

PRIVACY POLICY

Last updated: October 20, 2020

1. Introduction

- 1.1. This privacy policy statement (the "**Privacy Policy**") defines how the personal data of the users of the website of Soveren, Inc., a company incorporated in Delaware (the "**Company**") is processed and what rights the users of the website **soveren.io** (collectively with all of its subdomains and all their respective pages, the "**Website**"), the online services at the Website ("**Services**"), or when you otherwise interact with us (the "**Users**") retain in relation to their personal data being in the possession of the Company.

2. Definitions

- 2.1. In the Privacy Policy, unless the context otherwise requires, the following terms shall have the following meanings:
 - 2.1.1. "**Users**" has the meaning ascribed to it in clause 1.1;
 - 2.1.2. "**Company Parties**" means Company and its respective past, present and future employees, officers, directors, contractors, consultants, attorneys, accountants, financial advisors, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns. "**Company Party**" means one of the foregoing, as the case may be.
 - 2.1.3. "**Controller**" means the natural person or legal person acting alone or jointly with others, who determines the purposes and means of the processing of personal data;
 - 2.1.4. "**Data**" means the information that is collected in relation to your use of the Website and the Services.
 - 2.1.5. "**Data subject**" means the natural person to whom the Personal data refer.
 - 2.1.6. "**Employees**" means the employees of the Company from time to time;
 - 2.1.7. "**Company**" has the meaning ascribed to it in clause 1.1;
 - 2.1.8. "**Personal data**" means any information relating to an identified or identifiable natural person;
 - 2.1.9. "**Privacy Policy**" has the meaning ascribed to it in clause 1.1;
 - 2.1.10. "**Processor**" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller; and
 - 2.1.11. "**Terms of Use of the Website**" means the document describing the terms of use of the Website available on the Website (as may be amended from time to time).

3. Data Controller

- 3.1. The Company is the data controller. The contact details of the Company are as follows:

Email: support@soveren.io

Address: 1811 Silverside Road, Wilmington, DE 19810

- 3.2. The Company treats data protection and privacy issues with utmost care. In addition the Company strives to apply such policies and mechanisms which ensure high standard of security. Appropriate electronic and procedural measures are used in order to make sure that the personal data being in the Company's possession are not accessible by any unauthorized person. The Employees are trained how to handle and process personal data strictly limited within the course of business, while the methods and electronic systems used for processing and sharing of personal data, where permitted, provide sufficient guarantees of protection.

4. Types of Personal Data Processed

- 4.1. In order to perform the Services and the functionality of the Website, we are entitled to ask you to provide Company Parties with your personal identification information, including but not limited to your name and e-mail.
- 4.2. The Personal data may be collected either directly by the Company or indirectly through intermediaries and other third parties acting on behalf of the Company, such as employees, agents or other service providers.
- 4.3. Company may collect the Data from you in a variety of ways and circumstances. Company Parties shall be entitled to combine Data collected in the course of your interaction with different sections of the Website or the Services with any other relevant available information.
- 4.4. Data collected by or transmitted to Company Parties, in the course of accessing, interaction and operation of the Website and provision of the Services may include, without limitation, the following Data:
 - 4.4.1. Internet Protocol (IP) address and location;
 - 4.4.2. cookie information;
 - 4.4.3. browser identification information;
 - 4.4.4. information on the computer or mobile device you use to access the Website and the Services, including the hardware model, operating system and version, your web browser, and device identifiers;
 - 4.4.5. information contained in or relating to any communication that you send to us or send through the Website, and metadata associated with the communication;
 - 4.4.6. date and time of accessing the Website and the Services;
 - 4.4.7. information of third parties websites referred the Website or the Services;

- 4.4.8. information related to your activity in the course of the Services use, including, without limitation, search queries history, search results provided to you in response to your query, web pages you visited by reference from the search results;
- 4.5. You may always refuse to supply Data, though this may prevent you from engaging in certain Website-related activities.

5. Purposes of Collecting and Processing

- 5.1. Company collects and process the Data as part of the operation of the Website and the Services, including, but not limited to, for the following purposes:
 - 5.1.1. administration and development of the Website and the Services;
 - 5.1.2. enhancement of user experience, including the provision of personalized Services and improvement of the Website and the Services;
 - 5.1.3. development of new products, utilities, and offerings;
 - 5.1.4. detection, investigation, and prevention of fraudulent transactions and other illegal activities and protection of your rights and rights of Company Parties;
 - 5.1.5. collection, processing and performing statistical and other research and analysis of information for enhancement of the Website and the Services;
 - 5.1.6. communication with you about products, services, promotions, events and other news and information we think will be of interest to you; and
 - 5.1.7. verifying compliance with the Terms of Use of the Website.
- 5.2. You hereby acknowledge and agree that Company Parties shall be entitled to use cookies and web beacons (pixel tags) to collect the Data and associate the Data with your computer and web browser.

Cookies only contain information sent to your computer by us — no private data can be selected in this way. If you accept the cookies on our site, we will be unable to access your personal information. We will, however, be able to identify your computer with the help of cookies. No personal data is stored in the cookies used. We are thus unable to draw any conclusions about your identity based on cookie technology.

