

# Commun Privacy Policy

Effective as of 29 November 2019

## Introduction and Scope

Commun Ltd. is a company incorporated in the Cayman Islands and located at Genesis Building, 5th Floor, Genesis Close, PO Box 446, Cayman Islands, KY1-1106 (“**Commun**”, “**we**”, “**us**”, “**our**”) understands that your privacy is important and that it is essential to be transparent with our users. This Privacy Policy (“**Policy**”) is designed to explain how we collect, use, process and store your personally identifiable information (“**Personal Data**”) in connection with your use of our website <https://commun.com/> or working with platform, mobile website, its mobile apps, widgets, other online products (“**Platform**”) and other **Services** available via our Platform.

## IMPORTANT INFORMATION

Our Platform displays what is stored on the CyberWay Blockchain, and is a client that allows users to store data on the CyberWay Blockchain. You can compare Commun.com to applications built on top of other blockchains, like [Bancor](#) built on Ethereum platform, or [Augur](#) built on Ethereum platform as well.

For the sake of clarity, Commun does not have control over the CyberWay Blockchain. It is built using smart contracts executed by CyberWay Blockchain. CyberWay is a third-party permissionless platform based on the distributed ledger technology (blockchain). It has its own peculiarities regarding the recording, processing, and storing personal information. For more information regarding the CyberWay Blockchain, please visit its website at <https://cyberway.io/>.

While the CyberWay Blockchain is not controlled by Commun, Commun is capable of limiting the ability of users to see certain information stored on the CyberWay Blockchain (e.g., sensitive content) on <https://commun.com>. Commun can ban certain users from accessing the Platform or some of its communities. Please, read our [Whitepaper](#) for more information.

Additionally, Commun helps users to generate private keys for their accounts. It should be noted that Commun does not store the private keys of users.

When you use our Platform, we may collect and process that you confirm your awareness that certain categories of your Personal Data will also be stored deliberately stored the following data on the CyberWay Blockchain:

- profile data such as your username, profile picture, the date on which you register your account, any information you choose to include in the bio section, your posts, comments, subscription to communities, the data concerning upvotes and downvotes for posts, the data on votes and downvotes for Leaders of Commun and of Communities, followers and users you follow including any changes related to such data,
- a public key related to your account/wallet;
- wallet data such as the type and number of tokens you have;
- transaction data such as the details of your transactions, which may include your wallet identification address, the amount or nature of the token subjected to the transaction; and
- any other data that you may provide to use through submitting posts and comments.

**When you use the CyberWay Blockchain through our Platform, you should be aware that due to the decentralized nature of it, certain of your data rights may be limited. If such a result is not desired by you or you do not have enough knowledge regarding the distributed ledger technology, we advise you not to use our Platform and/or the CyberWay Blockchain.**

We may also collect the following categories of Personal Data about you which are not stored on the CyberWay Blockchain:

- registration data such as your mobile number;
- location data such your IP address; and
- communication data and any other information you may include when contacting our support regarding your troubleshooting or support enquiries.

## **How We Receive Personal Data**

We may receive your Personal Data when you register, access or use our Platform or get in contact with us concerning your activities on our Platform.

## **Basis of Processing**

In the context of our data processing activities as a data controller, we may rely on one or more of the following legal grounds for processing your Personal Data:

- the need to perform our obligations under the terms and conditions that are applicable between you and us (i.e. to provide the Platform to you);
- the need to pursue our legitimate interests, such as to improve our Platform and its functionality;
- consent; and
- any other ground, as required or permitted by law in the specific respective context.

## Purposes of Processing

We process your Personal Data for the purposes of:

- giving you access to our Platform and allowing you to use the functionality and the services of the Platform;
- user account registration and administration;
- maintaining and adding to the features and functionality of our Platform;
- enhancing our website's user experience;
- facilitating transactions within the Platform such as the sale or acquisition of Commun tokens via the third party;
- facilitating transactions within the Platform such as the exchange of Commun tokens with Community tokens;
- complying with applicable laws; and
- preventing or detecting fraud, security breaches or illegal activities. For example, we collect IP addresses and phone numbers to prevent the registration of excessive amounts of bots and protect our interests.

## Sharing Personal Data with Third Parties

We may share your Personal Data with certain third-party providers for the purposes of facilitating the provision of our services and the proper functioning of the Platform. We will require that all these third-party vendors maintain at least the same level of data protection that we maintain for such Personal Data.

Such third-party vendors may deliver the following services or software:

- cloud and storage;
- helpdesk and ticketing;
- payment processing;
- online messengers;
- web analytics;
- hosting for software development and version control;
- project management.

## Other Disclosure of Your Personal Data

We may disclose your Personal Data:

- to the extent required by law or if we have a good-faith belief that such disclosure is necessary in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, or private parties, including but not limited to: in response to subpoenas, search warrants, or court orders;

- in connection with a merger, division, restructuring, or other association change; or
- to our subsidiaries or affiliates only if necessary for operational purposes.

If we must disclose your Personal Data in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, we may not be able to ensure that such recipients of your Personal Data will maintain the privacy or security of your Personal Data.

Since our Platform with its features resembles a social media platform, you must understand that your profile and some of the Personal Data connected to the profile is visible to other participants of the Platform.

