

CELERX

PRIVACY POLICY

Updated November 20, 2019

This Privacy Policy Statement (“**Privacy Policy**”) is applicable to anyone who downloads CelerX or any other application connecting to this Privacy Policy (collectively, the “**Application**”), accesses the Site, utilizes the CelerX SDK, or otherwise uses our Services. This Privacy Policy does not cover any interaction you may have with Celer by telephone, postal mail, or other offline communications.

Any capitalized terms not defined herein shall have the meaning set forth in the Celer User Terms and Conditions of Service located at <https://celer.network> (the “**Terms**”).

NOTICE

Celer respects your privacy and is committed to protecting personal information that you provide in connection with your use of the Services. This Privacy Policy is intended to provide you notice of the Company’s information practices, including the types of information gathered, how information is used and safeguarded, and how you may control the maintenance and sharing of your information.

BY DOWNLOADING THE APPLICATION AND USING THE SERVICES, YOU CONSENT TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND TO OUR PROCESSING OF PERSONAL INFORMATION FOR THE PURPOSES STATED BELOW. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY, PLEASE DO NOT DOWNLOAD THE APPLICATION AND DO NOT USE THE SERVICES.

COLLECTION OF PERSONAL INFORMATION AND OTHER DATA

When you access or use the Services, we collect the following information:

Information You Give Us: You may give us information about you such as your name, email address, phone number, payment card information (including CVC or expiration date), or banking information by creating an Account, filling in forms on our Site or through our Application, or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use the Services and when you report a problem with the Site or with our Application.

Information We Collect About You: With regard to each of your visits to our Site or our Application we automatically collect the following information:

Login Information: We log technical information about your use of the Services, including the type of browser and version you use, last access time of your Wallet, the Internet Protocol (IP) address used to create the wallet and the most recent IP address used to access the wallet.

Device and Analytical Information: We automatically collect certain aggregate information and analytical data related to your Application usage. Aggregate information is non-personally identifiable or anonymous information about you, including the date and time of your visit, the phone network associated with your mobile device, your mobile device’s operating system or platform, the type of mobile device you use, your mobile device’s unique device ID and the features of our Application which you accessed.

Wallet Information: If you create a Wallet through our Services, you may choose to generate a public and private key pair. When generating the wallet or using the Services, you may elect to use our software to upload an encrypted file to a cloud storage account controlled by you, that, if unencrypted, would contain these keys, along with your transaction history. Under no

circumstances do we ever collect an unencrypted private key from you, nor can we decrypt any wallet file data, and in no event shall Celer ask you to share this information.

Information We Collect from Other Sources: We also receive information from other sources and combine that with information we collect through our Services. For instance:

Third-Party Services: We may collect additional information such as demographic and statistical information from third parties and sources other than the Services for which you have approved our access, but will do so with clear notice, or you may access third-party services in connection with your use of the Services. Any third-party services may collect information as determined by their own privacy policies and you should be careful to review their policies prior to using such services.

Cookies: We also use "cookies" from time to time to help personalize your online experience with us. Cookies provide us with information about your use of the site that can help us improve the site and your experience with it. We will process personal information collected through cookies in accordance with this Privacy Policy. If you have set your browser to warn you before accepting cookies, you should receive a warning message with each cookie. You may refuse cookies by turning them off in your browser, however, you should be aware that our site may not work well with cookies disabled.

USE OF INFORMATION COLLECTED

We have set out below, a description of all the ways we plan to use your personal information. We note that unless otherwise stated, we rely on the legal basis of legitimate interest to process your personal information:

- We use your personal information to operate, maintain, and improve the Services, the Site, Application, and other products.
- We use your personal information to create and manage your Account, including communicating with you regarding your Account.
- We use your personal information to send information including on-chain network confirmations, technical notices, updates, security alerts, and support and administrative messages.
- With your consent, we use your personal information to communicate about promotions, upcoming events, and other news, including news about products and services offered by us and our selected partners.
- With your consent, we may use your personal information to link or combine user information with other personal information as part of our process to verify and authenticate your identity as required by applicable law.
- We use your personal information to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity. In the event a subpoena seeks information about an identified user or limited group of users, we'll make reasonable business efforts to contact the user(s) before providing information to the party that requests it. We cannot guarantee that we will be able to contact the user(s) in all cases, whether because of a time limit, court order, inability to effectively contact a user, or for any other reason.
- We use your personal information to conduct security investigations and risk assessments.
- We use your personal information as described in the "Sharing of your Personal Information" section below.

