

Webacy Privacy Policy

We are committed to protecting our customers' personal information. We recognize the importance of protecting information that is stored on our network or servers. The data we protect (your "Personal Data") includes all information that can be used to identify you.

This Privacy Policy answers some questions about what personal information we collect and why, what we do with it, and how we protect it. This Privacy Policy is designed to address regulatory requirements of the jurisdictions in which Webacy offers its services, including the General Data Protection Regulation ("GDPR"), as enacted by the European Commission and the California Consumer Privacy Act ("CCPA").

If you have any concern, question or if you would like to exercise any of your rights with respect to your Personal Data, you may contact us at info@webacy.co.

What data do we collect about you and how do we collect it?

We collect your Personal Data through a variety of methods: either you provide it to us directly, we collect it from external sources, or we collect it by using automated means.

What personal information do we collect?

When you sign up for an account with us, or when you agree to allow us to provide personalized advisory services, we collect the following types of information: your name, address, date of birth, gender, place of citizenship, contact information of your "Inner Circle" ...type of browser and version you use, wallet identifier....

- Login information
- Device information
- Personal information (your name, e-mail address or phone number)
- Sensory Information, such as images and videos collected for identity verification, audio recordings left on answering machines;
- Social identity data (such as your group/company data, close connections, information on your referrals)
- Biometric Information, such as scans of your face geometry extracted from identity documents;
- Transactional data (information about payments made by or to you);
- Employment Information, such as job title, source of wealth;
- Technical data (internet connectivity data, internet protocol (IP) address, operator and carrier data, login data, browser type and version, device type, category and model, time zone setting and location data, language data, application version and SDK version, browser plug-in types and versions, operating system and platform, diagnostics data such as crash logs and any other data we collect for the purposes of measuring technical diagnostics, and other information stored on or available regarding the devices you allow us access to when you visit the Site, or use the services or the App); and

- Marketing and communications data (your preferences in receiving marketing from us or third parties, your communication preferences, your survey responses)

We also receive information from other sources and combine that with the information we collect through our services. For instance:

- We use "cookies" from time to time to help personalize your online experience with us. Cookies provide us with information about your use of the Sites that can help us improve the Sites and your experience with it. We will process Personal Data collected through cookies in accordance with this Privacy Policy. If you have set your browser to alert you before accepting cookies, you should receive an alert message with each cookie. You may refuse cookies by turning them off in your browser, however, you should be aware that our Sites, like most other popular sites, may not work well with cookies disabled.
- We may analyze public blockchain data to ensure parties utilizing our Services are not engaged in illegal or prohibited activity and to analyze transaction trends for research and development purposes.
- We use third-party services that may be co-branded as Webacy but will do so with clear notice. Any third-party services may collect information as determined by their own privacy policies.
- Advertising or analytics providers may provide us with anonymized information about you, including but not limited to, how you found our website.

On what basis do we collect your data?

We only use your Personal Data where we have a legal basis to do so:

- Consent: For some processing activities, we require your prior consent. This applies for example to some of our direct marketing activities which fall under the scope of the GDPR. You will always be prompted to take clear, affirmative action so that we can ensure that you agree with the processing of your Personal Data. If you have given us your consent for processing operations, you may always change your mind, and withdraw your consent at any time and easily; all you need to do is email us at info@webacy.co.
- Performance of a contract: Some Personal Data we process about you is for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract with us.
- Legal obligation: In some cases, we have to process your Personal Data to comply with legal obligations, including those applicable to financial services institutions, such as under the Bank Secrecy Act and other anti-money laundering laws. You may not be eligible for certain Services if we cannot collect the Personal Data necessary to meet our legal obligations.

