

## Privacy Policy

This Privacy Policy ("Policy") describes our policies regarding the collection, usage, protection and processing of personally identifiable information received from Users ("User", "You") of the <https://cspay.io/> and its related applications and services ("Wallet", "We", "Our" or "Us").

We encourage you to read our Privacy Policy carefully before using our Wallet. We do not collect any information that may identify You without your permission. However by using the Wallet, you give us a consent and permission to collect, store and use the information about you, including your personal information, as prescribed by this Policy. You acknowledge and agree that such personal information may be transferred to and stored on the servers of the Wallet and the servers of authorized third parties.

1. We may collect the information provided or generated whenever the User takes any action in our Wallet or omits to do it or otherwise uses Our services, such as without limitation:

- Information about yourself, which You may provide to Us, including, but not limited to the name, email address, mailing address, phone number, alias, password and photo used by you as an identifier of your account, that allow us to designate the specific wallet to you and provide you with the exclusive access to your funds.;
- IP address to identify the session and allow you to terminate the session that doesn't belong to you;
- Cookies. Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to Your browser from the Wallet and stored on Your computer's hard drive. Like many Wallets, We use "cookies" to collect information. We use cookies on our Wallet to collect data about Your visit and to allow You to navigate from page to page without necessity to re-login each time, count visits, and see which areas and features of our Wallet are popular. You can control and/or delete cookies if you wish. You can delete all cookies that are already on Your computer and You can set most browsers to prevent them from being stored therein. If You do this, however, You may have to manually adjust some preferences every time You visit the Wallet and some services and functionalities may not work;

The type (including identifiers) of the device of the mobile devices You use with the Wallet, platform type, geolocation information, internet service, operating system,

browser, browser language etc. to provide the best service and identify possible issues with particular type of device or operating system or language;

In-Wallet behavioral information such as without limitation Your visits of the Wallet, clicks on ads or other similar information including additional related data (or metadata), such as the time, date, and location related to such behavior. That information would help you to regain access to your wallet in case you lose your device or forget the password. It also allows us to analyse the usage of our wallet and may help us to design the better UI in the wallet;

2. We share some personal information with certain providers that perform services on our behalf. We only share the personal information which is necessary for them to perform those services. We require any provider with which we may share personal information to protect that data in a manner consistent with this policy and to limit the use of such personal information to the performance of services for CSPay. Please note that those providers have its' own privacy policies which will govern the shared information.

3. We implement a variety of security measures when You enter, submit, or access to our Wallet in order to maintain the safety of Your personal information. We do not use vulnerability scanning and/or scanning to PCI standards. We use regular malware scanning. Your personal information is contained behind secured networks and is only accessible by a limited number of staffs who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information You supply is encrypted via Secure Socket Layer (SSL) technology.

4. Without prejudice to Our efforts on protection of Your information nothing herein constitutes a warranty of security of the Wallet, and You agree to transmit information at Your own risk. Please note, that the Wallet does not guarantee that Your information may not be accessed, disclosed, altered, or destroyed by breach of any of Our physical, technical, or managerial safeguards.

5. We may use the information we collect from You in any ways in order to:

- Deliver the type of content and product in which You are interested in;
- Improve customer service;
- Quickly process Your transactions;
- Provide responses to official requests of competent authorities;
- Send information and updates pertaining to Your use of the Wallet via periodic

e-mails;

- Help you to regain the access to your wallet in case of lost devices or forgotten password.

6. Notwithstanding anything to the contrary in this Privacy Policy, We may preserve or disclose Your information if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; to protect the safety of any person or assets and rights related thereto; to address fraud, security or technical issues. The Wallet may in particular share Your personal information with law enforcement, data protection authorities, government officials, and other authorities only when the Wallet is legally bound to do so or has to protect the safety of users and the Wallet.

7. You acknowledge and agree that the Wallet is not liable for any illegal or abusive use of Your information. You acknowledge and agree, that in case You share Your information from the Wallet in social or other networks, or other third-party sites and/or platforms, your information is subject to privacy policies of such third-party resources.

8. The information which is no longer identifiable is eligible to be transferred to and to be shared with the third parties such as without limitation Our services' providers or advertising partners.

9. We may, at Our sole discretion, include or offer third-party products or services in the Wallet. These third-party providers have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked services.

10. The wallet may update this Policy at any time. We will notify you on any changes prior to the date when they become effective by email (sent to the e-mail address specified in your account) or in the announcement in the wallet or on the website.

12. If there are any questions regarding this Policy or feedback related thereto You may contact Us using the info@CSPay.io e-mail.

This Privacy Policy was last updated on 29 May2019.