage Service Providers to process credit card transactions or other payment methods. Or, we may engage Service Providers to provide services such as marketing, advertising, communications, infrastructure and IT services, to provide customer service, and to analyze and enhance data (including data about users' interactions with our service). These third parties may have access to your information only for purposes of performing these tasks on our behalf and under obligations similar to those in this Privacy Statement. We require our Service Providers to agree to take reasonable steps to keep the personal data that we provide to them secure. We do not authorize them to use or disclose your personal data except in connection with providing their services.

**(b) Spring Charities.** In connection with your use of the WeTrust Spring product, we may make your information available to Charities registered with the Spring product, as described in the Spring Terms of Service.

**(c) Corporate Restructuring.** We may share some or all of your personal data in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or any portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, personal data may also be transferred as a business asset. If another company acquires our company, business, or any of our assets, that company will possess the personal data collected by us and will assume the rights and obligations regarding your personal data as described in this Privacy Statement.

**(d) Other Disclosures.** Regardless of any choices you make regarding your personal data (as described below), Company may disclose personal data if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on

Company; (c) to protect or defend the rights or property of Company or users of the Site or Services; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Statement, or our Terms of Use.

## **5. Update Your Personal Data**

You may change any of your personal data in your Account by editing your settings within your Account or by sending an email to us at the address listed above. You may request deletion of your personal data by us, and we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives or backups. We may also retain your information for fraud prevention or similar purposes.

## **6. European Union (EU) Users**

**Scope.** This section provides information on your rights under EU law (for these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway).

**Data Controller.** Finclusion is a data controller under the EU General Data Protection Regulation (the “**GDPR**”). To find out our contact details, please see the “Contact Us” section below, [which also provides the contact details of our representative in the EU for purposes of the General Data Protection Regulation.]

**Your Rights.** Subject to EU law, you have the following rights in relation to your personal data:

- **Right of access:** If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data along with certain other details. If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your personal data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. If we shared your personal data with others, we will tell them about the correction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.
- **Right to erasure:** You may ask us to erase your personal data in some circumstances, such as where we no longer need it or you withdraw your consent (where applicable). If we shared your data with others, we will alert them to the need for erasure where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.
- **Right to restrict processing:** You may ask us to restrict or 'block' the processing of your personal data in certain circumstances, such as where you contest the accuracy of the data or object to us processing it (please read below for information on your right to object). We will tell you before we lift any restriction on processing. If we shared your personal data with others, we will tell them about the restriction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.

**Right to data portability:** You have the right to obtain your personal data from us that you consented to give us or that was provided to us as necessary in connection with our contract with you where we process that personal data in an automated way. We

will give you your personal data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.

- **Right to object:** You may ask us at any time to stop processing your personal data, and we will do so:
  - If we are relying on a legitimate interest (described under the “How We Use Data” section above) to process your personal data -- unless we demonstrate compelling legitimate grounds for the processing; or
  - If we are processing your personal data for direct marketing.
- **Rights in relation to automated decision-making and profiling:** You have the right to be free from decisions based solely on automated processing of your personal data, including profiling, unless this is necessary in relation to a contract between you and us or you provide your explicit consent to this use.
- **Right to withdraw consent:** If we rely on your consent to process your personal data, you have the right to withdraw that consent at any time, but this will not affect any processing of your data that has already taken place.
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we handled your personal data, you can report it to the data protection authority that is authorized to hear those concerns.

You may contact us to exercise your rights.

**Legitimate Interest.** “Legitimate interests” means our interests in conducting our business, managing and delivering the best Services to you. This Privacy Statement describes when we process your personal data for our legitimate interests, what these interests are and your rights. We will not use your personal data for activities where the impact on you overrides our interests, unless we have your consent or those activities are otherwise required or permitted by law.



## **7. Data Transfers**

Finclusion is a US-based company that offers our Services to domestic and international customers. As a result, information that we collect, including personal data, may be transferred to our U.S. offices to permit us to comply with our legal and contractual obligations, to provide information and services to prospective and current customers, and to perform related business activities. In addition, we may provide information to third-party service providers in the U.S. and in other countries to the extent necessary to support Finclusion's business activities, and we may access personal data collected by our customers to support the Services that we provide to our customers. As a result, personal data may be transferred to and stored on servers located in the United States and in countries different from the country in which that information was initially collected. Similarly, information we collect may be accessed by Finclusion and our third-party service providers and business partners from countries other than the ones in which the information is stored.

## **8. Cookies**

The Site uses cookies to operate and administer our Site and the Services, make it easier for you to use the Services during future visits and gather usage data on our Site.

**(a) What Are Cookies.** A "cookie" is a piece of information sent to your browser by a website you visit. By choosing to use our the Site after having been notified of our use of cookies in the ways described in this Privacy Statement, and, in applicable jurisdictions, through notice and unambiguous acknowledgement of your consent, you agree to such use.

Some cookies expire after a certain amount of time, or upon logging out (session cookies), others remain on your computer or terminal device for a longer period (persistent cookies). Our Site uses first party cookies (cookies set directly by us) as well

as third party cookies, as described below. For more details on cookies please visit All About Cookies.

