

Last updated: 03/2020

OUR COMMITMENT TO YOU

Thank you for showing interest in our site at <https://xion.app>, <https://xion.global>, Xion Wallet browser extension (collectively: "the Site") and the set-up of our payment protocol services ("the Services"). In order for us to provide you with our Services we are required to collect and process certain personal data about you and your activity. By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of this information. We encourage you to review the following information carefully.

GROUNDS FOR DATA COLLECTION

Processing of your personal information (meaning, any information which may potentially allow your identification with reasonable means; hereinafter "Personal Information") is necessary for the performance of our contractual obligations towards you and to provide you with our Services. When you use our Services, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

HOW DO WE RECEIVE INFORMATION ABOUT YOU?

We receive your Personal Information when you voluntarily provide us your personal details in order to create an account on our Xion Wallet (for example, your name, email address, shipping address, phone number).

WHAT TYPE OF INFORMATION WE COLLECT?

In order to provide you with our Services we may collect the following Personal Information:

- Your company/name, email address, shipping address, phone number
- Certain technical information that is automatically recorded when you access our Site or use our Services, such as your IP address, MAC address, device approximate location and other technical data. We may also record and collect data from or about your device (for example your computer or your mobile device) when you visit our Site or access the Service. This information is unidentified and thus deemed non-identifiable information that cannot be used to identify an individual. This "non-Personal Information" includes, but is not limited to: UDID, Google advertising ID, IDFA, cookie identifiers, and may include other identifiers such your operating system version, browser type, language preferences, time zone, referring domains and the duration of your visits. This will facilitate our ability to improve our service and personalize your experience with us. This information cannot be used to identify you. If we combine Personal Information with non-Personal Information about you, the combined information will be treated as Personal Information for as long as it remains combined.

COOKIES

When you use our Site, we may store cookies on your computer (as well as other tracking technologies like web beacons, pixels etc.) in order to facilitate and customize your use of our Site. A cookie is a small data text file which a website stores on your computer's hard drive (if your web browser permits) that can later be retrieved to identify you to us. Our cookies may store information regarding your registration to our newsletter of demo services. You are always free to decline our cookies if your browser permits, but such disabling may cause some of the features of our Site to not operate properly and your online experience may be limited. We also use a tool called "Google Analytics" to collect information about your use of the Site. Google Analytics collects information such as how often users access the Site, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Site and services. Google Analytics collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

HOW DO WE USE THE INFORMATION WE COLLECT?

- Provision of Services – we will use the Personal Information you provide us for the provision and improvement of our Services.
- Marketing purposes – we may use your Personal Information (such as your email address or phone number) for marketing purposes. For example, we may send you promotional material concerning our Services or our partners' services (which we believe may interest you). You may choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the "unsubscribe" link in the emails that you receive from us. Please note that even if you unsubscribe from our marketing materials, we may continue to send you service-related updates and notifications, or reply to your queries and feedback you provide us.
- Analytics, surveys and research - we are always trying to improve our Services and think of new and exciting features for our users. From time to time, we may conduct surveys or test features, and analyze the information we have to develop, evaluate and improve these features.
- Protecting our interests - we use your Personal Information when we believe it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect our rights and property, including our users and/or partners.
- Enforcing of policies – we may use your Personal Information in order to enforce our policies.

- Compliance with legal and regulatory requirements - we also use your Personal Information to investigate violations and prevent money laundering and perform due-diligence checks, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.

WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We do not rent, sell, or share your Personal information with third parties except as described in this Privacy Policy. We may share Personal Information with the following:

- Companies in our group - we share your information with companies in our group, as well as our employees, in order to provide you with our services.
- Sellers in Xion – we share your information with sellers/companies in Xion Global that you have purchased products/services from.
- Service providers - we share your information with business partners, such as storage providers and analytics providers who help us provide you with our service.
- Legal and regulatory entities - we may disclose any information in case we believe, in good faith, that such disclosure is necessary in order to enforce our Terms and Conditions, take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, protect the security or integrity of the site and our servers and protect our rights and property, including our users and/or partners. In any case where we conclude that disclosure of Personal Information is necessary, we will only disclose that portion of the Personal Information that is required in order to satisfy the basis for disclosure. We will share the Personal Information under appropriate safeguards.
- Merger and acquisitions – we may share your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your information in accordance with the terms of this Privacy Policy.

TRANSFER OF PERSONAL INFORMATION OUTSIDE THE EEA

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Information. Your Personal Information is stored on secure servers and is not publicly available. We limit access of your Personal Information only to those employees or partners that need to know the Personal Information in order to achieve the purposes of processing, as described above.

You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account (for example, by logging out after you have finished accessing your account). You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use. While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. However, we do not store any passwords as an added layer of security.

You should be aware that there is always some risk involved in transmitting information over the internet. While we strive to protect your Personal Information, we cannot ensure or warrant the security and privacy of your personal Information or other content you transmit using the service, and you do so at your own risk.

Please note that we cannot control, nor will we be responsible for the Personal Information collected and processed by third parties, its safekeeping or a breach thereof, or any other act or omission pertaining to it and their compliance with applicable privacy laws or regulations. We advise you to read the respective privacy policy of any such third party and use your best discretion.

RETENTION

We will retain your Personal Information for as long as necessary to provide our services, and as necessary to comply with our legal obligations (including those specific to financial transactions), resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

YOUR RIGHTS

Any user has the right to download and erase all of their data stored in our database. If you reside in the EU, you may request to: a. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information. b. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format. c. Request rectification of your personal information that is in our control. d. Request erasure of your personal information. e. Object to the processing of personal information by us. f. Request to restrict processing of your personal information by us. g. Lodge a complaint with a supervisory authority. However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

UPDATES TO THIS POLICY

This Privacy Policy is subject to changes from time to time, in our sole discretion. The most current version will always be posted on our website (as reflected in the "Last Updated" heading). You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our services after any revisions become effective, you agree to be bound by the updated Privacy Policy.

HOW TO CONTACT US?

If you wish to exercise any of the aforementioned rights, or receive more information, please contact using the details provided below: contact@xion.global