

## Privacy Policy

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### **1. Introduction**

Ethereum Horizons II LLC ("**us**", "**we**" or "**Portis**") respect the privacy of our users (each, "**you**" or "**User**") and are committed to protect the privacy of Users who use our software development kit (the "**Platform**"), our website or any other services we provide (collectively: the "**Services**").

We have prepared this Privacy Policy to outline our practices with respect to collecting, using and disclosing your information when you use the Services.

We encourage you to read this Privacy Policy carefully and use it to make informed decisions. By using the Services, you agree to the terms of this Privacy Policy and your continued use of the Services constitutes your ongoing agreement to the Privacy Policy.

The Privacy Policy is a part of the Terms of Service (<https://assets.portis.io/legal-documents/terms-of-service.pdf>) and is incorporated therein by reference.

In this Privacy Policy you will read about, among other things:

- **What type of information do we collect?**
- **Cookies and Google Analytics**
- **How do we use your information?**
- **With whom do we share your information and for what purpose?**
- **How long do we retain your information for?**
- **How do we protect your information?**
- **Advertisements**
- **How may you contact us**

### **2. What type of information do we collect?**

We may collect two types of data and information from our Users.

The first type of information is un-identified and non-identifiable information pertaining to you, which may be made available or gathered via your use of the Services ("**Non-personal Information**"). We are not aware of the identity from which the Non-personal Information is collected. Non-personal Information which is collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information about your device (e.g., the device you use, the type of browser and operating system your device uses, language preference, access time and the website's domain name from which you linked to the Services, etc.), in order to enhance the functionality of the Services. We may also collect information about your activity on the Services (e.g., actions, times, etc.).

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual ("**Personal Information**"). Such information may include:

- **Account Information:** When you register to the Services through the Platform or our website, we may collect from you the following information: phone number, email address, and any other information you agreed to share with us.



- **Voluntary Information:** We may collect information which you provide us voluntarily. For instance, when you respond to communications from us, communicate with us via email or share additional information about yourself through your use of the Services. We may also collect the feedback, suggestions, complaints and reports which you send to us. Please note that we may also collect complaints about you from other Users, which may include your Personal Information.
- **Device Information:** We may collect Personal Information from your device. Such information may include IP address, unique identifiers (e.g., UUID) as well as other information which relates to your activity through the Services.

For avoidance of doubt, if we combine Personal Information with Non-personal Information, the combined information will be treated as Personal Information as long as it remains combined.

### **3. Cookies and Google Analytics**

We may use cookies and other technologies or methods of web and mobile analysis (e.g., pixels, amplitude, intercom, mailchimp, hotjar, etc.) to gather, store, and track certain information related with your access to and activity through the Services, including when you visit our website.

A "cookie" is a small piece of information that a website assign to your device while you are viewing a website. Cookies are very helpful and may be used for various different purposes. These purposes include, among other things, allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and the Services quicker, easier and smoother.

Our website may use the following types of cookies:

- **Session Cookies** - cookies that are only stored temporarily during a browsing session in order to allow normal use of the system and are deleted from your device when the browser is closed.
- **Persistent Cookies** - cookies that are saved on your device for a fixed period and are not deleted when the browser is closed. Such cookies are used where we need to identify who you are for repeated visits (for instance, to allow us to store your preferences for the next sign-in).
- **Third-Party Cookies** – cookies that are set by other online services that run content on the page you view on your browser (for example, by third-party companies who monitor and analyze our website access).

You may remove the cookies by following the instructions of your device preferences. However, if you choose to disable cookies, some features of the Services may not operate properly and your online experience may be limited.

We also use a tool called Amplitude to collect information about your use of the Services. Amplitude collects information such as how often users access the Services, what pages they visit when they do so, etc. We use the information we get from Amplitude only to improve our Services. Amplitude collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not combine the information collected through the use of Amplitude with personally identifiable information. Amplitude's ability to use and share information collected by Amplitude about your visits to this site is restricted by Amplitude's [Terms of Service](#) and [Privacy Policy](#).

We may link the information collected by Cookies with other information we collect from you pursuant to this Privacy Policy and use the combined information as set forth herein.



