

Privacy Policy

Introduction

Please note that we take the protection of your personal data very seriously. We treat your personal data confidentiality and according to the prevailing legal data protection regulations and this privacy policy (“Privacy Policy”).

This Privacy Policy tells you how Flexio Platform collects, uses, shares, and stores personal data for users of our websites, software, and services. It also tells you about your privacy rights and how the law protects you. This Privacy Policy applies to the websites, applications, products and services on or in which it is posted, linked, or referenced. IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY OR OUR TERMS OF USE, THEN PLEASE DO NOT USE ANY OF THE SERVICES.

If you provide personal data to us, you consent to the collection, use and disclosure of such personal data in accordance with this Privacy Policy. If you provide the personal data of another individual, it means that you have informed him/her of the purposes for which we require his/her personal data and he/she has consented to the collection, use and disclosure of his/her personal data in accordance with this Privacy Policy.

If you have any questions, or would like to exercise your privacy rights, please contact us at support@flexio.org

Information Collection, Use, and Sharing

We are the sole owners of the information we collect on our websites (flexio.org) and through the usage of our software. We only have access to/collect personal data that you voluntarily give us via email or other direct contact from you.

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect a variety of personal data about our customers and visitors when you provide it to us, or when you use our services. This personal data falls into these categories:

Information You Give Us

Personal data we may collect from you includes:

- *Identity Data includes title, first name, last name, username or similar identifier.*

- *Contact Data includes billing address, company address, email address, and telephone numbers.*
- *Financial Data includes payment card details.*
- *Transaction Data includes network transactions affiliated with your accounts.*
- *Feedback and Correspondence Data includes information you provide in your responses to surveys, when you participate in market research activities, report a problem with Service, receive customer support, or otherwise correspond with us.*
- *Usage Data includes information about how you use our website and services.*
- *Marketing and Communications Data includes your preferences in receiving direct marketing from us and your communication preferences.*

Information We Get From Others

We may get personal data about you from other third party sources and we may add this to personal data we get from your use of our websites, software, and services. Such personal data may include:

- *Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.*
- *Tracking Data includes information we or others collect about you from cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers.*

We may use cookies, local storage, or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. Users can control the use of cookies and local storage at the individual browser level.

We also use Google Analytics to help us offer you an optimized user experience. You can find more information about Google Analytics' use of your personal data here: <https://policies.google.com/privacy?hl=en>

Information We Will Never Collect

We will never ask you to share your private keys or wallet seed. Never trust anyone or any site that asks you to enter your private keys or wallet seed.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

What About Aggregated and Anonymized Data?

The term "personal data" does not include data which can't identify you. For example, we may create aggregated and anonymized data (such as statistical or demographic data for our own purpose) which will not directly or indirectly reveal your identity. We may also aggregate your personal data to calculate the percentage of users accessing a specific platform feature, to improve our services, to identify trends, develop new services, etc. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Consequences if We Cannot Collect Your Personal Data

We need your Personal Data to provide our services to you and/or perform our contractual obligations towards you. Without providing such personal data, we may not be able to provide you the services you are intending to receive.

Use of Personal Data

To Provide Services

We will use your personal data in the following ways:

- *To enable you to access and use our websites, products, and services.*
- *To provide and deliver products and services that you may request.*

- *To send information, including confirmations, technical notices, updates, security alerts, and support and administrative messages.*
- *To comply with law.*

We use your personal data as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal processes, such as to respond to subpoenas or requests from government authorities.

To Communicate With You

We use your personal data to communicate about promotions, upcoming events, and other news about products and services offered by us and our selected partners.

To Optimize Our Platforms and Services

In order to optimize your user experience, we may use your personal data to operate, maintain, and improve our platforms and services. We may also use your personal data to respond to your comments and questions regarding the services and to provide you and other users with general customer service.

With Your Consent

We may use or share your personal data with your consent, such as when you instruct us to take a specific action with respect to your personal data, or you opt in for marketing communications. However, please note that, generally, we do not rely on consent as a legal basis for processing your personal data and we may process your personal data without your knowledge or consent, in compliance with this Privacy Policy, where this is required or permitted by law.

