**Tresso Asset Network Privacy Policy**

**Last Updated: October, 2019**

# **Introduction.** Tresso Asset Network Inc. (“**Company**”, “**our**”, “**us**”, “**we**”, “**Tresso**”, “**Tresso Asset Network**”) understands the importance of privacy, especially when it comes to your Personal Information. Data privacy and your trust are our top priorities, and in this Privacy Policy (“**Privacy** **Policy**”) we explain what information we collect from you when you use our Tresso Services (collectively, the “**Tresso Services**”), including our digital asset exchange platform for the trading of supported Digital Assets for other Digital Assets (the "**Marketplace**"), how we will use this information, and the very limited ways that we may share your information. This Privacy Policy does not apply to any Third Party websites, marketplaces or applications, even if they are accessible through our Services. Please read this policy carefully to understand our policies and practices regarding your information, as you consent to the collection, use, and disclosure of Personal Information (as defined below). If you do not agree with our policies and practices, do not use Tresso Services.

This Privacy Policy is incorporated by reference into our [Terms of Use](https://www.thistle.co/terms-of-use/) and subject to the provisions of the Terms of Use. All other terms not defined herein will have the meanings set forth in the Terms of Use.

# **Who May Use our Services**.

Tresso Services are only intended for adults eighteen (18) years of age and older. We do not knowingly collect Personal Information from persons under the age of 18. If we learn that we have collected any Personal Information from persons under the age of 18, we will promptly take steps to delete such information and terminate their account.

# **Scope**. This Privacy Policy applies to Personal Information that is Processed (as defined below) by Tresso in the course of our business, including on our Marketplace. All persons whose responsibilities include the Processing of Personal Information on behalf of Tresso are expected to protect that data by adherence to this Privacy Policy.

# **Personal Information We Collect and How We Use It**. We collect several types of information from and about customers, users and visitors (collectively “**Individuals**”) depending on how they are using the Tresso Services, including:

## Types of Personal Information We Collect

### Information You Provide Directly to Us. When you use the Tresso Services or engage in certain activities, such as registering for an Tresso account with us, creating a digital asset wallet and using digital assets on our digital asset exchange platform, requesting information, or contacting us directly, we may ask you to provide the following types of information:

### Account Information. If you create an account, we may collect certain information that can be used to identify you. The requested information may include (i) for individuals, certain personal information, including your name, address, telephone number, e-mail address, gender, date of birth, username, and encrypted password which enables you to utilize certain features of the Tresso Services; and (ii) for entities, information about its business, financial condition, corporate structure, shareholders, directors, officers, ultimate beneficial owners, agents and other representatives. We may also collect additional information about you that is needed to complete Know Your Customer (“**KYC**”) and Anti-Money Laundering (“**AML**”) checks, such as address, birthdate, tax ID number, government issued ID, bank account information and cryptocurrency wallet addresses.

### Communications with Us. We may collect Personal Information from you such as name, phone number, email address, or mailing address when you choose to request information about our Services, request to receive customer or technical support, or otherwise communicate with us.

### Automatic Data Collection. We may collect certain information automatically through our Services or other methods of web analysis, such as your Internet protocol (IP) address, cookie identifiers, and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type and language, geo-location information, hardware type, operating system, user settings, location information, mobile carrier, Internet service provider, pages that you visit before and after using the Tresso Services, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the Marketplace, and other actions taken through use of the Marketplace such as preferences. Although we do not correlate tracking information to Individuals, some information collected, such as IP addresses, will be unique.

### Do Not Track Settings. Do Not Track (“**DNT**”) is a privacy preference that Individuals can set in certain web browsers. DNT is a privacy preference that Individuals can set in certain browsers to inform websites that they do not want certain information about their webpage visits collected over time and across websites or online Marketplace. We do not track, plant cookies, or use advertising when a DNT browser mechanism is in place.

