

## Privacy Policy

*Last updated: 30 March 2018*

### 1. Introduction

**Monetha GmbH**, registration number CHE-368.970.077, legal address, Baarerstrasse 10, 6302 Zug, Switzerland, provides a Decentralized Reusable Identity System to users to initiate and execute personal data transfers in a secure manner to the third parties (the “**Mobile App**”, or the “**Monetha’s platform**”, or the “**platform**”).

When this Policy mentions “**Monetha**”, “**we**,” “**us**”, or “**our**”, it refers to Monetha GmbH that is responsible for your information under this Privacy Policy (the “**Data Controller**”). At Monetha, the privacy and security of our Users is of paramount importance. Monetha is committed to protecting the data you share with us.

This Privacy Policy (“**Policy**”) explains how Monetha processes information that can be used to directly or indirectly identify an individual (“**Personal Data**”) collected through registration to and use of our Mobile App.

For the purposes of this Policy, Monetha defines the term “**User**”, or “**you**”, as any individual user of Monetha Mobile App.

### 2. General principles. Security

Monetha shall process all Personal Data adhering to the general data processing principles:

- lawfully, fairly and in a transparent manner in relation to the data subject (lawfulness, fairness and transparency);
- collect and process Personal Data only for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (purpose limitation);
- ensure that Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation);
- ensure that Personal Data is accurate and, where necessary, kept up to date (accuracy);
- ensure that Personal Data is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (storage limitation);
- process Personal Data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality).

*How we treat your Personal Data? How secure is your Personal Data?*

If you have an App account with us, we may display your profile name, profile photo, information you upload and actions you take on App account or on third-party applications connected to your App account (such as activities on other e-commerce platforms, reviews you write, comments you post, profile exchanges you perform).

We will respect the choices you make to limit sharing or visibility settings in your App account.

All and any information stored on Monetha’s platform is treated as strictly confidential. All information is encrypted and stored securely. Monetha implements and maintains appropriate technical, security and organisational measures to protect your Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

### 3. Collection and use

#### 3.1.General

In order to provide Mobile Apps and related services to you, Monetha collects various types of your Personal Data.

Your Personal Data is collected and used during 3 principal steps: registration, personal profile and the use of our platform (Mobile App).

**Before moving forward please read this carefully.** The essence of the Mobile app requires our users to have only one account, regardless of time. The User ensures that he would not delete his User account and would not create a new user account (if this happens, the User will contact our support and inform about his intention to sign up repeatedly to the Mobile app and will provide the information we ask, which is needed to repeatedly sign up). The User grants us permission to block his account without prior written notice in case our Platform identifies the user who signed up repeatedly after the deactivation of his account. We reserve the right not to make any explanations about the decision to block the user account. The user understands and accepts with mentioned conditions and waives any legal claims regarding the mentioned clause.

### **3.2. Processing of User registration data**

During your sign-up and registration on our Mobile App, you provide us with your Personal Data such as: email, username. Provision of this Personal Data is compulsory and mandatory for your App Account to be activated. Failing to provide any of this data or decision to delete or object to the processing of any of such data will result in de-activation of your App Account, as described in more detail in the Clause 5 hereof below.

You may sign-up to the Mobile App by filling in the Mobile App sign-up form. Each User is only permitted to create **one account** with the Monetha platform for the whole lifetime of the Mobile App.

This personal identification information is processed by Monetha for the purposes of User identification as well as App account activation. Additionally, this information may be used to provide Users with support, letting them know about upcoming changes or improvements, providing information regarding changes of any terms or conditions (including changes to this Policy) as well as other important information.

Monetha processes User registration data on the legal basis of:

- Your consent, expressed when voluntarily submitting and filling your Personal Data details in our registration form; and
- Conclusion and performance of contractual arrangements and obligations between Monetha and the User;
- Pursuance of legitimate interests of Monetha, as controller and manager of Mobile App platform.

Please note that you will only be able to delete your contact details and other User registration data by de-activation of your App Account, as described in more detail in the Clause 5 hereof below.

### **3.4. Processing of data, generated while using our Mobile App**

To ensure our platform's functionality, provide quality user experience and help you to build a richer Profile, we collect and process various Personal Data when our Mobile App is installed and used.

#### *Regular Personal Data*

Monetha app processes the following information to ensure the functionality of our platform and to provide further updates and improvements:

- **User device ID** (we collect device-specific information (such as your hardware model, operating system version, unique device identifiers) (to ensure that no strange or unusual devices are connected to our system);
- **Camera/gallery data** (allows scanning QR codes);
- **History and information on your profile exchange** (description of the Company you exchange data with, time and location);
- **Log information** (when you use our platform, we automatically collect and store certain information

in server logs. This includes details of how you used our Mobile App, IP address, device event information, such as crashes, system activity, hardware settings);

- **Your behaviour in our Mobile App** (your clicks, visited sections on our Mobile App);
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- **Records of feedback** (when you contact us, we keep a record of your communication to help solve any issues you might be facing);
- **Cookies and similar technologies** (we and our partners use various technologies to collect and store information when you visit our service, and this may include using cookies or similar technologies to identify your browser or device);
- **Location data** (we use various technologies to determine location, including IP address, GPS and other sensors that may, for example, provide us with information on nearby devices, Wi-Fi access points and mobile towers).