Lawful Basis for Processing Personal Data

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

In processing your personal data in connection with the purposes set out in this Privacy Policy, we may rely on one or more of the following legal bases, depending on the circumstances:

- *we have obtained your explicit prior consent to the processing (this legal basis is only used exceptionally in relation to processing that is entirely*

voluntary – it is not used for processing that is necessary or obligatory in any way);

- *the processing is necessary in connection with any contractual relationship that you may enter into with us;*
- *the processing is required by applicable law;*
- *the processing is necessary to protect the vital interests of any individual;*
or
- *We have a legitimate interest in carrying out the processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.*

When we are involving third party processors into the performance of our services and contractual obligations and such involvement requires the sharing of personal data, we have entered with our third party processors into data processing agreements according to Art. The list of third party Processors to which we disclose your personal data can be requested by e-mail to : privacy@flexio.org

Sharing of Personal Data

We do not share, rent, or sell the personal data that you provide us with other organizations without your express consent, except as described in this Privacy Policy. We may disclose personal data to third parties without your consent under the following circumstances:

- *Business Transfers. We may share personal data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.*
- *Compliance with Laws and Law Enforcement; Protection and Safety. We may share personal data for legal, protection, and safety purposes or to comply with laws.*
- *Professional Advisors and Service Providers. We may share personal data with those who need it to do work for us. These recipients may include third party companies and individuals to administer and provide the Service on our behalf (such as customer support, hosting, email delivery and database management services), as well as lawyers, bankers, auditors, and insurers.*

- *Group.* We may share personal data with other companies in the Flexio group.
- *Marketing Activities.* In case you have consented to receiving information/newsletters from us, we may transfer your personal data to our business partners in order for us or our business partners to inform you about upcoming opportunities and promote our respective products and services.
- *Others .* You may permit us to share your personal data with other companies or entities of your choosing. Those uses will be subject to the privacy policies of the recipient entity or entities.

We may also share aggregated and/or anonymized data with others for their own uses.

Outside Links

This website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

Security

We take precautions to protect your personal data. When you submit sensitive personal data via the website, your personal data is protected both online and offline. Wherever we collect sensitive personal data (such as your contact information), that personal data is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for “https” at the beginning of the address of the Web page.

While we use encryption to protect sensitive personal data transmitted online, we also protect your personal data offline. Only employees who need the personal data to perform a specific job (for example, billing or customer service) are granted access to personal data. The computers/servers in which we store personal data are kept in a secure environment.

Retention of Personal Data

We retain personal data we collect as long as it is necessary and relevant to fulfill the purposes outlined in this Privacy Policy. Following that period, we will make sure it is deleted or anonymised (in which case we may use this information indefinitely without further notice to you). We may retain personal data for a longer period to comply with

applicable law where required, prevent fraud, resolve disputes (or if we believe there is a prospect of litigation/dispute in respect to our relationship with you), troubleshoot problems, assist with any investigation, enforce our Terms of Use, and other actions permitted by law.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your Access to and Control Over Your Personal Data

You may opt-out of any future contacts from us at any time. You can do the following at any time by contacting us via the contact form given on our website. You can also:

- *See what personal data we have about you if any – this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.*
- *Request change/correction to any personal data we have about you – this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.*
- *Request us to delete any personal data we have about you – this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.*
- *Object to processing of your personal data – where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.*

- *Request restriction of processing your personal data – this enables you to ask us to suspend the processing of your personal data in the following scenarios:*
 - *if you want us to establish the personal data's accuracy;*
 - *where our use of the data is unlawful but you do not want us to erase it;*
 - *where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; and*
 - *you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.*
- *Request transfer of your personal data to you or to a third party – we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.*
- *Right to withdraw consent at any time – in the rare circumstances where we ask for your consent to process your personal data, any consent is provided freely and if you decide to withdraw your consent, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.*

If you wish to exercise any of the rights set out above, please contact us at support@flexio.org

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Tracking Technologies Generally

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings.

Amendment to this Privacy Policy

We continually improve our methods of communication and adding new functionality and features to our platforms and services. As such, we keep our Privacy Policy under regular review and we may amend it. We encourage you to check this Privacy Policy frequently and anytime you submit personal data via our platform.