

## Arus Privacy Policy

**ARUS CONSULTING AG**, A COMPANY DULY ESTABLISHED UNDER THE LAWS OF SWITZERLAND, WITH REGISTRY NUMBER CHE-270.493.933 HAVING ITS REGISTERED SEAT AT ALPENBLICKSTRASSE 7, 8853 LÄCHEN SZ, SWITZERLAND (“**ARUS**”, “**WE**”, “**US**” OR “**OUR**”) IS COMMITTED TO PROTECTING AND RESPECTING YOUR PRIVACY.

THIS PRIVACY POLICY (TOGETHER WITH ARUS TERMS OF USE AS THEY MAY BE PUBLISHED ON OUR WEBSITE ARUS.EXCHANGE (“**WEBSITE**”) AND ANY OTHER DOCUMENT PUBLISHED AND REFERRED TO ON THE **WEBSITE**, AS THEY MIGHT BE AMENDED FROM TIME TO TIME) SETS OUT THE BASIS ON WHICH ANY PERSONAL DATA WE COLLECT FROM YOU, OR THAT YOU PROVIDE TO US, WILL BE PROCESSED BY US. THIS PRIVACY POLICY APPLIES TO OUR SERVICE OF AN ARUS E-WALLET SOFTWARE ACCESSIBLE VIA ARUS WEBSITE OR MOBILE APPLICATION (“**SERVICES**”).

PLEASE READ THE FOLLOWING CAREFULLY TO UNDERSTAND OUR VIEWS AND PRACTICES REGARDING YOUR PERSONAL DATA AND HOW WE WILL TREAT IT. BY VISITING THE WEBSITE OR THE ARUS MOBILE APPLICATION, ARUS PLATFORM AND ACCESSING AND USING THE SERVICES, YOU ARE ACCEPTING AND CONSENTING TO THE PRACTICES AND PROCEDURES DESCRIBED IN THIS PRIVACY POLICY.

WE RESERVE THE RIGHT TO AMEND OR MODIFY THIS PRIVACY POLICY AT ANY TIME AND IN RESPONSE TO CHANGES IN APPLICABLE LAW OR OUR BUSINESS PRACTICES. ANY CHANGES WE MAY MAKE TO OUR PRIVACY POLICY IN THE FUTURE WILL BE POSTED ON THIS PAGE AND, WHEN APPROPRIATE AND NECESSARY, NOTIFIED TO YOU BY E-MAIL. PLEASE CHECK BACK FREQUENTLY TO SEE ANY UPDATES OR CHANGES TO OUR PRIVACY POLICY.

### 1. Information we may collect from you

We may collect and process the following data about you as a user of our Services, our Website or Arus Platform (“**User**”):

#### a) Information you give us

We require people who create an Arus Account (“**Account**”) and register to Arus Platform to access and use the Services to give us certain contact information and information necessary for provision of our Services.

To identify you as a User of the Services and to better serve all Users, you may be asked to provide the following personal identifiable information, depending on the services chosen:

- your name and family name;
- phone number;
- email address;
- public wallet address that you generate through Arus e-wallet;

If you believe that someone has provided us with your personal information and you would like to request that it be removed from our database, please contact us at **support@arus.exchange**.

We will hold the above information for as long as is necessary in order to provide you with the Service on the Website and Arus Platform, deal with any specific issues that you may raise or otherwise as is required by the applicable law.

#### b) Information we collect about you

With regard to each of your visits to the Website and access the Platform or the Services we may automatically collect the following non-personally identifiable information:

- information about your visits, including the full Uniform Resource Locators (URL) clickstream to, through and from the Website (including date and time);
- products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information with regard to the provision of Services we might receive from any other sources.

In order to perform the full range of functions through our Arus mobile application we might require you to give us the following permissions:

- permission to access your geolocation, as we need this to adapt our services.
- **[OTHER]**.

We may receive information about you from publicly available sources. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and may receive information about you from them.

We may collect certain information if you choose to contact us, if you use our Services or if you report a bug or other error with Arus e-Wallet. This may include contact information such as your name, email address, phone number, and public wallet address. We, or companies that provide services on our behalf, may also collect certain non-personally identifiable information from you, such as your locally hosted public wallet addresses.

### **c) Cookies**

The Website uses cookies to distinguish you from other Users of the Website. This helps us to provide you with a good experience when you browse the Website and also allows us to improve the Website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

## **2. Uses made of the information**

We use information held about you in the following ways:

- to contact you when necessary or to respond to your questions;
- to provide you with Services offered through the Website, Arus mobile application and the Arus Platform and to enhance the Services;
- to provide you with information about other services that you request or that we offer which are similar to those that you have already purchased/provided or enquired about and for announcements of promotions and events regarding Arus or our partners;
- to notify you about changes to our Services;
- for internal business purposes;
- to resolve claims or reclamations filed with any of our business partners, which form a part of the Arus network;
- to ensure that content from the Website, Arus mobile application and Arus Platform is presented in the most effective manner for you and for your computer;
- to prevent fraud and other prohibited or illegal activities;

- to protect the rights and safety of our affiliated entities and third parties, as well as our own;
- to monitor compliance with our terms and conditions and other policies as they may be published on our Website and amended from time to time;
- to ensure you receive information relevant to you;
- to administer the Website, Arus mobile application and Arus Platform for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to allow you to participate in interactive features of our Services, when you choose to do so;
- as part of our efforts to keep the Arus Platform, Arus mobile application and the Website safe and secure.

### **3. Disclosure of your information**

We do not distribute or share any customer personal information, except as outlined in this Privacy Policy (see below), or as may be required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process.