**(b) Type of Cookies Used.** The Site uses the following technologies:

- **Strictly Necessary Cookies:** Used to provide the Services available through our Site and to use some of their features, such as the ability to log-in and access to secure areas. These cookies are served by us and are essential for using and navigating the Site. Without these cookies, basic functions of our Site would not work. Because these cookies are strictly necessary to deliver the Site and the Services, you cannot refuse them.
- **Analytics/Performance:** Used to better understand the behavior of the users on our Site and improve our Site accordingly, for example by making sure Users are finding what they need easily. The Site uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). The information collected by Google (including your IP address) will be transmitted to and stored by Google on servers in the United States (Google is certified to the Privacy Shield for data transfers). How long a Google Analytics cookie remains on your computer or device depends on what it is and what it is used for. Some Google Analytics cookies expire at the end of your browser session, whilst others can remain for up to two years. For more information on Google Analytics privacy practices, read [here](#).

### **(c) Your Choices**

**Service Provider Opt Out.** You can opt-out directly from some advertising service providers and providers of tracking tools by using their opt-out tools. Some of these service providers, and links to their opt-out tools, are:

You can prevent your data from being collected by Google Analytics on our Site by downloading and installing the [Google Analytics Opt-out Browser Add-on](#) for your current web browser.

**Industry Opt Out Tools.** Some advertising service providers or providers of tracking tools may participate in the Network Advertising Initiative's (NAI) Opt-Out Tool (<http://www.networkadvertising.org/choices/>) and/or the Digital Advertising Alliance (DAA) Consumer Choice Page (<http://www.aboutads.info/choices/>), and you can opt-out of certain services and learn more about your choices by visiting the links included there. Users in the EU can visit <http://www.youronlinechoices.eu/> for more information about your choices and to opt out of participating service providers.

**Web Browser Controls.** You can prevent the use of certain tracking tools, such as cookies, on a device-by-device basis using the controls in your web browser. These controls can be found in the Tools > Internet Options (or similar) menu for your browser, or as otherwise directed by your browser's support feature. Through your web browser, you may be able to:

- Delete existing tracking tools
- Disable future tracking tools
- Set your browser to provide you with a warning each time a cookie or certain other tracking tools are being set

**Mobile Opt Out.** Your mobile devices may offer settings that enable you to make choices about the collection, use, or transfer of mobile app information for Behavioral Advertising. You may also opt-out of certain tracking tools on mobile devices by installing the DAA's AppChoice app on your mobile device (for iTunes, visit <https://itunes.apple.com/us/app/appchoices/id894822870?mt=8>, for Android, visit <https://play.google.com/store/apps/details?id=com.DAA.appchoices&hl=en>). For more information, please visit <http://support.apple.com/kb/HT4228>, <https://support.google.com/ads/answer/2662922?hl=en> or <http://www.applicationprivacy.org/expressing-your-behavioral-advertising-choices-on-a-mobile-device>, as applicable.

**Do Not Track Signals.** Some web browsers may transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is no standard that governs what, if anything, websites should do when they receive

these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise our policy on responding to these signals.

## **9. Data Retention**

We will keep your personal data for as long as reasonably necessary for the purposes described in this Privacy Statement, while we have a legitimate business need to do so in connection with your account, or as required by law (e.g. for tax, legal, accounting or other purposes), whichever is the longer.

## **10. Publicly Posted Information**

This Privacy Statement shall not apply to any information you post to the public areas of the Services. This includes, but is not limited to comments on our blog or public forums. Comments posted to public areas may be viewed, accessed, and used by third parties subject to those parties' privacy practices and policies.

## **11. Links To Other Sites**

This Privacy Statement applies only to the Services. The Site may contain links to other websites not operated or controlled by us ("**Third Party Sites**"). The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of such Third Party Sites and not by this Privacy Statement. By providing these links from the Service to these Third Party Sites, we do not imply that we endorse or have reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

## **12. Security**

We take reasonable steps to protect your personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or email transmission is ever fully secure or error free. In particular, email sent to or from the Service may not be secure. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing your personal data to us via the Internet.

### **13. A Note About Children**

We do not intentionally gather personal data from visitors who are under the age of 16. If a child under 16 submits personal data to Finclusion and we learn that the personal data is the information of a child under 16, we will attempt to delete the information as soon as possible. If you believe that we might have any personal data from a child under 16, please contact us at: [support@wetrust.io](mailto:support@wetrust.io).

### **14. Changes to This Privacy Statement**

This Privacy Statement is subject to occasional revision, and if we make any material changes in the way we use your personal data, we will notify you by sending you an e-mail to the last e-mail address you provided to us and/or by prominently posting notice of the changes on our Sites. Any changes to this Privacy Statement will be effective upon the earlier of thirty (30) calendar days following our dispatch of an e-mail notice to you or thirty (30) calendar days following our posting of notice of the changes on our Site. These changes will be effective immediately for new users of our Services. Please note that at all times you are responsible for updating your personal data to provide us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice. If you do not wish to permit changes in our use of your personal data, you must notify us prior to the effective date of the changes that you wish to deactivate your Account with us. Continued use of our Sites or Services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

### **15. Questions; Contacting Company; Reporting Violations**

If you have any questions or concerns or complaints about our Privacy Statement or our data collection or processing practices, or if you want to report any security violations to us, please contact us at the following address or email:

Finclusion Labs, Inc.

278 Hope Street, Suite C

Mountain View, CA 94041

[support@wetrust.io](mailto:support@wetrust.io)