For what purposes do we collect your data? We collect your Personal Data to:

- Provide our Services (including customer support);
- Process transactions and send notices about your transactions;
- Resolve disputes, collect fees, and troubleshoot problems;
- Communicate with you about our Services and business and to inform you of matters that are important for your account and/or use of the Sites. We also use your Personal Data to respond to any questions, comments or requests you filed with us and the handling of any complaints;
- Comply with applicable laws and regulations;
- Establish, exercise and defend legal claims;
- Monitor and report compliance issues;
- Customize, measure, and improve our business, the services, and the content and layout of our - Sites and apps (including developing new products and services; managing our communications; determining the effectiveness of our sales, marketing and advertising; analyzing and enhancing our products, services, websites and apps; ensuring the security of our networks and information systems; performing accounting, auditing, invoicing, reconciliation and collection activities; and improving and maintaining the quality of our customer services);
- Perform data analysis;
- Deliver targeted marketing, service update notices, and promotional offers based on your communication preferences, and measure the effectiveness of it. To approach you via email for marketing purposes, we request your consent, unless it is not required by law. You always have the option to unsubscribe from our mailings, e.g., via the unsubscribe link in our newsletter;
- Perform risk management, including comparing information for accuracy and verify it with third parties and protect against, identify and prevent fraud and other prohibited or illegal activity, claims and other liabilities; and
- Enforce our contractual terms.

How long do we keep your data?

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting obligations or to resolve disputes. While retention requirements vary by jurisdiction, information about our typical retention periods for different aspects of your personal information are described below.

If your subscription falls into inactive status, we will dispose of your data within 90 days. In some cases we may keep a hash of your e-mail address to prevent repeated usage of the free trial.

Information collected via technical means such as cookies, web page counters and other analytics tools is kept for a period of up to one year from expiry of the cookie.

When Personal Data is no longer necessary for the purpose for which it was collected, we will remove any details that identifies you or we will securely destroy the records, where

permissible. However, we may need to maintain records for a significant period of time (after you cease using a particular service) as mandated by regulation.

Children's Privacy

Webacy account holders must be at least 18 years old. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us at info@webacy.co. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

California Consumer Privacy Act

We take our responsibilities under the California Consumer Privacy Act ("CCPA") seriously. If you are a California resident, the following provisions apply to our processing of information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household subject to the CCPA. For such residents, the provisions of this CCPA portion of the Privacy Policy prevail over any conflicting provisions in the rest of the Privacy Notice.

California Personal Information We Collect We have collected the following categories of California Personal Information within the last 12 months: (1) identifiers (2) information under the California Customer Records statute (3) commercial information (4) internet or other similar network activity (5) geolocation data (6) inferences drawn from other personal information.

For each of these categories, we obtain California Personal Information from a variety of sources. These sources include: yourself, with respect to both online and offline interactions you may have with us or our service providers; other entities with whom you transact; others with whom you maintain relationships who may deal with us on your behalf; the devices you use to access our websites, mobile applications, and online services; identity verification and fraud prevention services; marketing and analytics providers; public databases; social media platforms; and others consistent with these CCPA provisions.

For each of these categories, we share Personal Information with a variety of third parties. These third parties include: other Webacy entities; service providers; marketing and advertising providers; analytics providers; law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other applicable legal process or requirement; and merchants in cases of suspected fraud or in connection with an ongoing investigation.

Use of California Personal Information For each of the above categories, we use the California Personal Information we collect for the business purposes disclosed herein. Please note that the business purposes for which we may use your information include:

- Audits and reporting relating to particular transactions and interactions, including online interactions, you may have with us or others on our behalf;

- Detecting and protecting against security incidents, and malicious, deceptive, fraudulent or illegal activity, and prosecuting the same;
- Debugging to identify and repair errors in our systems;
- Short-term, transient use including contextual customization of ads or website;
- Providing services on our behalf or on behalf of another, including maintaining or servicing accounts, providing customer service, fulfilling transactions, verifying identity information, processing payments, and other services;
- Conducting internal research to develop and demonstrate technology; and
- Conducting activity to verify, enhance, and maintain the quality or safety of services or devices which we may own, control, or provide.