Except as set forth herein, Celer does not sell, rent, or otherwise disclose personal information collected from and about its users to third parties.

SHARING OF PERSONAL INFORMATION

We may share personal information as follows:

- We may share personal information with your express consent.
- We may share personal information when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- We may share personal information for legal, protection, compliance and safety purposes.
 - We may share information to comply with applicable laws.
 - We may share information to respond to law enforcement, officials, regulatory agencies and other lawful requests, subpoenas and legal processes.
 - We may share information to protect the rights and property of Celer, our agents, customers, and others. This includes enforcing our Terms, agreements, or other policies.
 - We may share information in an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.
- We may share your information with certain service providers to help provide the Services, including certain third-party identity verification partners and our partners for processing any payments. In the event of payment processing, the transmission of your payment information is automatic, and at no point do we, or any of our agents or employees, have the ability to review, access or retain such payment information. For more information on how your payment information is processed, please see the terms and conditions and privacy policies of our third-party service providers below:
 - Stripe: <https://stripe.com/legal>
 - Paypal: <https://www.paypal.com/us/webapps/mpp/ua/legalhub-full>
 - Apple Pay: <https://www.apple.com/privacy/>

USE OF CACHE DATA

A cache is a component of your mobile device that transparently stores data for record-keeping purposes. Cache data does not identify users but does identify your mobile device. Most browsers and applications are initially set up to accept such data. If you prefer, you can program your mobile device so that it does not store this information while utilizing the Application. Certain Application features may only be available through the collection of such data. We may use such data to assist in data collection and to track Application usage and trends to help us better serve you. We also permit third parties who have entered into confidentiality agreements to access such data to help us monitor use of the Application for fraud or any other activity that does not comply with applicable laws.

Some of our business partners (e.g., analytical tracking software providers) use cookies and tracking technologies on the Application. We have no access to or control over these cookies or tracking technologies. This Privacy Policy covers the use of cookies and cache data on the Application and by us only and does not cover the use of cookies or tracking technologies by any such business partner.

LEGAL BASIS FOR PROCESSING IN THE EEA AND SWITZERLAND

If you are a resident of the European Economic Area (“**EEA**”) or Switzerland, you may have additional rights under the EU General Data Protection Regulation (the “**GDPR**”) with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “**Personal Data**” generally means information that can be used to individually identify a person, and

“*processing*” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure.

The purposes for which we process your Personal Data are:

- **Contractual Necessity:** Where we need to perform the contract we are about to enter into or have entered into with you for the Services;
- **Legitimate Interest:** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- **Legal Requirements:** Where we need to comply with a legal or regulatory obligation in the EEA or Switzerland; and
- **Consent:** Where you expressly grant us consent at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. Please contact info@celer.network if you need details about the specific legal basis we are relying on to process your Personal Data where more than one legal basis has been set out.

Celer is the responsible data controller for the purposes of EEA data protection laws.

