



## 1. INTRODUCTION

Flinter ("Flinter" or "we") are committed to protecting and respecting your privacy. We are equally committed to ensuring that all our employees, service providers and agents uphold these obligations.

This Privacy Policy (together with our Terms of Use and any other documents referred to on it) sets out the basis on which any personal data we collect from users of the Website at flinter.io or that you provide to us by email, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This policy governs your use of our products, services, content, features, technologies or functions offered by Flinter (including data you provide to Flinter in connection with the same) and all related sites, applications, and services (collectively, the "Flinter Services").

You accept and consent to this Privacy Policy when you sign up for, access, or use the Flinter Services. By accepting and consenting to this Privacy Policy, you expressly consent to our use and disclosure of your personal data in the manner described in this policy.

## 2. INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

(a) Information you give us. This is information about you that you give us by filling in forms on our site Flinter.io (the "Website") or by corresponding with us by email or otherwise. It includes information you provide when you register to use the Website, when you order products from us, subscribe to our service, when you submit a query or request from us, when you fill in forms on the Website, when you respond to a survey and when you report a problem with the Website. The information you give us may include your name, address, email address, phone number, financial and credit card information, currency preference, personal description and photograph, images of your government issued ID and/or passport and utility bills, statements or other documents you may submit as a proof of your address, any other information or documents in relation to your identity, the source of your wealth, the source of funds used for the purposes of acquiring DEC tokens and any other documents or data from which you can be identified.

(b) Information we collect about you. With regard to each of your visits to the Website we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet;
- your login information;
- browser type and version;
- time zone setting;
- browser plug-in types and versions;
- operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL);
- clickstream to, through and from the Website (including date and time);
- length of visits;
- page interaction information (such as scrolling, clicks, and mouse-overs); and
- methods used to browse away from the page;



If you register with the Website, we may also collect and hold certain personal data about you, including:

- information about your identity, such as your name and date of birth;
- contact information, such as your postal address, email address and telephone numbers;
- blockchain identifiers, such as blockchain addresses and public keys;
- usernames and passwords which you create when registering for an account with us;
- records of our communications with you, including any messages you send us;
- identity verification information, such as images of your passport, government issued ID card, national ID card, utility bill or driver's license;
- information about any of our products or services we provide you; and
- details about how to use the products and services we provide.

(c) Information we receive from other sources. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information. Without this information, we may not be able to provide you with our products and/or services to respond to queries or requests that you submit to us and protect against the risks of cybercrime, fraud and money laundering and terrorist financing.

### 3. COOKIES

The Website uses cookies to distinguish you from other users of the Website. This helps us to provide you with a good experience when you browse the Website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy within this section of the web site.

#### USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- Information you give to us.  
We will use this information to:
  - carry out our legal and regulatory obligations;
  - provide you with information about the products and services that you request from us;
  - enable us to offer you our products and services;
  - verify your identity (including age) when you are dealing with us to determine your eligibility for any of our products and services;
  - comply with our legal and regulatory obligations;
  - answer your queries and requests;
  - carry out market analysis and research;
  - notify you about changes to our service; and
  - ensure that content from the Website is presented in the most effective manner for you and for your computer.
- Information we collect about you.  
We will use this information to:
  - administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;



- improve our products and services and improve the Website to ensure that content is presented in the most effective manner for you and for your computer;
- allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep the Website safe and secure;
- monitor the use of our products and services;
- manage and resolve any legal and commercial complaints and/or issues; and
- keep you informed about our latest activities, including the sending out of newsletters.
- Information we receive from other sources. We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### **4. MARKETING CONDUCTED BY Flinter**

We may from time to time use your personal data so that we can send you marketing materials about products or services provided by Flinter that we think you may be interested in but we shall always give you the opportunity to easily opt-out of any such communications. You can opt-out of receiving marketing communications from us by contacting us at [info@flinter.io](mailto:info@flinter.io) or, in respect of emails, by clicking unsubscribe on the relevant email.