We may also use the information we collect for our own or our service providers' other operational purposes, purposes for which we provide you additional notice, or for purposes compatible with the context in which the California Personal Information was collected.

Your California Rights If you are a California resident, you have certain rights related to your California Personal Information. You may exercise these rights free of charge except as otherwise permitted under applicable law. If you wish to submit a request under the CCPA, please do so by writing to info@webacy.co.

As required under applicable law, we may take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may require you to provide information to verify your identity in response to exercising requests of the above type, including name and account information. We may limit our response to your exercise of the below rights as permitted under applicable law.

Right to Access/Know You have the right to request that we disclose to you:

- the categories of California Personal Information we have collected about you
- the categories of sources from which the California Personal Information is collected;
- our business or commercial purpose for collecting or selling California Personal Information;
- the categories of third parties with whom we share California Personal Information; and
- the specific pieces of information we have collected about you.

To the extent that we sell your California Personal Information within the meaning of the California Consumer Privacy Act or disclose such information for a business purpose, you may request that we disclose to you:

- the categories of California Personal Information that we have collected about you;
- the categories of California Personal Information about you that we have sold within the meaning of the California Consumer Privacy Act and the categories of third parties to whom the California Personal Information was sold, by category or categories of personal information for each third party to whom the California personal information was sold; and

- the categories of California Personal Information about you that we disclosed for a business purpose.

Right to Delete You have the right to request that we delete personal information about you which we have collected from you. You contact us at info@webacy.co to request that that we delete your data.

Right to Opt-Out and Right to Opt-In You have the right to direct us to not sell your Personal Information at any time (the “right to opt-out”) by managing your cookie preferences by contacting us at info@webacy.co.

Non-Discrimination Subject to applicable law, we may not discriminate against you because of your exercise of any of the above rights, or any other rights under the California Consumer Privacy Act, including by:

- Denying you goods or services;
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Providing you a different level or quality of goods or services; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

GDPR:

Under the GDPR and relevant implementation acts, individuals have statutory rights related to their Personal Data. Please note that rights are not absolute and may be subject to conditions.

One key right is the Right to object. You have the right to object to processing of your Personal Data where we are relying on legitimate interests as our legal basis (see above). Under certain circumstances, we may have compelling legitimate grounds that allow us to continue processing your Personal Data. Insofar as the processing of your Personal Data takes place for direct marketing purposes, including profiling for direct marketing, we will always honor your request.

Other rights are as follows:

- Right to withdraw consent.
- Right of access.
- Right to rectification.
- Right to erasure. Right to restriction. You have the right to request restriction of processing of your Personal Data.
- Right to data portability. In some cases, you have the right to request to transfer your Personal Data to you or to a third party of your choice.

Data Protection Officer We have appointed a Data Protection Officer (“DPO”) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any

questions or complaints related to this Privacy Notice or our privacy practices, or if you want to exercise your legal rights, please contact our DPO at info@webacy.co.

Complaints

You have the right to make a complaint about the way we process your personal data to a supervisory authority. If you reside in an EEA Member State, you have the right to make a complaint about the way we process your personal data to the supervisory authority in the EEA Member State of your habitual residence, place of work or place of the alleged infringement. Information about your supervisory authority could be found [here](#).

Third-party links

The Webacy website and any applicable web browser, the Webacy App or application programming interface required to access the Services (“Applications”), may include links to third-party websites, plugins and applications (“Third-Party Sites”). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these Third-Party Sites and are not responsible for their privacy statements and policies. When you leave our Site or Applications, we encourage you to read the privacy notice or policy of every Third-Party Site you visit or use.

If you refuse to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you refuse to provide that data when requested, we may not be able to fulfill our duties - for example, to provide you services. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

Changes to this Notice We may amend this Notice at any time by posting a revised version on our website. The revised version will be effective at the time we post it. You are responsible for periodically reviewing this Notice.

Contact Information You may contact us with questions or concerns about our privacy policies or practices at info@webacy.co.