#### **4. How do we use your information?**

We use and share Personal Information in the manners described in this Privacy Policy. In addition to the purposes listed above, the information we collect, which may include your Personal Information, is used for the following purposes:

- To set up your account and to provide the Services;
- To identify and authenticate your access to the Services;
- To authenticate your identity for the purpose of compliance with regulatory Know Your Customer requirements of partner services;
- To communicate with you and to keep you informed of our latest updates;
- To contact you via email, phone or text message, to deliver certain services or information you have requested.
- To market our website, products and the Services;
- To perform a research or to conduct analytics in order to improve and customize the Services to your needs and interests;
- To support and troubleshoot the Services and to respond to your queries;
- To investigate and resolve disputes in connection with your use of the Services;
- To detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the Services; and
- To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request.

#### **5. With whom do we share your information and for what purpose?**

We do not rent, sell, or share your Personal Information with third-parties except as described in this Privacy Policy.

We may share Personal Information with the following recipients: (i) our subsidiaries; (ii) affiliated companies; (iii) subcontractors and other third-party service providers; (iv) auditors or advisers of our business processes; and (v) any potential purchasers or investors in Portis or its affiliates.

In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our recipients for any of the following purposes: (i) storing or processing Personal Information on our behalf (e.g., cloud computing service providers); (ii) processing such information to assist us with our business operations; (iii) performing research, technical diagnostics, personalization and analytics.

We may also disclose Personal Information, or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies, including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our affiliates, our Users, yourself or any third-party; (vi) for the purpose of collaborating with law enforcement agencies; and (vii) in case we find it necessary in order to enforce intellectual property or other legal rights.

#### **6. Third-party collection of information**



Our policy only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties via the Services (e.g., by clicking on a link to any other website or location) or via other sites throughout the Internet, different rules may apply to their use or disclosure of the information you disclose to them.

You acknowledge that we are not responsible for the products, services, or descriptions of products or services that you receive from third-party sites or to the content or privacy practices of those sites, and that this Privacy Policy does not apply to any such third-party products and services. You are knowingly and voluntarily assuming all risks of using third-party sites to purchase products and services. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

#### **7. How long do we retain your information for?**

We value your privacy and control over your Personal Information, and therefore you may, at any time, request to change and update it by emailing us at [info@portis.io](mailto:info@portis.io). You can also request that we will correct errors or that we will erase your Personal Information (except for data that we are required or authorized to keep under applicable laws) by emailing us at [info@portis.io](mailto:info@portis.io).

Please note that unless you instruct us otherwise we retain the information we collect for as long as needed to provide the Services and to comply with our legal obligations, resolve disputes and enforce our agreements.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

#### **8. How do we protect your information?**

We take great care in implementing and maintaining the security of the Services and your information. We employ industry standard procedures and policies to ensure the safety of your information, and prevent unauthorized use of any such information. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse the Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

If you feel that your privacy was treated not in accordance with our policy, or if any person attempted to abuse the Services or acted in an inappropriate manner, please contact us directly at [info@portis.io](mailto:info@portis.io).

#### **9. Corporate transaction**

We may share information, including Personal Information, in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale of an asset or transfer in the operation thereof) of Portis. In the event of the above, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy.

#### **10. Minors**

The Services are not designated for individuals under the age of 13. If you are under 13 years old, you may not use the Services, or provide any Personal Information to us. If you are between the age of 13 and 16, you may not use the Services or provide any Personal Information to us without first obtaining parental consent.

We reserve the right to access and verify any Personal Information collected from you. In the event that we become aware that an individual under the age of 13 or 16 (absent parental consent) has shared any information, we will discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us at [info@portis.io](mailto:info@portis.io).



## **11. Updates or amendments to the Privacy Policy**

We may revise this Privacy Policy from time to time, in our sole discretion, and the most current version will always be posted on our website or Platform (as reflected in the "Last Revised" heading). In the event of a material change to the Privacy Policy, we will notify you through the Services or via email, or you may be notified within the Platform. We encourage you to review this Privacy Policy regularly for any changes.

Your continued use of the Services, following the notification of such amendments, constitutes your acknowledgement and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

## **12. How to contact us**

If you have any general questions regarding the Services or the information that we collect about you and how we use it, please contact us at [info@portis.io](mailto:info@portis.io).

[Insert street address]