

# Privacy Statement

Effective as of 25 May 2018

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

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 information relating to Finclusion’s employment-related activities.

Finclusion is a US-based company that offers our Services to domestic and international customers. As a result, information that we collect, including personal information, 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 information collected by our customers to support the Services that we

provide to our customers. As a result, personal information 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.

**Types of Data We Collect.** We collect personal information from users, as described below.

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

- We may collect personal information 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.
- 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 information at other points in our Services that state that personal information 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 use 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 information. 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.

## **Use of Your Personal information**

**(a) General Use.** In general, personal information you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your personal information in the following ways:

- facilitate the creation of and secure your Account on our network
- identify you as a user in our system
- provide improved administration of our Services

- provide the Services you request
- 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
- send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes of Company
- better understand your needs and interests
- personalize and improve your experience

**(b) Analytics.** We also collect some information (ourselves or using third party services) using logging and cookies, such as IP address, which can sometimes be correlated with personal information. We use this information for the above purposes and to monitor and analyze use of the Service, 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.

**Disclosure of Your Personal information.** We disclose your personal information 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 information that we provide to them secure. We do not authorize them to use or disclose your personal information except in connection with providing their services

**(b) Corporate Restructuring.** We may share some or all of your personal information 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 information 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 information collected by us and will assume the rights and obligations regarding your personal information as described in this Privacy Statement.

**(c) Other Disclosures.** Regardless of any choices you make regarding your personal information (as described below), Company may disclose personal information 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.

**Your Choices Regarding Your Information.** You have several choices regarding use of information on our Services:

**(a) Email Communications.** We will periodically send you free newsletters and e-mails that may promote the use of our Services. When you receive promotional communications from us, you may indicate a preference to stop receiving further promotional communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by

contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Statement.

**(b) Changing or Deleting Your Personal Information.** You may change any of your personal information 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 information 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.

**(c) 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:

The Google Analytics service is provided by Google Inc. You can opt-out from Google Analytics service from using your information by installing the Google Analytics Opt-out Browser tool: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout). For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: [www.google.com/policies/privacy](https://www.google.com/policies/privacy).

**(d) 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.

**(e) 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

**(f) 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.

**(g) 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.

**Information for EU-Based Individuals: Inclusion as Data Controller**

In general, Finclusion is a data controller under the EU General Data Protection Regulation (the “GDPR”). If you have any questions about our role, please contact [support@wetrust.io](mailto:support@wetrust.io). Finclusion does not specifically market or sell into the EU.

**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 information, we may 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 any dispatch of an e-mail notice to you or thirty (30) calendar days following any 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 information 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 any 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 information, 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.

**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:



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**A Note About Children.** We do not intentionally gather personal information from visitors who are under the age of 16. If a child under 16 submits personal information to the Company and we learn that the personal information 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 information from a child under 16, please contact us at: [support@wetrust.io](mailto:support@wetrust.io).