### Information from Other Sources. We may receive information about you from other sources, including through our service providers who perform the KYC and AML checks. These service providers may collect information from other sources in order to supplement information provided by you. Information we collect through our service providers may include your name, government issued identification number, location, gender, birth date, and email address. This supplemental information allows us to verify information that you have provided to us and to enhance our ability to provide you with information about our business, products, and Services.

## How We Use Your Information

From time to time, it is necessary for customers to supply us with personal data in connection with the opening or continuation of accounts, the use of the services on the Marketplace, or in compliance with any laws or guidelines issued by regulatory or other authorities. We use information that we collect about you or that you provide to us, including Personal Information:

### To provide you with information, products, or services that you request from us. We may use information about you to:

* + Generally manage customer information and accounts;
  + To provide you with information, products, or services that you request from us;
  + Provide access to certain areas, functionalities, and features of our Marketplace; and
  + Contact you to answer requests for customer support or technical support.

### Administrative Purposes. We may use Personal Information about you for administrative purposes, including to:

* + Measure interest in our Services;
  + Ensure internal quality control;
  + Verify Individual identity;
  + Communicate about Individual accounts and activities on our Marketplace and systems, and, in our discretion, changes to our Services or any of our policies;
  + Send email to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, or system maintenance;
  + Verify the information that you provide to use and validate you through the KYC/AML process required by our fiduciary partners;
  + Meet the requirements to make disclosures under the requirements of any law binding on the Marketplace under and for the purposes of any guidelines issued by regulatory or other authorities with which the Marketplace is expected to comply;
  + Process payment for products or Services purchased;
  + Provide you with notices about your account and payments;
  + Process applications and transactions;
  + Prevent potentially prohibited or illegal activities;
  + Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection and
  + Enforce our Terms.

### Limiting Use, Disclosure and Retention. We will not use your Personal Data for any purpose that you have not consented to. Tresso will NOT sell or trade Personal Data for commercial purposes. We will only use Personal Information to provide you with important messages about our Services and transactional communications regarding your activity on our website, such as deposit and withdrawal notifications.

### Anonymous and Aggregated Information Use. We may use Personal Information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our Services, or other analyses we create. Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors’ interest in and use of various portions or features of the Tresso Services. Anonymized or aggregated information is not Personal Information, and we may use such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within us and with Third Parties for our or their purposes in an anonymized or aggregated form designed to prevent anyone from identifying you.

### Other Uses. We may use Personal Information for which we have a legitimate interest, such as direct marketing, individual or market research, anti-fraud protection, or any other purpose disclosed to you at the time you provide Personal Information or with your consent.

## Cookies, Pixel Tags/Web Beacons, Analytics Information, and Interest-Based Advertising

We, as well as Third Parties that provide content or other functionality on our Marketplace, may use cookies, pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through the Tresso Services. We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a "**device**") that allow us to record certain pieces of information whenever you visit or interact with our Services, applications, messaging, and tools, and to recognize you across all relevant devices.

### Cookies. Cookies are small text files placed in visitors’ devices to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, some features of the Tresso Services may not work properly.

### Pixel Tags/Web Beacons. A pixel tag (also known as a web beacon) is a piece of code embedded on the Site or the App that collects information about Individuals’ engagement on the Site or the App. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.

Our uses of such Technologies fall into the following general categories:

* Operationally Necessary. We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our Services, applications, and tools. This includes technologies that allow you access to our Services, applications, and tools; that are required to identify irregular Service behavior, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping-carts, saved search, or similar functions;
* Performance Related. We may use cookies, web beacons, or other similar technologies to assess the performance of our applications, Services, and tools, including as part of our analytic practices to help us understand how our visitors use our Services, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, Services, or tools;
* Functionality Related. We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into your account or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content;
* Advertising or Targeting Related. We may use first-party or Third Party cookies and web beacons to deliver content, including ads relevant to your interests, on our Site, or on Third Party websites. This includes using Technologies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as whether you have clicked on an advertisement.

If you would like to opt out of the Technologies we employ through our Services, applications, or tools, you may do so by blocking, deleting, or disabling them as your browser or device permits. Please note however that certain functionality of the Tresso Services may not be available or function properly if you opt out of certain Technology uses.