**Moreover, since you store data via our Platform on CyberWay Blockchain which is open to anyone, it is possible that your data may be accessed and processed by any third party that accesses the CyberWay Blockchain.**

## **Data Integrity & Security**

Commun takes information security very seriously. We work hard to protect the Personal Data you provide us from loss, misuse, or unauthorized access. We utilize a variety of safeguards such as encryption, digital and physical access controls, non-disclosure agreements, and other technical and organizational measures to protect the Personal Data submitted to us, both during transmission and once it is received.

Please note that no electronic transmission, storage, or processing of Personal Data can be entirely secure. We cannot guarantee that the security measures we have in place to safeguard Personal Data will never be defeated or fail, or that those measures will always be sufficient or effective. Therefore, although we are committed to protecting your privacy, we do not promise, and you should not expect that your Personal Data will always remain private or secure.

## **Data Retention Period**

Your Personal Data processed on the Platform will remain on our servers indefinitely except for one of the following situations:

- a governmental agency requests us to remove it;
- we no longer support our Platform;
- a community leader removes your data; or
- you ask us to remove your data.

Sometimes business and legal requirements oblige us to retain certain information, for specific purposes, for an extended period of time. Reasons we might retain some data for longer periods of time include:

- Security, fraud & abuse prevention.
- Financial record-keeping.
- Complying with legal or regulatory requirements.
- Ensuring the continuity of our services.
- Direct communications.

**You should be aware that the data stored on the CyberWay Blockchain will remain there indefinitely. This also means we are unable to make any changes or modifications to data stored in the CyberWay Blockchain as we do not control it.**

## Privacy Rights under GDPR

Under certain circumstances, you may have a number of privacy rights concerning the use, storage, and processing of your Personal Data (e.g., the right to delete your data).

Here is a list of privacy rights:

- **right of access** – you may ask us whether we are processing your Personal Data and you have the right to request a copy of the information we hold about you.
- **right of rectification** – you have the right to correct inaccurate or incomplete Personal Data about you and you have the ability to do so yourself in the settings of your Profile.
- **right to be forgotten** – you can ask for the information that we hold about you to be erased from our system and we will comply with this request unless we will have a legitimate reason not to do so.
- **right to restriction of processing** – where certain conditions apply, you can ask us to ‘block’ the processing of your Personal Data.
- **right to data portability** – you have the right to have the data we hold about you transferred to another organization and to receive Personal Data in a structured, commonly used format.

**Please keep in mind that we are unable to help you fully exercise some of these rights (e.g. the right to be forgotten, rectification and restriction of processing, etc.) in relation to the data which is stored on the CyberWay Blockchain via our Platform. For example, if you request to delete your data from the Platform, we will delete it from our servers and the**

**data will not be visible on our Platform, however, it will remain on the CyberWay Blockchain.**

**Additionally, under certain conditions, leaders of a particular Commun community or Commun may hide certain information from being displayed or moderate such information on the Platform. However, it will never disappear from the CyberWay Blockchain. Finally, certain users can be banned from the Platform; however, we cannot ban users from accessing the CyberWay Blockchain.**

If you wish to learn more about the GDPR and your rights, the [Information Commissioner's Office](#) website is a reliable source.

## **Do Not Track Signals**

Some web browsers may transmit “do-not-track” signals to the websites with which the user communicates. We do not currently take action in response to those signals. If an industry standard on responding to such signals is established and accepted, we may reassess how to respond to those signals.

## **Rights Under the Privacy Laws of California**

If you are a resident of the state of California, you may have certain rights with respect to your Personal Data in accordance with the California Consumer Privacy Act (CCPA) and the California Civil Code as amended by the CCPA. **Some of these rights you may not be able to fully exercise due to the nature of the blockchain technology upon which our Platform is based. For example, if you request to delete your data from the Platform, we will delete it from our servers and the data will not be visible on our Platform, however, it will remain on the CyberWay Blockchain.**

Your rights as a resident of California:

- **right to access** - you may request that we disclose the categories of personal information collected, the categories of sources from which personal information is collected, the business or commercial purpose, the categories of third parties with which the business shares personal information and specific pieces of information that have been shared or sold.
- **right to opt-out** - you are entitled to tell us not to sell personal information about you to third parties.
- **right to deletion** - the right to have your Personal Data deleted.

## Privacy of Children

Our Platform is not directed to collect Personal Data from people under the age of 18. We do not knowingly allow anyone under 16 to submit any Personal Data to our Website. If you believe your child may have provided us with their Personal Data, you can contact us using the information in the Contact Us section of this Policy and we will delete the Personal Data from our Platform.

## Changes to this Policy

If we make any material change to this Policy, we will post the revised Policy to this web page and update the “**Effective on**” date above to reflect the date on which the new Policy became effective.

## Contact Us

If you have any questions about this Policy or the processing of your Personal Data, please contact us at [privacy@commun.com](mailto:privacy@commun.com).

## Supervisory Authority Oversight

If you are a data subject whose Personal Data we process, you may also have the right to lodge a complaint with a data protection regulator in one or more of the European Union member states. [Here](#) you can find a list of data protection authorities in Europe.