



Last updated 22/08/2018

PRIVACY POLICY for www.arfreyr.com

1. INTRODUCTION

This Privacy Policy governs the processing (obtaining, recording, holding, disclosing etc.) by the Sudesh Web Services Private Limited, a company registered in India (herein after ARFREYR, we, us, our), of information collected from users (hereinafter User, you, your or yours) of the <https://www.arfreyr.com> website (hereinafter Website), ARFREYR services or any other features, technologies or functionalities offered by ARFREYR on the Website or through any ARFREYR mobile applications and other online services offered by ARFREYR (collectively, Services) that link to or reference this Privacy Policy. By using the Website and/or Services, you signal your acceptance to this Privacy Policy. If you do not agree to this Privacy Policy, please do not use our Website. Your continued use of the Website following the posting of changes to this policy will be deemed as your acceptance of those changes.

The security of your personal data is important to us. ARFREYR has safeguards in place to protect the personal data stored with us. This policy describes how we may collect, use, disclose, process and manage your personal data.

Our Website may contain links to other websites which are not maintained by ARFREYR. This Privacy Policy only applies to the information collected by us through our websites and/or Services and does not apply to third party websites and services that you may access through these links. When visiting these third-party websites, you should read their privacy policies, which will apply to your use of these websites.

2. THE COLLECTED DATA

2.1. Personal identification information you provide to us:

2.1.1. We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our Website, register on the Website, fill out a form, and in connection with other activities, services, features or resources we make available on our Website.

2.1.2. We collect and process information you provide directly to us when you use our Services. For example, the types of personal information we may collect from you when you visit or use our online services include your name, e-mail address, mailing address, social security number, telephone number(s), account number(s), passport number, user name and password. You may choose to provide other information to us.

2.1.3. We will collect personal identification information from Users only if they passively or voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Website related activities. Thus, in some cases, we will be unable to render services to you if you do not provide us personal identification information due to the requirements of anti-money laundering laws and other legal acts.

2.2. Information which we collect automatically:

2.2.1. We may collect non-personal identification information about Users whenever they interact with our Website or Services. This may include, but is not limited to:

- a) Log information – we collect log information about your use of the online services, including the type of browser you use, access times, pages viewed, your IP-address and the page you visited before navigating to our online services

- b) Device information – we collect information about the computer or mobile device you use to access our online services, including the hardware model, operating system and version, unique device identifiers and mobile network information;
- c) Location information – we may collect information about the location of your device each time you access or use one of our mobile applications or otherwise consent to the collection of this information;
- d) Information collected from cookies – we or our third-party partners may use cookies (as well as web beacons or other technologies) to collect and store this and other information about your visit to, or use of, our online services. You may set up your web browser to block cookies from monitoring your Website visit.

2.3. Information which we collect from other sources:

2.3.1. We may also collect information about you from additional online and offline sources including commercially available third-party sources. We may combine this information with the personal and other information we have collected about you under this Privacy Policy.

3. HOW ARFREYR USE THE COLLECTED INFORMATION

3.1. We may use your personal information for the following purposes:

- a) To provide, maintain and improve customer services;
- b) To carry out Know-Your-Customer and Anti-Money-Laundering checks and to comply with and enforce other obligations arising from applicable laws and regulations, relevant industry standards, contractual obligations and our policies;
- c) To analyse your account activity in order to provide you with an adequate and reliable service;
- d) To offer you the best possible options suitable for your needs.

3.2. Furthermore, by accepting this Privacy Policy, you will consent to us using your personal information for the following purposes, from which you are free to withdraw your consent at any time:

- a) Communicate information to you at the request of our partners;
- b) Manage our risks;
- c) Market our products or services, including special offers, promotions, contests or entitlements that may be of interest to you;
- d) Carry out any other purpose for which the information was collected.

3.3. We may also use data that we collect on an aggregate or de-identified basis for various business purposes, where permissible under the applicable laws and regulations.

3.4. We will ask the User's separate consent before using the collected information for purposes that are not listed herein.

3.5. We store the collected information for as long as it is necessary to provide Services to you. We generally store information on your transactions for five years. The information associated with your account will be kept until your account is deleted, unless we no longer need the data to provide Services.

4. DISCLOSING YOUR INFORMATION

4.1. We will not sell or trade your information unless we provide you with advance notice. We may share information about you as follows:

- a) With current and future ARFREYR partners, affiliates, subsidiaries and other companies under common control and ownership in the course of delivering our Services to you;
- b) With affiliates, consultants, and other service providers when we believe it will enhance the Services and products we can provide to you, or for legal and routine business reasons, so long as those parties agree to keep this information confidential;
- c) We may also release information when its release is appropriate to comply with the law, enforce our Website policies, or protect our or others' rights, property or safety. This does not include

website hosting partners and other parties who assist us in operating our Website, conducting our business, or serving our users;

d) With your consent or at your direction.

4.2. We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

5. SECURITY AND STORAGE OF INFORMATION

5.1. We adopt appropriate data collection, storage and processing practices and security measures to protect from unauthorised access, alteration, disclosure or destruction of your personal information, user credentials, transaction information, and data stored on our Website. As soon as we receive your private information, we implement reasonable security measures and procedures to avoid unauthorised access from any third party. However, transmission of such data over the Internet using personal computers or mobile devices is not completely safe and, therefore, we cannot guarantee absolute security of all information submitted to our platform. Any transmission of such information and documents is at your own risk.