# **Disclosure of Your Information**

We only collect Personal Information that we believe to be relevant and required to conduct our business. We may share your Personal Information with our service providers, but only to the extent that they each need to know specific information to continue to provide Services to you. This includes:

### Vendors and Service Providers. We may share any information we receive with vendors and service providers. The types of service providers (processors) to whom we entrust Personal Information include service providers for: (i) provision of IT and related services; (ii) provision of information and Marketplace you have requested; (iii) payment processing; (iv) customer service activities; (v) fraud prevention; and (vi) in connection with the provision of the services, including KYC/AML checks. We have executed appropriate contracts with the service providers that prohibit them from using or sharing Personal Information except as necessary to perform the contracted Marketplace on our behalf or to comply with applicable legal requirements.

### Disclosures to Protect Us or Others (e.g., as required by law and similar disclosures). We may access, preserve, and disclose your Personal Information, other account information, and content if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect your, our or others’ rights, property, or safety; (iv) enforce our policies or contracts; (v) collect amounts owed to us; (vi) prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) disclose your Personal Information in good faith where it is otherwise necessary or advisable.

### Security Reasons. In addition, from time to time, server logs may be reviewed for security purposes – e.g., to detect unauthorized activity on the Marketplace. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify Individuals in connection with their investigation of the unauthorized activities.

### Merger, Sale, or Other Asset Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such event, we will endeavor to direct the transferee to use Personal Information in a manner that is consistent with the Privacy Policy in effect at the time such Personal Information was collected.

### For any other purpose disclosed by us when you provide the information. We may disclose aggregated information about our users, which means information that does not identify any individual, without restriction. As an example, we may include in our marketing materials that a certain percentage of our users are female, but we will not share a list of the female users in these materials.

# **International Data Transfers**. You agree that all Personal Information collected via or by us may be transferred, Processed, and stored anywhere in the world, including but not limited to the United States, in the cloud, on our servers, on the servers of our affiliates or the servers of our service providers. Your Personal Information may be accessible to law enforcement or other authorities pursuant to a lawful request. By providing information to us, you explicitly consent to the storage of your Personal Information in these locations.

# **Opt-Out (Right to Object to Processing)**

## General. You have the right to object to and opt out of certain uses and disclosures of your Personal Information. Where you have consented to our Processing of your Personal Information or Sensitive Personal Information (as defined below), you may withdraw that consent at any time and opt out of further Processing by contacting us as described below.

## Email and Telephone Communications. If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. We will process your request within a reasonable time after receipt. Note that you will continue to receive transaction-related emails regarding products or Marketplace you have requested. We may also send you certain non-promotional communications regarding us and our Marketplace and you will not be able to opt out of those communications (e.g., communications regarding updates to our Terms or this Privacy Policy).

### We maintain telephone “do-not-call” lists as mandated by law. We process requests to be placed on do-not-phone and do-not-contact lists within 60 days after receipt, or such shorter time as may be required by law.

# **Rights of Access, Rectification, Erasure, and Restriction**. You can review and change your Personal Information by logging into the Marketplace and visiting your account page. You may also inquire as to whether we are Processing Personal Information about you or request access to your Personal Information. Where otherwise permitted by applicable law, you may contact us as described below or use any of the methods set out in this Privacy Policy to request access to, receive (port), seek rectification, or request erasure of Personal Information held about you by us. Please include your full name, email address associated with your account, and a detailed description of your data request. Such requests will be Processed in line with local laws.