Your rights in respect of your personal information if you are resident in the EEA and Switzerland:

If you are located in the EEA or Switzerland, you have the following rights in respect of your Personal Data that we hold:

- a. **Right of access.** The right to obtain access to your Personal Data.
- b. **Right to rectification.** The right to obtain rectification of your Personal Data without undue delay where that Personal Data is inaccurate or incomplete.
- c. **Right to erasure.** The right to obtain the erasure of your Personal Data without undue delay in certain circumstances, such as where the Personal Data is no longer necessary in relation to the purposes for which it was collected or processed.
- d. **Right to restriction.** The right to obtain the restriction of the processing undertaken by us on your Personal Data in certain circumstances, such as where the accuracy of the Personal Data is contested by you, for a period enabling us to verify the accuracy of that Personal Data.
- e. **Right to portability.** The right to portability allows you to move, copy or transfer Personal Data easily from one organization to another.
- f. **Right to object.** You have a right to object to processing based on legitimate interests and direct marketing.

If you wish to exercise one of these rights, please contact us using the contact details at the end of this Privacy Policy. You also have the right to lodge a complaint to your local data protection authority. Further information about how to contact your local data protection authority is available at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

COOKIES

What are cookies?

We may collect information using “cookies.” Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which are used only by us to recognize your computer or mobile device when it revisits our Site; and (2) third party cookies, which are served by service providers on our Site, and can be used by such service providers to recognize your computer or mobile device when it visits other websites.

Cookies we use

Our Site uses the following types of cookies for the purposes set out below:

Type of cookie	Purpose
<i>Essential Cookies</i>	These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. Without these cookies, the Services that you have asked for cannot be provided, and we only use these cookies to provide you with those Services.
<i>Functionality Cookies</i>	These cookies allow our Site or Application to remember choices you make when you use our Services, such as remembering your language preferences, remembering your login details and remembering the changes you make to other parts of our Site or Application which you can customize. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Site or use our Services.
<i>Analytics and Performance Cookies</i>	<p>These cookies are used to collect information about traffic to our Site and how users use our Site or Services. The information gathered does not identify any individual visitor. We use this information to help operate our Site and provide our Services more efficiently and to monitor the level of activity on our Site.</p> <p>Google Analytics:</p> <p>We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Site and Services work. You can find out more information about Google Analytics cookies here: https://developers.google.com/analytics/resources/concepts/gaConceptsCookies</p> <p>You can find out more about how Google protects your data here: www.google.com/analytics/learn/privacy.html.</p> <p>You can prevent the use of Google Analytics relating to your use of our Site and Services by downloading and installing the browser plugin</p>

	<p>available via this link: https://tools.google.com/dlpage/gaoptout?hl=en-US</p> <p>Flurry Analytics:</p> <p>Flurry Analytics is an analytics service provided by Yahoo! Inc.</p> <p>This service is designed for mobile apps analytics and can collect various information about your phone, highlighted in the Flurry Analytics privacy policy.</p> <p>If the User chooses to opt-out, Flurry will stop tracking data for the device identified by the provided MAC address and/or device identifier going forward. The analytics service tracking will stop across all applications within the Flurry network.</p> <p>You can find out more about how Flurry Analytics protects your data here: https://policies.oath.com/us/en/oath/privacy/index.html</p> <p>You can prevent the use of Flurry Analytics relating to your use of our Site and Services by visiting this link: https://developer.yahoo.com/flurry/end-user-opt-out/</p> <p>Facebook Analytics:</p> <p>Facebook Analytics is an analytics service provided by Facebook, Inc.</p> <p>You can find out more about Facebook’s privacy policy here: https://www.facebook.com/policy.php</p>
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Disabling cookies

You can typically remove and reject cookies from our Site with your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings. If you remove or reject our cookies, it could affect how our Site works for you.

Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org.

ACCOUNT AND WALLET SECURITY

The security of your Account and Wallet relies on your protection of your password, mobile device and any associated private keys. You are responsible for maintaining the security of your Account and Wallet. You are solely responsible for any and all activities that occur under your Account or Wallet. You may not share your password or the Application with anyone. We will never ask you to send your password or other sensitive information to us in an email, though we may ask you to enter this type of information on the Application interface.