**NOTE: Please be aware that you should decide what type of information you are willing to share with the Company during the data exchange.**

Information we collect when you are signed in to our Mobile App, in addition to information we obtain about you from partners, may be associated with your App account. We may associate any of the above-collected or generated information with your App account.

Monetha processes this Personal Data on the following legal basis:

- (a) Conclusion and performance of contractual arrangements and obligations between Monetha and the User;

#### *Right to object*

In case you object to collection of additionally enabled data, you may withdraw your consent. However, you will gain potentially smaller benefits when exchanging data with the Companies.

### **3.5. Data Exchange**

When creating an account at our Mobile App, we request you to indicate whether you wish to receive notifications regarding data exchanges in your App account. We use provided contact details and your preferences for direct marketing by sending various offers or newsletters.

These direct marketing offers, depending on your preferences, may be personalized taking into account any other information which you have provided to us (e.g. location, social media profile information, purchase history etc.) or we have collected or generated from other sources as described below.

You can also directly share your Profile with the Companies who are using Monetha platform in exchange for benefits, discounts and paybacks which are to be visible in the Dashboard in your application.

Your Profile is exchanged only with your direct consent and you will always be notified what data is requested by the Company. Your profile data is never exchanged without your consent.

#### *Right to object*

If a User wishes to change their preferences and withdraw the consent for direct marketing, they may exercise such option at any time they wish by following the instructions to unsubscribe in the received email, or change their options in the settings of the App account.

Specifically, you may also choose to withdraw your specific consent for using your profile and other automated systems-analysed-data for direct marketing purposes.

### **3.7. Other uses of your Personal Data**

### *3.7.1. Developing the platform*

We use data, including public feedback, to conduct research and development for the further development of our platform in order to provide you and others with a better, more intuitive and personalized experience, drive membership growth.

### *3.7.2. Customer support*

We use data to help you and fix problems. We use the data (which can include your communications) to investigate, respond to and resolve complaints and issues (e.g., bugs).

### *3.7.3. Aggregate insights*

We use data to generate aggregate insights. We use your data to produce and share aggregated insights that do not identify you.

### *3.7.4. Security and investigations*

We use data for security, fraud prevention and investigations. We use your data (including your communications) if we think it's necessary for security purposes or to investigate possible fraud or other violations of our Terms of Services or this Policy and/or attempts to harm our Users.

## **4. Sources of Personal Data**

We collect and receive your Personal data from yourself (including your device) as well as from the following sources:

- Third-party service providers and our partners;
- Public sources;
- Other legal sources.

## **5. Retention and deletion**

Monetha will not retain data longer than is necessary to fulfil the purposes for which it was collected or as required by applicable laws or regulations.

### *5.1. Retention of unique User identifier as well as other data after de-activation of Mobile App*

In case you choose to deactivate App Account and require deletion of all the App account data (by invoking your rights as specified in Clause 7 hereof below), after the end of the retention periods, specified in Clause 5.3 below hereof:

- your contact details and data provided during registration, shall be deleted;
- other data in the Account (including data specified in Clause 3.4.) shall become depersonalised data (*i.e.*, delinked from any identifiable User) ("**Depersonalised Data**").

After de-activation of your Account Monetha will retain **a unique User identifier** (which shall be generated and composed as hash code from finite number of identification data, which you have provided to us during registration and verification steps with our App) for as long as Mobile App is in use and operation by Monetha or its legal successors. We will not be able to reverse engineer the said hash code to link or generate any personally identifiable data about you.

The said hashcode will be kept in the secure manner to prevent any link with the Depersonalised Data.

The above retention is needed for trustworthy and reliable functioning of our decentralized trust system and prevention of creation of parallel, new or fake App accounts.

### *5.2. Re-registration with the App*

At any time after de-activation of their Account, Users will be free to re-register with the App and open the App Account.

### 5.3. Retention of other data after de-activation of Mobile App

After deactivation of Mobile App Account Monetha will retain the following personal data for the following duration:

- User identification data – 1 (one) month after deactivation of your account;
- data generated while using our Mobile App (pursuant to Clause 3.4.) – 3 (three) months after deactivation of your account;
- Verification Confirmation Data – 1 (one) month after deactivation of your account;

We will further retain your personal data even after you have de-activated and closed your Account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce the Terms of Services. Specifically, we will continue storing your consents provided to us during registration and use of our App as long as this will be necessary to defend our rights, resolve disputes and meet applicable regulatory requirements.

