

Elk Finance Privacy Policy

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Introduction

Elk Finance and its affiliates (hereinafter, “Elk Finance”, “we”, “us” or “our”) are committed to protecting and respecting your privacy. This Privacy Policy together with our [Terms of Use](#) governs our collection, processing and use of your Personal Data. By accessing Elk Finance, you are confirming to know the contents of the Privacy Policy and consenting to the information collection and specific purposes described in this Privacy Policy.

Elk Finance is the data controller responsible for processing your Information. This Privacy Policy conforms to the best practices and gives you rights by operation of the EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation, “GDPR”).

The purpose of this Privacy Policy is to set out in an accountable and transparent way the collection and use of information by Elk Finance. Information will only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. This data privacy policy applies to our mobile applications as well as to the websites available under the main domain <https://elk.finance/> (“Website” or “Websites”).

Personal Data

"Personal Data" means any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

World Wide Web related information, including but not limited to IP Addresses, operating system and browser type may be received by Elk Finance as a result of your interactions with the Elk Finance Interface.

Elk Finance uses Google Analytics for purposes of monitoring web traffic. Any identifying information collected via Google Analytics is controlled by Google.

Elk Finance processes only pseudonymized data, in such a manner that the Personal Data cannot be attributed to a specific Data Subject without the use of additional information, which are not directly available to Elk Finance.

Please be aware that public blockchains provide transparency into transactions and Elk Finance is not responsible for preventing or managing information broadcasted on a blockchain. In addition, data committed to blockchains cannot be altered or eliminated. To know more about the potential application of GDPR provisions to public blockchains and distributed ledgers please consult this [study](#) commissioned by the European Parliament.

Purpose of Personal Data processing

Data is only processed in order to:

- Provide our services efficiently and effectively;

- Develop, enhance, market and deliver products and services to you;
- Understand your needs and your eligibility for products and services;
- Process billing and collection of any fees;
- Conduct surveys;
- Establish and maintain a responsible commercial relationship with you;
- Meet Elk Finance's legal and regulatory requirements.

Scope of the Data Processing

When using the Websites for information purposes only, i.e. unless you provide us with other information, we only collect the personal data that your browser transmits to our server. When this data is stored, it is not assigned to a specific person. When you view our Website, we collect the following data, which are technically necessary for us to display our Website to you and to guarantee stability and security:

- IP address;
- date and time;
- time zone difference to Greenwich Mean Time (GMT) time zone;
- access status/http status code;
- amount of data transferred in each case;
- website from which the request comes;
- browser (incl. language and version);
- operating system and version of the browser software.

When using services, we will collect and process personal data about you including your wallet address, details of our interactions with you and the services you use.

However, it is crucial to note that the wallet private cryptographic keys are never transmitted to our servers, so it is not possible for us to access your digital assets funds in any case.

Security, Protection and Use of Personal Data

Elk Finance is committed to protecting your privacy. Elk Finance constantly implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including: (a) the pseudonymization and encryption of Personal Data; (b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services; (c) the ability to restore the availability and access to Personal Data in a timely manner in the event of a physical or technical incident.

The security measures in place will, from time to time, be reviewed in line with legal and technical developments. However, we give no guarantee that such misuse, loss, unauthorized access, modification, or disclosure will not occur. There are protective measures that you should take which as well include but are not limited to changing password regularly, not sharing your Personal Data with others unless you clearly understand the purpose of their request and you know with whom you are dealing. This affects particularly the use of the private wallet cryptographic keys that need to be safely protected and stored.

Elk Finance reserves the right to retain and share certain Personal Information in order to meet our regulatory and statutory requirements. In addition, Elk Finance reserves the right to retain and share certain Personal Information with our partners, and third parties acting on behalf of Elk Finance.

Personal Data may be exported outside of the jurisdiction in which you reside. Your Personal Data may be processed and stored in a foreign country or countries. Under those circumstances, the governments, courts, law enforcement or regulatory agencies of that country or those countries may be able to obtain access to your Personal Data according to foreign laws. You

need to be aware that the privacy standards of those countries may be lower than those of the jurisdiction in which you reside. You should note that you are not obliged to give your Personal Information to Elk Finance, but if you choose not to do so, we may not be able to provide our services, or your access to our services may be limited.