We may disclose your personal information or non-personally identifiable information to third parties in the following events and with the following persons:

- with Google Analytics (for the purpose of analyzing the visits to our site);
- if Arus or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers and Users will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
- to keep you up-to-date on the latest service announcements, updates, special offers or other information that we think you'd like to hear, either from us, our business partners or third parties;
- in order to enforce or apply our other policies published on our Website and any other relevant agreements;
- or to protect the rights, property, or safety of Arus, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;
- our employees, contractors, agents, service providers, and designees to enable them to perform certain services for us exclusively; or
- as otherwise outlined in this Privacy Policy.

Certain features on Arus e-wallet rely on various third-party products and services ("**Third Party Services**"), such as the Blockchain network, Google Analytics, and others. These services may collect certain personal information, such as your public wallet address. Please note that your use of these Third Party Services is governed by their respective terms of service and privacy policies. We only use and disclose any collected information in accordance with our own Privacy Policy.

We will not otherwise provide your personal data to a third party without obtaining your prior consent.

### **4. Correcting, Deleting and Updating Your Information**

Upon request, we will provide you with information about whether we hold or process any of your personal information, whether on behalf of a third party or otherwise. To request this information, please contact us at [support@arus.exchange](mailto:support@arus.exchange).

If your personally identifiable information changes, or if you no longer desire our Services, you may correct, update, discontinue the use of our Services or delete it by making the change on our member information page or by emailing our Support team at [support@arus.exchange](mailto:support@arus.exchange). We will respond to your request within 30 days.

We will retain your information for as long as your account is active or as needed to provide you the Services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

We use a third party platform host, who hosts the forms on our site, and is bound by privacy policy in compliance with EU laws.

We may enable the Users the possibility to use the Services to host data and information. We will not review, share, distribute, print, or reference any such data except as provided in this Privacy Policy or any other policy published on the Arus Website, or as may be required by law.

We will view or access individual records only with your permission (for example, to resolve a problem or support issue). Users of the Services are responsible for maintaining the confidentiality and security of their user registration and passwords.

## **5. Where we store your personal data**

The data that we collect will be stored on the cloud based in the European Economic Area ("EEA").

Please note that by visiting and using the Website and Arus Platform, and giving us your personal data, you consent to your personal data being collected, used, processed, disclosed and stored by us, only as described in the terms and conditions as they may be published on our Website and this Privacy Policy.

If you are a user accessing the Services from outside of the EEA, please be advised that through your continued use of the Services, which is governed by laws of Switzerland, you are transferring your Personal Information to the EEA and you consent to that transfer.

## **6. Safeguarding personal data**

The communication internally between our servers (e.g. between application server and database) is handled via secure socket layer ("SSL") to provide AE-256 encryption and all information between our servers and your browser is handled via SSL (up to 256-bit encryption, depending upon your browser), providing an industry-standard level of protection for data in-transit.

You should always make sure that your browser can validate the Website's certificate.

All encrypted data is signed using a message authentication code (MAC) so that the underlying value cannot be modified once encrypted. We also implement an advanced security method based on dynamic data and encoded session identifications and hosts the Services in a secure server environment using preventive, detective and corrective technology and processes to safeguard information from attackers. Finally, we require unique usernames and passwords that must be entered each time a customer logs on. These safeguards help prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of data.

The security of your personal information is important to us. When you enter sensitive information such as order forms, we encrypt that information using transport layer security (TLS) technology. We also encrypt any information entered within the platform once users log into their accounts. If you have any questions about security on our Website, Arus mobile application and Arus Platform, you can contact us at [support@arus.exchange](mailto:support@arus.exchange)

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website, Arus mobile application and Arus Platform, you are responsible for keeping this password confidential. Your passwords are stored on our servers in encrypted form using a one-way hashing algorithm. Please be reminded that you must protect any passwords or other credentials associated with your account for the Services, and take full responsibility for any use of the account under your password. We ask you not to share your password with anyone.

Please note that you are solely responsible for keeping your private key, which enables your access to your Arus e-Wallet secure. Arus does not store or have access to your private key and cannot help you recover it in case of loss.

Unfortunately, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your data transmitted to the Website, although we will do our best to protect your personal data. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

We also warn you to be careful to access our services through our official Website (suggest you to save the link to it), to protect yourself against any potential phishing attacks (you can learn more about such attacks here: <https://en.wikipedia.org/wiki/Phishing>). To act in accordance with our efforts and help ensure a safe transmission you should avoid any suspicious links to fake websites and other phishing attacks.

## **7. Your rights and access to information**

You may ask us not to process your personal data for a particular purpose, or to access such information, by contacting us at [support@arus.exchange](mailto:support@arus.exchange). Please note, however, that you shall remain liable for any fees or costs incurred at the time of the withdrawal of your consent to process your personal data.

The Website may, from time to time, contain links to other third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies (including, as the case may be, landing pages of other Arus products or services; i.e. other than Arus Platform) and that we do not accept any responsibility or liability in respect of these policies. Please check these policies before you submit any personal data to these websites.

## **8. Opt-Out Statement**

We offer you a means to choose how we may use the information you provide. If, at any time after registering for information or ordering the Services, you change your mind about receiving certain email communications from us or about sharing personal information with third parties, unsubscribe from such promotional emails by clicking the link provided at the bottom of each of such email (or send us a request to opt-out from receiving promotional emails or from having your personal information shared with third parties; you can send your request to [support@arus.exchange](mailto:support@arus.exchange)).

## **9. Social Media Widgets**

Our Website and Arus Platform may include Social Media Features, such as the Facebook button and Widgets, such as the Share this button or an interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these Features are governed by the privacy policy of the company providing it.

## **10. Additional and Contact Information**

If you have questions, concerns or suggestions related to our Privacy Policy or our privacy practices or the security practices of the Services you may contact us at [support@arus.exchange](mailto:support@arus.exchange).

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