

# IOV Privacy Policy

Updated on March 25th, 2019

## Full Policy

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This Privacy Policy discloses the privacy practices for the IOV website (collectively, the “Website” located at <https://www.iov.one>). IOV SAS, a French company, the provider of the Website (referred to as “us” or “we”), is committed to protecting your privacy online. Please read the following to learn what information we collect from you (the “User” or the “End User”) and how we use that information. If you have any questions about our privacy policy, please email us.

BY ACCESSING OR USING OUR WEBSITE, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND TO ALL THE TERMS OF THIS PRIVACY POLICY AND OUR WEBSITE TERMS OF USE. IF YOU DO NOT AGREE TO THESE TERMS, EXIT THIS PAGE AND DO NOT ACCESS OR USE THE WEBSITE.

## Types of Information Collected

We process the following personal information about you:

Information that you provide to us

IOV processes every information that you choose to provide to us as well as the following data:

- Your first name, name, and gender;
- Citizenship;
- Mailing address, email, phone number;
- Name of your company, position;
- Email;
- IP address;
- Every information necessary for the provision our services pursuant to a contract (payment information, services history...);
- Login and access codes;
- Social media profile;
- Your preferences about commercial solicitation.

Recruitment data

- Your resume, photo, diplomas, letters;
- Data generated by interviewers and recruiters, based on their interactions with you or basic Internet searches;

- Recommendations provided on your behalf by others;
- Documentation required under immigration laws;
- Data about your prior employment, education, and where applicable, credit history, or other data revealed during background screenings.

Your personal information is collected when:

- You register on our Website;
- You subscribe to our newsletter;
- You contact us;
- You purchase IOV Tokens;
- You interact with our company.

## **Use of your personal information**

IOV will only process your personal data for the following purposes:

- To visit our Website;
- To activate your account;
- To provide our services and execute our contractual obligations;
- To ensure communication on our services and customize our offers;
- To provide our newsletter;
- To understand and answer your expectations, comments, and suggestions;
- To analyze and predict your preferences so that we can offer you tailored services or that may interest you;
- To send you marketing communications;
- Conduct surveys, analysis, and statistics;
- Inform you of the improvement of our services;
- In case of recruitment, to process your applications;
- To comply with our regulatory requirements;
- If any, to process your claims.

Also, we may aggregate and/or anonymize your data so that it will no longer be considered as personal data. We do so to generate other data for our use, which we may use and disclose for any purpose (including in particular, for statistics, services analyses, provision of new services....

## **What is our legal basis to use or process your personal information?**

Your personal information is only processed by IOV when we have a legal basis to do so and in particular:

- to perform our obligations in accordance with any contract that we may have with you (for instance, to register on our Website, answer your queries, provide our services....);
- in case of consent (by navigating on our Website, clicking on a ticking box...). You may withdraw your consent at any time;
- it is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide our services in the best way

- that we can;
- it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us.

## **Release of Personal Information**

Our commercial partners and companies (the “Third-Party Service Providers”) who work with us for management of our website, performance of our contracts with you, hosting of your data and provision of our business operations exclusively process your personal data within the scope of the missions entrusted to them. These Third-Party Service Providers may contact you directly using the personal data that you provided us or that we obtained lawfully from third parties. We strictly require from our Third-Party Service Providers that they process your personal data in compliance with personal data applicable regulation and to implement appropriate measure to ensure security and confidentiality of your personal information.

We may also release your information when we believe release is appropriate to comply with the law, protect our rights, or if all or part of our assets is transferred to another company.

Lastly, aggregated data, meaning non-identifiable data can be transferred to third parties for marketing, advertising or any other purpose.

## **Location of your personal information**

IOV may transfer your personal information outside of the European Economic Area (EEA) to its subsidiaries and to external suppliers based outside of the EEA. The EEA comprises those countries that are in the European Union (EU) and some other countries that are considered to have adequate laws to ensure personal information is protected.

When transferring your personal information outside of the EEA, IOV will (and will ensure that service providers acting on our behalf agree to) protect it from improper use or disclosure and ensure the same levels of protection are in place as are applied within the EEA.

## **Updating and Correcting Information**

We believe that you should have the ability to access and edit the personal information you provide us. You have the following rights:

- **Access to your information** – You have the right to request a copy of your personal information that we hold.
- **Correcting your information** – IOV ensures to make sure that your personal information is accurate, complete and up to date. At any time, you may ask us to

- correct your personal information.
- **Deletion of your information** – You have the right to ask us to delete personal information about you where i) You consider that we no longer require the information for the purposes for which it was obtained or ii) our use of your personal information is contrary to law or our other legal obligations.
  - **Oppose or restrict how we may use your information** – You may ask us to restrict how we use your personal information or oppose to such a process. In this case, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds.
  - **Opt-out to the reception of newsletters.** You may at any time decide to opt-out to the reception of our newsletters.
  - **Right to data portability** – You have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice (please note that this right is limited to the data you provided to us).

These requests must be addressed by written request to IOV at 55 rue la Boétie, 75008 Paris, France or [privacy@iov.one](mailto:privacy@iov.one).

