

OpenGift

Privacy Policy

Last updated: 5/30/2018

OpenGift (“us”, “we”, or “our”) operates <http://www.opengift.io> (the “Site”). We know that you as our users care about how your Personal Information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. By visiting or using the Site you acknowledge and accept the practices and policies outlined in this Privacy Policy, and you consent to our collecting, using, and sharing your information in the following ways.

1. Information Collection and Use

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to your name (“Personal Information”). This policy does not apply to the practices of companies that we do not own or control, or to individuals that we not employ or manage. This policy also does not apply to information you choose to disclose publicly on the Site (i.e., information which is viewable to other Site users), which will not be considered Personal Information. We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for the Site. If you are under 13, please do not attempt to register on the Site or send any information about yourself to use, including your name, address, telephone number, or email address. No one under 13 may provide any Personal Information to us or on the Site. In the event that we learn that we have collected Personal Information from a child under the age of 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at info@opengift.io.

1.1 Personal Information You Provide to Us

We receive and store any information you provide to us. The types of Personal Information collected may include your real name, username, email address, age, birthday, gender, IP address, location, language, transaction related data such as zip code, browser information, browsing history, transactions, comments, and reviews posted, and any other information necessary for KYC and AML data collection. You can choose not to provide us with certain information, but then you may not be able to purchase GIFT tokens or take advantage of some of our features.

1.2 Personal Information Collected Automatically

- Whenever you interact with our Site, we automatically receive and record information on our server logs from your browser including your IP address, "cookie" information, and the page you requested.
- "Cookies" are identifiers we transfer to your computer through your browser that allow us to recognize your browser or mobile device and tell us how and when pages in our site are visited and by how many people. We may also record the referring page that linked

you to us; the page you visit after our site; the ads you see; the ads you click on; other information about the type of Web browser, computer, platform, related software and settings you are using; any search terms you have entered on this Web Site or a referral site; and other usage activity and data logged by our servers. You may be able to change the preferences on your browser to prevent or limit your computer's acceptance of cookies, but this may prevent you from taking advantage of OpenGift's best features.

- We collect usage information and metrics (such as the numbers and frequency of visitors to the Site) through Yandex.Metrica, we only use this data in aggregate form, and not in a manner that would identify you personally. For example, this aggregate data tells us how often users use parts of the Site, so that we can make the Site appealing to as many users as possible. We may also provide this aggregate information to our partners, so that they can understand how often people use their services and our Site, so that they, too, can provide you with an optimal online experience. We never disclose aggregate information to a partner in a manner that would identify you personally.

2. Communications

We may use your Personal Information to contact you with newsletters or policy updates. If you do not want to receive these, you may opt out. If you choose to opt out, keep in mind that some information may be needed to register with us or to take advantage of some of our special features.

3. Will OpenGift share any of the personal information it receives?

We neither rent nor sell your Personal Information to anyone. User profile information, including without limitation your name, email address, and other information may be displayed to other users only if you chose to enter such information on your user profile. Your user profile is public on the Site. You will always have the right to opt-out of any use of your Personal Information at any time, and to retrieve, change or delete your Personal Information. This policy explains when your Personal Information will be shared with third parties and when you will receive different communications if you choose to opt in. If you have any questions on this policy or need to change your consents at any time, please send us an email at info@opengift.io.

4. Security

Your account is protected by a password for your privacy and security. You need to prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-in mechanism appropriately and limiting access to your computer and browser by signing off after you have finished accessing your account.

The security of your Personal Information is important to use, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. In the event that we believe that the security of your Personal Information in our possession or control may have been compromised, we will notify you of that development as soon as possible, and, we will do so by the email associated with your account.

5. Access to, and Correction and Deletion of Personal Information

Through your user profile, you may access, correct, update, edit or delete your Personal Information at any time, or any of the information you provide to us.

If you are a European resident, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. If you would like to exercise this right, please contact us at info@opengift.io. Additionally, please note that your information will be transferred outside of Europe, including to Canada and the United States.

The information you can view, update, correct, and delete through your user profile may change as the Site changes. If you have any questions about viewing or updating information we have on file about you or if you need to exercise any right under the European Union's General Data Protection Regulation, please contact us at info@opengift.io.

6. Data Retention

We will keep your Personal Information only for as long as necessary to fulfill the purposes for which we are processing your Personal Information unless the law permits or requires us to retain it for a longer period.

7. What choices do I have?

- You can always opt not to disclose information, but keep in mind that some information may be needed to register with us, purchase tokens through AML/KYC checks or to take advantage of some of our special features.
- You may be able to add, update, or delete certain information as explained in Section 7 above. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.
- You may close your account via the settings menu. Please note that some information may remain in our private records after the closing of your account.
- If you do not wish to receive email or other mail from us, please email us at info@opengift.io. Please note that if you do not want to receive legal notices from us, such as this Privacy Policy, these legal notices will still govern your use of the Site, and you are responsible for reviewing such legal notices for changes.

8. Changes To This Privacy Policy

This Privacy Policy is effective as of (5/30/2018) and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgement of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our Site.

9. Contact Us

If you have any questions about this Privacy Policy, please contact us anytime at info@opengift.io. We will make every effort to resolve your concerns as quickly as possible.