

# ALOE CAPITAL PRIVACY POLICY

**Last modified:** February 10, 2022

## **1. Introduction.**

Aloe Labs, Inc. (the “**Company**,” “**we**,” “**our**,” or “**us**”) takes protecting your privacy very seriously. This policy (this “**Privacy Policy**” or this “**Policy**”) describes the types of information we may collect from you or that you may provide when you visit our website located at <https://aloe.capital> (the “**Website**”), and our practices for collecting, using, maintaining, and disclosing that information. This document supplements our [Terms of Use](#), which is hereby incorporated for reference.

**This Privacy Policy applies to information we collect:**

- On this Website;
- When you communicate with us; and
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Policy.

**It does not apply to information collected by:**

- Us offline or through any other means, including on any other website operated by the Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content that may link to or be accessible from or on the Website.

Please read this Privacy Policy carefully to understand how we interact with your personal information (as defined below) and what we do with it. By using the Website and providing us with your information, you agree to this Privacy Policy. This Policy may change from time to time, and by continuing to use the Website, you agree to those changes. We encourage you to check this Privacy Policy periodically for updates.

## **2. Children Under the Age of 18.**

Our Website is not intended for children under eighteen (18) years of age. No one under age 18 may provide any information to us, including on the Website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, email address, or any blockchain identity or records related to you. If we learn we have collected or received personal information (as defined below) from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at [legal@aloe labs.us](mailto:legal@aloe labs.us).

## **3. The Kinds of Personal Information We Collect.**

**Information You Provide to Us:** The information we collect on or through our Website may include:

- Information by which you may be personally identified, such as name and email address, telephone number, online usernames or account identifiers, or other identifiers by which you may be contacted online or offline (“**personal information**”), which may be collected during your correspondence with us; and
- Your public key address or other public identifier related to your blockchain account or activity.

**Information Collected Automatically:** When using our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Information about your internet connection, including (without limitation) your IP Address;
- Information about the equipment, software, and configurations you use to access our website;
- Usage details, including the total time you spend on our website, the time you spend on each page and in what order those pages were visited and the internal links clicked, the general geographic location from which you access our Website, which browser and operating system you are using to visit our Website, and the referring website; and
- Performance details, including monitor page load times, CPU/memory usage, browser crashes and React component rendering.

The information we collect automatically is only statistical data and does not, itself, include personal information, though it may be correlated with other personal information (for example, in relation to your publicly viewable blockchain activities. See the Section entitled **Privacy & The Blockchain** below for more information). Nonetheless, we do not perform such associations to build unique user profiles and only use this information to help us improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Provide our services;
- Estimate our audience size and usage patterns;
- Store information about your preferences, allowing us to customize our Website according to your individual interests;
- Speed up your searches; or
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Web Beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened

an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

#### **4. How We Use Your Information & Why We Collect It.**

We may use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you;
- To provide you with information, products, or services that you request from us;
- To fulfill any other purpose for which you provide it;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- To notify you about changes to our Website or any products or services we offer or provide through it;
- To allow you to participate in interactive features on our Website;
- To help facilitate the ongoing development of our services;
- In any other way we may describe when you provide the information; or
- For any other purpose with your consent.

#### **5. Disclosure of Your Information.**

We may disclose aggregated information, and information that does not directly identify any individual about our users without restriction. We may disclose personal information that you provide to us as described in this Privacy Policy:

- To our subsidiaries and affiliates;
- To contractors, service providers, and other third parties we use to support our Website and services;
- To fulfill the purpose for which you provide it;
- For any other purpose disclosed by us when you provide the information; or
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- To enforce or apply our [Terms of Use](#) and other agreements, including for payment and purchase purposes; or
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection, credit risk reduction, or identifying malicious actors using our products, or related blockchain communities generally.

We do not sell your personal information to third parties for monetary compensation.

## **6. Privacy & the Blockchain**

A key feature of many blockchain technologies, including any blockchain on which our services rely, is the transparency and public accessibility of on-chain transactions. This includes but is in no way limited to your public sending address (“**public key**”) and any other information that you choose to include. Additionally, information stored on-chain may be public, immutable, and not easily removed or deleted and, in many cases, cannot be deleted. Your public keys may reveal information about you and this information can potentially be correlated now or in the future by any party who chooses to do so, including law enforcement. If you are unfamiliar with blockchain technology and its transparent and public nature, we strongly encourage you to conduct your own research into blockchain before electing to use our services.

## **7. Your Choices**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

## **8. Data Security.**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. This applies to any private keys you may use in relation to our Website or our services. We strongly encourage you not to share your password or private keys with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **9. Special Disclosures for European Users.**

Under the European General Data Protection Act, every European user is entitled to the following:

- **The right to access** – You have the right to request copies of your personal data from us. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete any information you believe is incomplete.

- **The right to erasure** – You have the right to request that we erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to our processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us [legal@aloelabs.us](mailto:legal@aloelabs.us).

#### **10. Changes to Our Privacy Policy.**

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our users' personal information, we will signal such by updated the “modified date” at the top of this Policy. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Privacy Policy to check for any changes.

#### **11. What if I Have Questions About This Privacy Policy?**

If you have any questions about this Privacy Policy, please send us a detailed message to [legal@aloelabs.us](mailto:legal@aloelabs.us) and we will try to resolve your concerns and provide further information.