We use «session-related» temporary cookies: these will not remain on your computer. If you leave our website, any temporary cookies will also be discarded. The gathered information helps us to analyze usage patterns and structures of our Website and to optimize our Website by improving content or personalization and by simplifying usage.

We also use «permanent» cookies: these will remain on your computer to facilitate personalization and registration services on your next visits.

«Permanent» cookies can be manually removed by the User. Such cookies delete themselves after a certain period of time.

Cookies are also used by some of our marketing partners (so-called third party cookies). These cookies help us tailor our site to the specific needs of our customers. By using these cookies, we obtain information about which products you have looked at or searched for, or which pages you have visited previously. These cookies are stored on your hard drive and delete themselves automatically after a certain period of time.

Most browsers (e.g. Firefox, Chrome, Internet Explorer, Safari, etc.) accept cookies by default. In the security settings, you may allow or reject temporary and permanently stored cookies independently of each other. However, we expressly point out that certain features on our website are not available to Users and that some websites may not be displayed correctly if cookies are deactivated.

The data stored in our cookies will not be linked to your personal data (name, country, etc.) without your explicit consent.

6. Potential recipients of Personal data

- 6.1. The Company may share the Personal data processed by the Company with the physical and legal persons listed below:
 - 6.1.1. in the context of provision of Services by the Company;
 - 6.1.2. employees who are properly informed about the provisions of the applicable data protection regulations and are bound by the confidentiality agreement executed with the Company;
 - 6.1.3. computer centers which provide outsourced IT and communication support, backup and other IT services with whom the Company has entered into confidentiality agreements while the Personal data shared are always encrypted;
 - 6.1.4. courts or tribunals, upon receipt of a court order or judicial or administrative order;
 - 6.1.5. governmental bodies and public authorities, including tax authorities, who have legitimate interest on such Personal data; and
 - 6.1.6. to any other person for which the Data subject has given his/her consent.

7. Legal basis for collection of Personal data

- 7.1. The Company processes the User's Personal data based on the below legal grounds:
 - 7.1.1. the Company obtains the written consent of the User. Such consent is required to be obtained when (i) the Company collects the Personal data for advertising and marketing purposes or (ii) for a purpose which is not related to the services provided to the User by the Company;

- 7.1.2. for the entry into/performance of the contractual obligations under a contract entered into between the Company and the Data subject regarding the provision of Services;
- 7.1.3. compliance by the Company with its legal obligations imposed by any applicable legislation; and
- 7.1.4. to pursue the legitimate interests of the Company, the Users and the Employees, provided that such legitimate interests shall not override the right of the Data subject.

8. Term of retention

- 8.1. The Company processes the Personal data only for such period which is necessary in relation to the purpose for which they are processed. The Users are entitled to have their Personal data collected by the Company erased and no longer processed where
 - (i) such Personal data are no longer necessary for the purpose they are collected or processed, (ii) the User's consent has been withdrawn or (iii) the User objects to the processing of the Personal data. Irrespective of the latter, the Company reserves its legal rights for further retention of the User's Personal data in order to comply with its obligations under the relevant provisions of the applicable laws.

9. Security of storage

- 9.1. The Company implemented specific organizational and technical mechanisms which ensure high level of security of the Personal data. The Company strives to use physical and electronic filing systems which provide for the protection of the Users' Personal data against unlicensed or unlawful processing, accidental loss, destruction or damage.
- 9.2. In addition to the security policy undertaken by the Company, the Data subjects are highly recommended to use only secured emails and secured networks when transmitting their Personal data to the Company.

10. Rights of the Data subjects

- 10.1. The Data subjects have certain rights, including among others:
 - 10.1.1. the right to be informed within one month from the receipt of the request by the Company, which is obliged to provide such information free of charge electronically, in a compatible, machine-readable form;
 - 10.1.2. the right of access to the Personal data, including the purpose of the processing, the categories of Personal data concerned, the recipients to whom the Personal data have been disclosed, the proposed period of retention of such Personal data;
 - 10.1.3. the right to rectification of inaccurate Personal data concerning the Data subject;

- 10.1.4. the right to erasure/"right to be forgotten";
- 10.1.5. the right to the restriction of processing;
- 10.1.6. the right to data portability under which the User is entitled to receive his/her Personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller;
- 10.1.7. to withdraw their consent where processing relies on consent; and
- 10.1.8. to lodge a complaint - complaints are lodged with the government authority responsible for monitoring the application of the data protection laws. Complaints can be lodged with the authority where a person's habitual place of residence or work is located, or with the authority where the place where an alleged infringement occurred.

11. Applicable Laws

- 11.1. The Privacy Policy shall be governed by and construed in accordance with the laws of Delaware, without regard to conflict of law rules or principles (whether of Delaware or any other jurisdiction) that would cause the application of the laws of any other jurisdiction.

12. Changes to the Privacy Policy

- 12.1. The Privacy Policy can be accessed in the Company's website. Any changes to the Privacy Policy will be announced to the Company's website and each User will be informed about the amended Privacy Policy by visiting the website periodically. Any updated version of the Privacy Policy will bear the relevant date of publication, in order to be clear which is the last modified version.

13. Contact

- 13.1. For any further information regarding the management of the Personal data, or if you wish to exercise your right of revocation or objection, please feel free to contact the Company at support@soveren.io