

Privacy Policy WindProtocol

Last Updated: 14th April 2019

Definitions	2
Types of Data Collected	3
Personal Data	3
Usage Data	4
Tracking Cookies Data	4
Information we collect from third parties	5
Use of Data	5
We Never Sell Personal Information	5
User of Personal Data & User Data	5
Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)	6
Retention of Data	6
Transfer Of Data	7
Disclosure Of Data	7
Security Of Data	8
Your Data Protection Rights Under General Data Protection Regulation (GDPR)	8
Service Providers	9
Analytics	9
Behavioral Remarketing	10
Payments	11
Links To Other Sites	11
Children's Privacy	12
Changes To This Privacy Policy	12
Contact Us	12

Effective date: May 25, 2018

Neufox Limited ("us", "we", or "our") operates the www.windprotocol.com website and the WindProtocol mobile applications (the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Definitions

Service

Service means the www.windprotocol.com website and the WindProtocol mobile application operated by Neufox Limited, a Private Limited Company, company number 11932320, Registrar of Companies for England and Wales.

Personal Data

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies

Cookies are small pieces of data stored on your device (computer or mobile device).

Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processors (or Service Providers)

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User)

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data
- Username
- Password
- Interests
- Expertise
- Company
- Job Title
- Facebook profile link
- Twitter profile link
- Telegram profile ink
- Medium link
- Linkedin profile link
- Personal website link
- Bio
- Languages
- Tokens held in portfolio
- Tokens held in watchlist or custom lists
- Virtual or Actual Portfolio Value
- Transaction history of trades
- List of exchanges you use and associated API keys
- Ethereum Address
- List of users that you follow
- List of users that follow you

- Total points collected
- Ratings across our leaderboards
- Rating history of tokens you have rated
- Comments or reviews you have left on tokens
- Upvotes or Downvotes you have given or received to/by other community members

We may use your Personal Data to match you with tokens, calculate your leaderboard positions, track your portfolio, calculate price forecasts, contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

Usage Data

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may link information we store within the analytics software to Personal Data you submit within the Mobile App. We do this to improve services we offer you and improve our marketing, analytics and site functionality.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier.

Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.
- **Advertising Cookies.** Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

To find out more about how we use cookies on our Service and how to manage your cookie preferences please see our Cookie Policy.

Information we collect from third parties

From time to time, we may receive Personal Data about you from third party sources including partners with which we offer co-branded services or engage in joint marketing activities, and publicly available sources such as social media websites.

Use of Data

Sale of assets

In the event that Neufox Limited is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction. Please be aware that once the information is transferred your privacy rights may change.

User of Personal Data & User Data

Neufox Limited uses the collected data for various purposes:

- To provide and maintain our Service
- To improve your browsing experience by personalizing the Websites and to improve the Service
- To send information or WindProtocol content to you which we think may be of interest to you by post, email, or other means and send you marketing communications relating to our business;
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so

- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information
- We use navigational information to operate and improve the Service. We may also use Navigational Information alone or in combination with Personal Data to provide you with personalized information.

We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do not transfer your Personal Data to the third party.

How we may share your Personal Data

Service Providers

We employ other companies and people to provide services to visitors to our Websites, our customers, and users of the Service and may need to share your information with them to provide information, products or services to you. Examples may include analyzing data or performing statistical analysis, providing marketing assistance, processing credit card payments, supplementing the information you provide us in order to provide you with better service, and providing customer service or support. In all cases where we share your information with such agents, we explicitly require the agent to acknowledge and adhere to our privacy and customer data handling policies.

Partners

In addition, we may share data with trusted partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide customer support. Such third parties are prohibited from using your Personal Data except for these purposes, and they are required to maintain the confidentiality of your information.

We partner with trusted third parties to provide you with co-marketing content that we think may be relevant to you. When you engage with these co-marketing partners, we will tell you who we are sharing data with, and provide a link to the co-marketing partner's privacy policy so you can

learn more about how to opt-out of the partner's communications. These co-marketing partners are required to adhere to our privacy and data protection policies.

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Neufox Limited's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Neufox Limited may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

If you are a visitor/customer located in the European Economic Area ("EEA"), our Data Protection Officer can be contacted at marc@windprotocol.com. Your data is stored on German and Singapore based servers although we also use a third party Content Distribution Network (CDN) which may replicate your data on servers in other jurisdictions to improve the quality of Service.

Retention of Data

Neufox Limited will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Neufox Limited will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

When we have no ongoing legitimate business need to process your Personal Data, we securely delete the information or anonymise it or, if this is not possible, then we will securely store your Personal Data and isolate it from any further processing until deletion is possible. We will delete this information from the servers at an earlier date if you so request. To do so, click on "Delete" in your account settings.

Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Cayman Islands and choose to provide information to us, please note that we transfer the data, including Personal Data, to Cayman Islands and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Neufox Limited will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure Of Data

Business Transaction

If Neufox Limited is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

Disclosure for Law Enforcement

Under certain circumstances, Neufox Limited may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

Neufox Limited may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Neufox Limited
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security Of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

"Do Not Track" Signals

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

We use a variety of security technologies and procedures to help protect your Personal Data from unauthorized access, use or disclosure. We secure the Personal Data you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All Personal Data is protected using appropriate physical, technical and organizational measures.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Neufox Limited aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.

The right to object. You have the right to object to our processing of your Personal Data.

The right of restriction. You have the right to request that we restrict the processing of your personal information.

The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

The right to withdraw consent. You also have the right to withdraw your consent at any time where Neufox Limited relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

To exercise any of these rights, please contact us at marc@windprotocol.com

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

Mixpanel

Mixpanel is provided by Mixpanel Inc

You can prevent Mixpanel from using your information for analytics purposes by opting-out. To opt-out of Mixpanel service, please visit this page: <https://mixpanel.com/optout/>
For more information on what type of information Mixpanel collects, please visit the Terms of Use page of Mixpanel: <https://mixpanel.com/terms/>

Advertising

We may use third-party Service Providers to show advertisements to you to help support and maintain our Service.

Google AdSense DoubleClick Cookie

Google, as a third party vendor, uses cookies to serve ads on our Service. Google's use of the DoubleClick cookie enables it and its partners to serve ads to our users based on their visit to our Service or other websites on the Internet.

You may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page: <http://www.google.com/ads/preferences/>

AdMob by Google

AdMob by Google is provided by Google Inc.

You can opt-out from AdMob by Google service by following the instructions described by

Google: <https://support.google.com/ads/answer/2662922?hl=en>

For more information on how Google uses the collected information, please visit the "How Google uses data when you use our partners' sites or app" page:

<http://www.google.com/policies/privacy/partners/> or visit the Privacy Policy of Google: <http://www.google.com/policies/privacy/>

Behavioral Remarketing

Neufox Limited uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

Google AdWords

Google AdWords remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out

Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

Facebook

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA

<http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada

<http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe

<http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

Apple Store In-App Payments

Their Privacy Policy can be viewed at <https://www.apple.com/legal/privacy/en-ww/>

Google Play In-App Payments

Their Privacy Policy can be viewed at <https://www.google.com/policies/privacy/>
Stripe

Their Privacy Policy can be viewed at <https://stripe.com/us/privacy>

Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

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 Children has provided us with Personal Data, please contact us. 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.

Changes To This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact Marc Thalen, our Data Protection Officer by email:

- By email: marc@windprotocol.com

