



# JIBREL NETWORK LEGAL & COMPLIANCE - PRIVACY POLICY

**EFFECTIVE DATE:** NOVEMBER 26, 2018

# Jibrel AG Privacy Policy

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## OVERVIEW

Jibrel AG and its affiliated companies ("Jibrel Network", "Jibrel", "we", "our", "us", "Company") are dedicated to the highest levels of privacy and safe storage of personal information. This document outlines the Company's approach to data collection, storage and sharing.

## WHAT IS COVERED IN THIS POLICY?

The Jibrel Privacy Policy outlines how and what data the Jwallet collects, uses, stores, shares, and protects whenever you use jwallet.network or any other Jibrel Network Services. By using the Jibrel Website and Services, you consent to the data practices prescribed in this document.

Throughout this document, we use the term "personal information" or "personally identifiable information" (PII) to describe information that can be associated with a specific individual and can be used to identify the individual.

This Privacy Policy does not apply to personal information that has been anonymized in such a way that it can no longer be used to identify a specific user. Jibrel takes reasonable precautions, as described herein, to protect your personal information from misuse, unauthorized access, disclosure, alteration, loss, and or destruction.

This Privacy Policy will be updated periodically. It is the responsibility of the user to review any changes in this policy. We will notify you of any changes to this policy in accordance with relevant laws, rules and regulations.

**Last Updated: November 26th, 2018**

## APPLICABILITY: WHEN IS THIS POLICY APPLICABLE?

This policy is applicable to all Information collected through our websites, applications and services (including [www.jibrel.network](http://www.jibrel.network), [www.jwallet.network](http://www.jwallet.network), [www.jibrel.com](http://www.jibrel.com), [www.jibrel.io](http://www.jibrel.io), [www.jwallet.io](http://www.jwallet.io)) and when you interact with us through the use of Jibrel products as described in their respective Terms and Conditions. This Privacy Policy does not apply to third-party integrations or implementations of Jibrel software.

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The text below described what elements are covered by this document:

1. Understanding your Rights
2. Private Key Management
3. Personal Information Collection, Processing & Storage
4. Legal Basis (EEA)
5. Information Retention & Protection
6. Changes to Privacy Policy
7. Contact Us

## SECTION 1. UNDERSTANDING YOUR RIGHTS

Privacy is a fundamental human right and is protected by law.

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), where applicable, to correct your information, to request the deletion or restriction of your information, or to request your information in a structured, electronic format.

Jibrel AG adheres to the EU-US Privacy Shield Framework Principles as defined by the US Department of Commerce.

Please note that we may retain certain information as required by law or for legitimate business purposes. If you would like to exercise any of these rights, please contact **support@jibrel.network**.

## SECTION 2. PRIVATE KEY MANAGEMENT

Your private keys will always remain on your local device and will never be shared with Jibrel.

## SECTION 3. PERSONAL INFORMATION COLLECTION, PROCESSING & STORAGE

This section outlines the different types of Personal Information and how Jibrel collects, processes and stores them.

### A. INFORMATION COLLECTION

#### **Information You share with Us**

We collect and store information you provide to Jibrel through our website, applications, sign-ups, support requests, promotions, sweepstakes, contests, interactive features or feedback surveys.

This information may include your name, email address, username, password, location and any other information you choose to provide.

#### **Information We collect automatically through Trackers & Cookies**

When you visit Jibrel's website, or the Jwallet website, we obtain certain information through automated tools and means, these include but are not limited to cookies, web beacons, server logs, trackers and other related technologies. "Cookies" are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a particular client and website, and can be accessed either by the web server or the client computer. This allows the server to deliver a page tailored to a particular user, or the page itself can contain some script which is aware of the data in the cookie and so is able to carry information from one visit to the website (or related site) to the next. "Web beacons" are used to monitor the activity of a site. A Web beacon is a graphic image, usually no larger than 1 pixel x 1 pixel, that is placed on a website or in an email that is used to monitor the behavior of the user visiting the website or sending the email. It is used in combination with cookies. We may use these technologies to collect information about your device, browsing behavior, usage patterns or activity. The information collected includes but is not limited to your device and browser type, your IP address, identifiers associated with your devices, language and browsing preferences, clickstream data and timestamps.