With your specific consent we may also provide you with information about products and services that are provided by third parties. We shall not use your personal data for marketing third party products and services unless we have received your consent.

We may use your personal data to market the following products and/or services to you:

- information on proposed new digital assets;
- creating, purchasing and/or trading digital assets;
- software and hardware wallets for holding digital assets; and
- other products or services related to buying, selling, storing and trading digital assets.

If we use your personal data in any direct marketing communications, you have the right to request that we supply you with the source of that personal data. There is no fee for requesting this information. We will provide you with the source of the personal data, unless it is impracticable or unreasonable to do so.

We may also use and disclose your details for other purposes in accordance with your requests including as required to provide the services you have requested.

#### **5. DISCLOSURE OF YOUR INFORMATION**

By voluntarily providing us with personal data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide personal data to us, you acknowledge and agree that we have the right to share your personal information with:

(a) Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

(b) Our staff who require the information to discharge their duties.

(c) Selected third parties including:



- identity verification agents;
- fraud and crime prevention agencies and organizations;
- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- analytics and search engine providers that assist us in the improvement and optimization of the Website;
- professional advisors who we engage to provide advice to our business; and
- government authorities, crime investigation agencies, courts and others who ask us for disclosure as required by law or court order.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Flinter or substantially all of its assets are acquired by a third party, in which case personal data held by us about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of Flinter, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit reduction.

## 6. WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Our third party service providers are contractually bound to protect and use your personal data solely for the purposes for which it was disclosed, except as otherwise required or permitted by law. We ensure that such third parties will be bound by terms no less protective than those described in this Privacy Policy and as permitted under European data protection law and other applicable laws.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We use reasonable physical, electronic and procedural safeguards to protect the personal information that we obtain from you from loss, misuse and unauthorized access, disclosure, alteration and getting destroyed. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.



## 7. RETAINING PERSONAL DATA

Your personal data will only be kept in our records for as long as required to meet our legal obligations and not longer than necessary.

For the most part, we will retain your personal data for up to 6 years. In some cases, we may be obliged to retain some of your personal data for longer periods as required by law. At our discretion, we may retain personal data for any period we consider reasonably necessary to do so in order to meet our legal obligations.

## 8. YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [info@flinter.io](mailto:info@flinter.io)

The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 9. ACCESS TO INFORMATION

If you want to access any of the personal data that we hold about you or to correct some aspect of it (for example, because you deem it to be incorrect or incomplete), please contact our data protection officer: [info@flinter.io](mailto:info@flinter.io)

To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. In particular cases we may charge you an administration fee for supplying you with access to the information you have asked for, but we will inform you of this before proceeding. There may be cases where we are not able to supply the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases, we will let you know why we cannot comply with your request.

Even if you do not request access to and/or correct your personal data held by us, if we are satisfied that, having regard to the reasons for which we hold your personal data that personal data is inaccurate, incomplete, outdated, irrelevant or misleading, we may take the necessary steps to correct that information.

## 10. CONSENT

By using the Website and the Flinter Services, you agree that you consent to this Privacy Policy, as updated from time to time and, if you have provided personal data, to us relating to any other person, you:

- have a right to provide that information;
- have provided a copy of this privacy policy, as updated from time to time, to that person; and
- each of these persons have agreed to those terms.



## **11. CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our Privacy Policy in the future will be posted on this page by revising the date at the top of the policy and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **12. COMPLAINTS**

We try to meet the highest standards in order to protect your privacy. Nevertheless, if you are concerned about the way in which we are managing your personal data and think we may have breached any applicable privacy laws, or any other relevant obligation, please contact our data protection officer using the contact details set out below. We will make a record of your complaint and refer it to our internal complaint resolution department for further investigation. We will deal with the matter as soon as we can and keep you informed of the progress of our investigation.

## **13. CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@flinter.io](mailto:info@flinter.io)