Any email or other communication requesting your password or asking you to provide sensitive account information via email should be treated as unauthorized and suspicious and should be reported to us immediately at info@celer.network. If you do share your password or your mobile device with a third party for any reason, the third party will have access to your Account and your personal information, and you may be responsible for actions taken using your password. Such third party may also have access to your Account and any associated balances. If you believe someone else has obtained access to your password, please change it immediately. If you believe that an unauthorized access has already occurred, please report it immediately at info@celer.network

We take your privacy very seriously and work hard to protect Celer and you from unauthorized access to or unauthorized alteration, disclosure, or destruction of information we collect and store. We encrypt the Site using SSL encryption technology and all traffic on the Site is forced to use SSL. We review all information practices on a regular basis, and we restrict access to information on a need-to-know basis for all employees and other Celer service providers who are subject to confidentiality obligations and are subject to termination or disciplinary action, including legal action, should such employees or service providers breach these obligations. While two factor authentication is not presently required to access the Site and use our Services, we reserve the right to require use of two factor authentication in the future.

DATA STORAGE AND TRANSFER

Your information collected through our Service may be stored and processed in the United States or any other country in which Celer or its affiliates or service providers maintain facilities. If you are located in the EEA or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and we will take all steps reasonably necessary to ensure that any Personal Data are treated securely and in accordance with this Privacy Policy. Such transfers are made pursuant to appropriate safeguards.

You hereby consent to and authorize Celer to transfer, store and process your information to and in the U.S., and possibly other countries. If you wish to enquire further about these transfers, please contact us using the details set out at the end of this Privacy Policy.

For individuals based in the EEA or Switzerland, we store Personal Data for as long as necessary to fulfill the purposes for which we collect the data (see above under “Collection of Personal Information and Other Data”), except if required otherwise by law.

SPECIAL NOTICE REGARDING MINORS UNDER 16 YEARS OF AGE

The Services are only intended for use by those who have reached age 16 and older. By using the Services, you are affirming that you are at least 16 years old. We do not knowingly collect personal information from children under 16. If you believe that a child under the age of 16 has provided information to us, please notify us at info@celer.network. If we inadvertently collect information of children under 16, we will delete that information immediately upon notice. We are not liable for any damages that may result from the user’s misrepresentation of age.

MARKETING

If you do not want to receive marketing messages from us, you will be able to tell us by selecting certain boxes on forms we use when we first collect your contact details. You can change your marketing preferences by clicking on the unsubscribe link at the bottom of our emails.

MAINTAINING AND UPDATING YOUR ACCOUNT INFORMATION

As part of your use of the Services, you are responsible for maintaining and updating, as applicable, your Account information with current and complete information. You may edit and delete portions of your Account information. You can also delete your Account entirely.

After receiving any requested changes to your Account information or personal information, we will make reasonable efforts to ensure that all of your personal information stored in databases we actively use to operate the Services will be updated, corrected, changed, or deleted as appropriate, as soon as reasonably practicable. However, we reserve the right to retain in our archival files any information we remove from or change in our active databases. We may retain such information to resolve disputes, troubleshoot problems, and enforce our Terms of Service. In addition, it may not be technologically possible to remove every record of the information you have previously provided us, as a copy may exist in a non-erasable form that will be difficult or impossible for us to locate.

If you are the parent or guardian of a child under the age of 16, and you have discovered that your child created an Account and would like to have it deleted, please e-mail us at info@celer.network with your child's username, email address and password.

GOVERNING LAW; NOTIFICATION OF CHANGES

This Privacy Policy is governed by the laws of Singapore without giving effect to any principles of conflict of law. Any disputes under this Privacy Policy are governed by the terms of the dispute resolution provided for in our Terms.

Each time you use the Application or our Services, the current version of the Privacy Policy will apply. Accordingly, when you use the Application or our other Services, you should check the date of this Privacy Policy (which appears at the top of the Privacy Policy) and review any changes since the last version. Our business changes frequently and this Privacy Policy is subject to change from time to time. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you. We will not materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.

CONTACT US

To contact us with your questions or comments regarding this Privacy Policy or the information collection and dissemination practices of the Application, please email us at info@celer.network.