This information is captured to assist us in (a) remembering your information to simplify the user experience, (b) better understand the user experience and journey and (c) measure the effectiveness of our website and overall communication.

Your browser or third-party plugins may notify you of the cookies we use and how to disable them. We recommend browsing our products and services with cookies enabled, to ensure you are able to use all the features of our Websites.

## B. INFORMATION PROCESSING

### **Personally Identifiable Information (PII)**

Sensitive personal data will be used as intended and will remain on your device. *E.g. Camera Data will only be used for reading QR codes. Camera images will never leave your device.*

### **Physical Location Data**

Your physical location will never be communicated to us, unless you provide prior specific consent.

### **Blockchain Transaction Data**

Your blockchain transactions may be relayed through servers ("nodes") and will be publicly visible due to the public nature of distributed ledger systems.

### **Aggregate Usage Statistics**

We may collect usage information in order to improve functionality and User Experience. This information will be used in an aggregated, anonymized fashion, and never in association with your name, email, or other personally identifying information (Personally Identifying Information).

### **Voluntary Personally Identifiable Information**

You may choose to provide us with personally identifying information in order to participate in certain programs, activate features, or obtain other benefits but you will always be able to use the basic features of the Jwallet without providing personally identifying information. If you provide us with personally identifying information then, notwithstanding any part of this policy, we may use that information in order to provide you with services or to improve the functioning or UI of the Jwallet.

## C. INFORMATION TRANSMISSION & STORAGE

### **Data Confidentiality**

Your personally identifying information will be kept strictly confidential and never provided to third parties.

### **Secure Communication with Our Servers**

All Jibrel servers support HTTPS for secure and encrypted communication.

### **Communication with Third-Party Servers**

Exchange rates, balances, transactions and other blockchain information may be read from, or related to, third-party servers. We cannot guarantee the privacy of your Internet connection.

### **User Support Requests**

If you contact support then as part of the support request we may incidentally collect your personally identifying information but we will endeavor to keep that information secure and confidential. Support information may be managed using a third-party service and further terms of that service may apply to your support request.

## SECTION 4. LEGAL BASIS - EUROPEAN ECONOMIC AREA

If you are an individual residing in the European Economic Area ("EEA"), we collect and process your personal data in full compliance with EU laws and legislation. The legal basis varies by product and service offering, as well as how you may choose to use them.

Personal data collected is used to:

- Provide Jibrel products and services to you
- Improve and develop Jibrel products and services
- Improve and optimize user experience and interfaces
- Proactively identify and prevent fraud
- Other legitimate business purposes

If you have any questions pertaining to the legal basis for processing, contact support at **support@jibrel.network**.

## SECTION 5. INFORMATION RETENTION & PROTECTION

### Information Retention

Data is retained for as long as necessary to deliver products and services to you, as well as other legitimate business purposes. In addition, data is retained in accordance with relevant laws and legislation.

### Information Protection

Jibrel is committed to protecting your personal information. Jibrel has in place policies and procedures to ensure user data is protected from breach or misuse. Jibrel is dedicated towards preventing the accidental, unlawful or unauthorized disclosure, loss, alteration, access, or use of your personal data.

## SECTION 6. CHANGES TO THIS PRIVACY POLICY

Jibrel may change or alter this Privacy Policy from time to time. We will notify of any changes made by revising the Effective Date at the top of this policy document, as well as on the cover page. Jibrel will notify you via email for any changes that legally require direct communication.

## SECTION 7. CONTACT US

If you have any questions or concerns regarding this privacy policy, you may contact us through Jibrel Support at **support@jibrel.network** or via mail:

### Jibrel AG

Attention: Legal & Compliance Dept.  
Baarerstrasse 10, 6302  
Canton of Zug, Switzerland