5.2. The information that we collect from you may be transferred to and stored at a destination outside your country, in particular where counter-parties to any of the service offered through our Website are based outside of your country. Your information may also be processed by staff operating outside of your country who works for us or for one of our suppliers. By submitting information to us, you agree to such transfer, storing or processing.

6. BUSINESS ACQUISITION OR TRANSFERS

6.1. If ARFREYR, or substantially all of its assets, were acquired, or in the unlikely event that ARFREYR goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of ARFREYR may continue to use your personal information as set forth in this policy.

7. CHILDREN UNDER THE AGE OF 18

7.1. ARFREYR are not intended or directed at individuals under the age of 18. Therefore, individuals under the age of 18 may not create an account or otherwise access or use our Services.

8. YOUR CHOICES

8.1. The choices we may give you in regard to the sharing of information with our partners, affiliates and third parties, will be described in the privacy policies or notices you receive in connection with the products or services you obtain from us.

8.2. We may provide you with tools and settings that allow you to access, correct, delete and modify information associated with your account.

8.3. You may also remove cookies stored from your computer or mobile device. However, if you do block cookies, you may not be able to use certain features and functions of our Website.

9. COOKIE POLICY

9.1. A cookie is a very small text document or piece of code, which often includes an anonymous unique identifier. When you visit a website or use a mobile application, a computer asks your computer or mobile device for permission to store this file (or similar technologies such as web beacons) on your computer or mobile device and access information from it. Information gathered through cookies or similar technologies may include the date and time of visits and how you are using the website. Cookies are used by us as part of this Website. Our Website also uses third party cookies for analytics. By continuing to use our Website you are deemed to consent to our

use of the cookies described in this Cookie Policy. If you do not consent to us using cookies then please read the next section.

9.2. You can block the use of cookies by activating the relevant settings in your browser. If you choose to withhold consent, or subsequently block cookies, some aspects of the Website may not work properly and you may not be able to access all or part of the Website because in order to use some parts of our Website, your web browser will need to accept cookies.

a) Google Analytics (Third Party Cookie) – These cookies enable us to store information such as the time you visit our Website, whether you have visited before and the Website that you visited prior to visiting our Website.

9.3. We use the following types of cookies or similar technologies:

For more information about Google Analytics please see: <http://www.google.com/intl/en/analytics/privacyoverview.html> .

b) Twitter, Slack, Telegram and LinkedIn buttons – These cookies enable users to like or share items in social pages. For more information see respective page privacy policy.

c) Track URL – This cookie informs us which webpage you visited immediately before coming to our Website. It does not collect any personal data or send personal data any third party.

9.4. We use session cookies to allow the Website to uniquely identify your browsing session on the Website, which allows us to coordinate this information with data from the Website server. Such cookies are stored temporarily during a browsing session and are deleted from the user's device when the browser is closed. We also use persistent cookies that may be saved on your computer for a fixed period and are not deleted when the browser is closed where we need to know who you are for more than one browsing session. For example, we use this type of cookie to store your preferences, so that they are remembered for the next visit, or to keep you logged in if you navigate away. We may also use cookies where they are essential for the operation of the Website, for example to remember that you are signed in to the Website during your session.

9.5. We use analytics cookies. These, along with other information, allow us to calculate the aggregate number of people using the Website and which features of the Website are most popular. We use this information to improve the Website. We do not generally store any personal data that may be provided to us in a cookie.

10. ADVERTISEMENT

10.1. Ads appearing on any of our websites may be delivered to users by advertising partners, who may set cookies. These cookies allow the ad server to recognise your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by ARFREYR and does not cover the use of cookies by any advertisers.

11. SOCIAL SHARING FEATURES

11.1. Our Website may offer social sharing features, links to social media and other integrated tools. Your use of such features enables the sharing of information with your contacts or the public, depending on the settings you use with the entity that provides the social sharing feature or social media. Please visit the privacy policies of the entities that provide these features to obtain more information about the purpose and scope of data collection and the processing of such data by such entities.

12. HYPERLINKS AND THIRD-PARTY SITES

12.1. This Website may contain links to other third party websites that may collect personal information about you, including through cookies or other technologies. If you link to another website, you will leave this Website and this Privacy Policy will not apply to your use of and activity on those other websites. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any information that is submitted to or collected by these third parties.

13. CHANGES TO THE PRIVACY POLICY

13.1. We may change this policy from time to time to ensure that this policy is consistent with any developments to the way ARFREYR uses your personal data, or any changes to the laws and regulations applicable to ARFREYR. If we do, we will let you know by appropriate means, such as by posting the revised policy on our Website with a new Version from date. All changes will become effective when posted unless indicated otherwise.

14. CONTACT US

14.1. We provide Users with access to their personal identification information. Users may update or delete such information at any time on their own discretion. We will not keep outdated or deleted information, unless we have to do so for legitimate business purposes or in accordance with legislative or regulatory requirements.

14.2. You have the right to request a copy of your information that we hold. Please submit a written application at support@arfreyr.com. If any of your information that we hold is incorrect, you can change it by contacting us at support@arfreyr.com

14.3. With any other questions or concerns about this Privacy Policy, you may contact us at support@arfreyr.com