We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. Although we make good faith efforts to provide Individuals with access to their Personal Information, there may be circumstances in which we are unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others’ privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the Individual’s privacy in the case in question or where it is commercially proprietary. If we determine that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, we will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

# **Data Retention**. We retain the Personal Information we receive as described in this Privacy Policy for as long as you use our Marketplace or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

# **Security of Your Information**. We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access. All user information is encrypted through the Marketplace with Secure Socket Layer technology (SSL) and is also encrypted when it is stored by us to prevent unauthorized parties from viewing such information. Also, we perform regular malware scanning of the Marketplace and all servers and computers used by us to support the Marketplace. All Company employees are required to adhere to our security and confidentiality procedures and undergo training related to maintaining the security of user Personal Information. The safety and security of your information also depends on you. Where you have chosen a password for access to certain parts of the Marketplace, you are responsible for keeping this password confidential. We ask you not to share your password with anyone and be careful about giving out information to other Individuals on the Marketplace if requested. 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 the Marketplace. 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 Marketplace, and we do not accept liability for unintentional disclosure.

By using our Services or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Tresso Services. If we learn of a security system’s breach, we may attempt to notify you electronically by making a notice available to you through the Marketplace or sending an e-mail to you. You may have a legal right to receive this notice in writing.

# **International Users**. By using the Marketplace, we will transfer data to the United States and other global jurisdictions. By choosing to use the Marketplace or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy and the adjudication of any disputes arising in connection with the Marketplace will be in accordance with the Terms of Use.

The Marketplace currently does not permit users based in the European Economic Area (EEA). If you are visiting from a region outside of the EEA which has laws governing data collection and use, please note that you are agreeing to the transfer of your information to the United States and to Processing of your data globally. By providing your Personal Information, you consent to any transfer and Processing in accordance with this Privacy Policy.

# **Third Party Links.** Our website may contain links that lead to other websites, and Tresso is not responsible for the privacy practices, content, and/or activities of these linked websites. Nonetheless, we seek to protect the integrity of our Services and welcome any feedback about these external websites.

# **Redress/Compliance and Accountability**. If you have any questions about our privacy practices, this Privacy Policy, or how to lodge a complaint with the appropriate authority, please contact us as described below. We will address your concerns and attempt to resolve any privacy issues in a timely manner.

# **Other Rights and Important Information**

## Changes to our Privacy Policy and Practices. This Privacy Policy may change from time to time. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you use the Marketplace after we make the updated Privacy Policy available to you. If at any point you do not agree to any portion of the Privacy Policy then in effect, you must immediately stop using the Marketplace.

### Revision to the Privacy Policy. We may revise this Privacy Policy in our sole discretion, so review it periodically. If you continue to access or use the Marketplace made available to you after such changes have been made, you are deemed to have provided your consent to the changes.

### Posting of Revised Privacy Policy. If there are any material changes to this Privacy Policy, we will notify you by email or as otherwise required by applicable law. We will post any adjustments to the Privacy Policy on the Site, and the revised version will be effective immediately when it is posted (or upon notice as applicable).

### New Uses of Personal Information. Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt out. Where consent of the Individual for the Processing of Personal Information is otherwise required by law or contract, we will endeavor to comply with the law or contract.

# **Definitions**. The following capitalized terms will have the meanings herein as set forth below.

* “**Agent**” means any Third Party that Processes Personal Information pursuant to the instructions of, and solely for, us or to which we disclose Personal Information for use on its behalf.
* “**Personal Information**” is any information relating to an identified or identifiable natural person (“**Individual**”).
* “**Process**” or “**Processing**” means any operation which is performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
* “**Sensitive Data**” or “**Sensitive Personal Information**” is a subset of Personal Information which, due to its nature, has been classified by law or by policy as deserving additional privacy and security protections. Sensitive Personal Information includes Personal Information consisting of the following data elements: (1) race or ethnic origin; (2) political opinions; (3) religious or philosophical beliefs; (4) trade union membership; (5) genetic data; (6) biometric data where Processed to uniquely identify a person; (6) health information; (7) sexual orientation or information about the Individual’s sex life; or (8) information relating to the commission of a criminal offense.
* “**Third Party**” is any company, natural or legal person, public authority, agency, or body other than you, us or our Agents.

# **Contact Us**. If you would like to contact us about our privacy practices, or exercise any of your data subject rights, please send a written request to us at [service@Tresso.com](mailto:service@FF.com).