Neither Monetha, nor other Users or any third parties will be able to see the profile of a deactivated App account. Except situations where User Account shared data with other Users without expiration or until expiration period of the data transfer request will be complete.

## 6. Data transfers and use of third party services

While collecting and processing your Personal Data, only you may perform data transfers to various third parties.

### 6.1. With your consent

We will share your Personal Data with companies, organisations or individuals outside our group of companies when we have your consent to do so.

### 6.2. Data processors

We process Personal Data on our servers in many countries around the world. We may process your Personal Data on a server located outside the country where you live.

We use various services provided by various service providers (“data processors”). Such services include IT infrastructure services, data centre services, cloud storage and other cloud services, analytical services, software services, identity verification services, mailing, targeting, newsletter services.

Some of these processors (e.g. *Google, Amazon, social networks*) are established outside EEA, however, we only use the services of those data processors which ensure safeguards and use technical and organisational security measures equivalent to the ones required by EU General Data Protection Regulation.

### 6.3. Our Legal Obligation to Use or Disclose Personal Data

We will reveal your Profile Data to state and public authorities without your prior permission only when we are legally required to provide information, including taking legal action to defend our rights, as well as the cases, where we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable law, regulation, legal process or enforceable governmental request, enforce applicable Terms of Services, including investigation of potential violations, detect, prevent or otherwise address fraud, security or technical issues.

### 6.4. Other

We provide your Personal Data to our affiliates, other group companies (first of all, MTH Tech, UAB, private limited liability company, organised under the laws of the Republic of Lithuania, code 303133083, legal address at Upes pr. 9, LT-09308 Vilnius, the Republic of Lithuania) or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Policy and any other appropriate confidentiality and security measures.

We may share non-personally identifiable information publicly as well as with our partners – publishers, advertisers. For example, we may share information publicly to show trends about the general use of our platform.

If we are involved in a merger, reorganisation, acquisition or sale, we will continue to ensure the confidentiality of any Personal Data and give all affected Users appropriate notices.

## **7. Your rights**

You are entitled to a range of rights regarding the protection of your Personal Data. Those rights are:

- the right to access information we process about you;
- the right to rectify incorrect / inaccurate information about you;
- the right to transfer all or part of the information collected about you to you or another data controller, where technically feasible (the right to data portability; with limitations and restrictions as specified in the EU General Data Protection Regulation);
- the right to erase any data concerning you. Users may demand erasure of data without undue delay for legitimate reasons, e.g. where data is no longer necessary for the purposes it was collected, or where the data has been unlawfully processed;
- the right to restriction of data processing. Users, for legitimate purposes, may obtain restriction of data processing from the controller;
- the right to object to processing of Personal Data when processing is carried out on the basis of legitimate interest, as well as in these cases, as specified above in this Policy:
  - a. use of your Personal Data for direct marketing purposes;
  - b. use of your Personal Data for profiling for direct marketing purposes;
  - c. use of additionally enabled data for verification purposes;
  - d. use of additionally enabled data generated while using our Mobile App.

To exercise any of the rights mentioned above, please contact our Data Protection Officer as indicated below.

Some of the rights as above are easy to exercise: i.e., you may at any time access and edit, update or amend your details by logging into your App account.

Users have the right to lodge a complaint to the national Data Protection Agency in their country of residence in the event where their rights may have been infringed. However, we recommend attempting to reach a peaceful resolution of possible dispute by contacting us first.

## **8. Acceptance of this Policy**

We assume that all Users of our Mobile App have carefully read this document and agree to its contents. If someone does not agree with this Policy, they should refrain from using our website and platform. We reserve the right to change our Policy as necessity dictates (see clause 11). Continued use of Monetha's website and platform implies acceptance of the revised Policy.

This Policy is an integral part of Monetha's Terms of Services.

We will ask for your consent before using information for a purpose other than those set out in this Policy.

## **9. Monetha's Data Protection Officer**

Monetha considers appointing a Data Protection Officer, who will be responsible for matters relating to privacy and data protection. In the meantime, please address all your requests or comments to team@monetha.io.

#### **10. Application of Policy**

Our Policy applies to all of the services offered by us and our affiliates, including MTH Tech, UAB, private limited liability company, organised under the laws of the Republic of Lithuania, code 303133083, legal address at Upes 9, LT-09308 Vilnius, the Republic of Lithuania, but excludes services that have separate privacy policies that do not incorporate this Policy.

Our Policy **does not apply** to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include our services or other sites linked from our services.

#### **11. Changes**

Our Policy may change from time to time. We will post any Policy changes on the App account and, if the changes are significant, we will provide a more explicit notice (including, for certain services, email notification of Policy changes).

#### **12. Further Information**

If you have any further questions regarding the data Monetha collects, or how we use it, then please feel free to contact the Data Protection Officer at the details as indicated above hereof.