Disclosure of Personal Data

We use the Personal Data for the purposes indicated at the time you provide us with such information, and/or otherwise for the purposes set out in this Privacy Policy and/or as otherwise permitted by law. We may make available the Personal Information that you provide to us to our affiliates, agents, representatives, service providers and contractors for these purposes. We also reserve the right to disclose Personal information that Elk Finance believes, in good faith, is appropriate or necessary to enforce our Terms of Use, take precautions against liability or harm, to investigate and respond to third-party claims or allegations, to respond to a court order or official requests, to protect security or integrity of Elk Finance and to protect the rights, property or safety of Elk Finance, our uses or others.

If you request it in writing, we may share your Personal Data with your nominated advisors. Except where disclosure of your Personal Data is required by law or requested by you, we will generally require any third party which receives or has access to Personal Data to protect such Personal Data and to use it only to carry out the services they are performing for you or for us, unless otherwise required or permitted by law. We will ensure that any such third party is aware of our obligations under this Privacy Policy and we will take reasonable steps to ensure that contracts we enter with such third parties binds them to terms no less protective of any Personal Data disclosed to them than the obligations we undertake to you under this Privacy Policy or which are imposed on us under applicable data protection laws.

If Elk Finance is involved in a merger, acquisition, sale, bankruptcy, insolvency, reorganization, receivership, assignment or the application of laws or change of control, there may be a disclosure of your information to another entity related to such an event.

Access and Changing of Personal Data

You have the right to access the Personal Information we hold about you, and to require the correction, updating and blocking of inaccurate and/or incorrect data by sending an email to us. We will aim to respond to your request within 14 days. You may also request the deletion or destruction of your Personal Data or your Transaction details by sending an email to us. At any rate, Elk Finance is not responsible for preventing, managing or erasing information broadcasted on a public blockchain.

Elk Finance will act on your request only when it is not inconsistent with its legal and regulatory obligations and compliance procedures. Upon your written request, we will inform you of the use and general disclosure of your Personal Data.

Retention of Personal Data

We will hold your Personal Data only for as long as it is necessary for us to do so, having regard to the purposes described in this Privacy Policy and our own legal and regulatory requirements. In general, we usually retain information about Transactions on your for a period of [5] years from the date of the Transaction. Personal Information which is collected for other purposes will be discarded in accordance with our policies in place from time to time. Please note that public blockchains provide transparency into transactions and Elk

Finance is not responsible for preventing or managing information broadcasted on a blockchain.

Users Under Age of 13

Elk Finance does not knowingly collect or store any personal information about children under 13 without verifiable prior parental consent. If you believe such information has been inadvertently processed, we will take necessary steps to remove such information from our database. Users under 13 must seek and obtain parental consent to use this website.

Links

There may be links from our Site to other sites and resources provided by third parties. This Privacy Policy applies only to our Site. Accessing those third-party sites or sources requires you to leave our Site. We do not control those third party sites or any of the content contained therein and you agree that we are in no way responsible or liable for any of those third party sites, including, without limitation, their content, policies, failures, promotions, products, services or actions and/or any damages, losses, failures or problems caused by, related to or arising from those sites. We encourage you to review all policies, rules, terms and regulations, including the privacy policies, of each site that you visit.

Specific Consent

In the absence of other legal basis, consent is required for the collection of Personal Data and the subsequent use or disclosure of Personal Information. Consent is given in presence of a conduct which clearly indicates the Data Subject's acceptance of the proposed processing of his or her personal data. Your agreement with Elk Finance's Terms of Use constitutes your freely given, specific, informed and unambiguous indication to consent to the processing and use of Personal Data as described in this Privacy Policy. As described in this Privacy Policy, Elk Finance reserves the right to use and disclose Personal Information without your knowledge or consent as permitted by applicable law.

Changes

Our policies, content, information, promotions, disclosures, disclaimers and features may be revised, modified, updated, and/or supplemented at any time and without prior notice at the sole and absolute discretion of the Company. If we change this Privacy Policy, we will take steps to notify all Users by a notice on our website and will post the amended Privacy Policy on the website.

Contact

If you have any questions, comments, or concerns regarding our Privacy Policy and/or practices, please contact us at legal@elklabs.org.