If our answer is not satisfactory within the time limit set by the applicable law, you may lodge a complaint with the relevant data protection supervisory authority. However, because we keep track of past transactions, you cannot delete information associated with past transactions on the Website. In addition, it may be impossible for us to completely delete all your information because we periodically backup information.

## Security of Information

We take security seriously and take numerous precautions to protect the security of Personally Identifiable Information to protect the personal data that we have under our control from unauthorized access, improper use or disclosure, unauthorized modification, and unlawful destruction or accidental loss.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we employ commercially reasonable security measures to protect data and seek to partner with companies which do the same, we cannot guarantee the security of any information transmitted to or from the Website and are not responsible for the actions of any third parties that may receive any such information.

## Retention period

For visitors to the Website, we will retain relevant personal information for at least three years from the date of our last interaction with you and in compliance with our obligations under the GDPR or similar legislation around the world, or for longer if we are required to do so according to our regulatory obligations.

For service and product provision to any client, we will retain relevant personal information for at least five years from the date of our last interaction with you and in compliance with our obligations under the GDPR or similar legislation around the world, or for longer as we are required to do so according to our regulatory obligations. We may then destroy such files without further notice or liability.

If you no longer want IOV to use your information to provide you with our products and services, you can close your account and IOV will delete the information it holds about you unless IOV needs to retain and use your information to comply with our legal obligations, to resolve disputes or to enforce our agreements.

## **Cookies**

To facilitate and customize your experience with the Website, we store cookies on your computer. A cookie is a small text file that is stored on a User's computer for record-keeping purposes which contains information about that User. We use cookies to save you time while using the Website, remind us who you are, and track and target User interests in order to provide a customized experience. Cookies also allow us to collect information from you, like which pages you visited and what links you clicked on. Use of this information helps us to create a more user-friendly experience for all visitors. Cookies are also placed when you decide to use sharing buttons linked to social networks. We have no access to or control over these cookies. This Privacy Policy covers the use of cookies by our Website only and does not cover the use of cookies by any third party. Most browsers automatically accept cookies, but you may be able to modify your browser settings to decline cookies. Please note that if you decline or delete these cookies, some parts of the Website may not work properly. These following links may help you:

- Internet Explorer:  
<http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies>
- Chrome:  
<http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647>
- Firefox:  
<http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies>
- Safari: <http://docs.info.apple.com/article.html?path=Safari/3.0/fr/9277.html>

**Other Tracking Devices.** We may use other industry standard technologies like pixel tags and web beacons to track your use of our Website pages and promotions, or we may allow our Third Party Service Providers to use these devices on our behalf. Pixel tags and web beacons are tiny graphic images placed on certain pages on our Website, or in our emails that allow us to determine whether you have performed a specific action. When you access these pages or open or click an email, pixel tags and web beacons generate a notice of that action. Pixel tags allow us to measure and improve our understanding of visitor traffic and behavior on our Website, as well as give us a way to measure our promotions and performance. We may also utilize pixel tags and

web beacons provided by our Affiliates and/or Marketing Partners for the same purposes.

Cookies used on www.iov.one

### First party cookies

Cookie name	Purpose	Duration	Strictly necessary (Y/N)
_gid	Performance - Google Analytics	26 Months	N
_gat_UA-123532356-1	Performance - Google Analytics	26 Months	N
_gcl_aud	Performance - Google Analytics	26 Months	N
_ga	Performance - Google Analytics	26 Months	N
__unam	Functionality - ShareThis	24 Months	N
__sharethis_cookie_test__	Functionality - ShareThis	24 Months	N
_hjIncludedInSample	Performance - HotJar	12 Months	N
__cfduid	Strictly Necessary - Cloudflare	24 months	Y
_fbp	Performance - Facebook	24 Months	N
_privy_b	Performance - Privy	24 Months	N
_privy_match_session	Performance - Privy	24 Months	N
_privy_093283B0BA32AB877C312F54	Performance - Privy	24 Months	N

### Third party cookies

Cookie name	Purpose	Duration	Strictly necessary (Y/N)
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YSC	Unknown - YouTube	26 Months	N
PREF	Unknown - YouTube	26 Months	N
GPS	Unknown - YouTube	26 Months	N
VISITOR_INFO1_LIVE	Unknown - YouTube	26 Months	N

## Google Analytics

For more information about Google Analytics cookies, please see Google's privacy policy: Google's Privacy Policy.

Google has developed the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js). If you want to opt out of Google Analytics, you can download and install the add-on for your web browser [here](#).

## Privacy Policies of Third-Party Websites

This Privacy Policy only addresses the use and disclosure of information we collect from you on [www.iov.one](http://www.iov.one). Other websites that may be accessible through this Website have their own privacy policies and data collection, use and disclosure practices. If you link to any such website, we urge you to review the website's privacy policy. We are not responsible for the policies or practices of third parties.

## Children

Minors under the age of 18 may not use the Website. We do not collect personal information from anyone under the age of 18, and no part of the Website is designed to attract anyone under the age of 18. By accessing the Site, you declare that you are older than 18.

You may choose at any time to opt-in to our newsletters.

## Changes to Privacy Policy

If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.

## Contacting Us

For further information about this policy, please contact [privacy@iov.one](mailto:privacy@iov.one).