

# Privacy Policy of Etheal

Etheal Foundation OÜ (“Etheal”) is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the Personal Data (as defined below) we collect from users of our website, located at <https://etheal.com> (“Site”) and online services (“Services”).

The privacy of customers' data is very important to us. Etheal collects user information to better understand users and offer better services.

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

## Data Controller and Owner

Etheal Foundation OÜ

Jõetn 5, Kesklinnadistrict, Tallinncity, Harjucounty, 10151

**Owner contact email:** [info@etheal.com](mailto:info@etheal.com)

## Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies, Usage Data and email address.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

The Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

All Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without any consequences on the availability or the functioning of the service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Application or by the owners of third party services used by this Application serves the purpose of providing the service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

## Methods of processing

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

**Place**

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

**Retention time**

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

**The use of the collected Data**

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Analytics, Managing contacts and sending messages, Remarketing and behavioral targeting and SPAM protection, Know Your Customer and Anti Money Laundering regulations. The Personal Data used for each purpose is outlined in the specific sections of this document. We collect personally identifiable information including your name, email, address, telephone, fax and mobile numbers, device information, IP address, geographical information, web pages visited, age, gender, weight or any other information that you provide Us through forms or data collection pages within the App including the form filled while registering the Account. Information is also collected automatically through your continued regular usage of Tokens and the Website. The information collected as mentioned in this clause is retained in our server and/or the backup server and We cannot entertain requests for deletion of such information without restricting your access to services and blocking you from the Website and the Bob's Repair ecosystem. Request for deletion may be made through the contact details and/or form provided on the Website.

**Cookie Policy**

Like many online services, we use cookies to collect information. "Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. This type of information is collected to make the Site more useful to you and to tailor the experience with us to meet your special interests and needs.

**Additional information about Data collection and processing****Legal action**

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services.

The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

**Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

**System logs and maintenance**

For operation and maintenance purposes, this Application and any third party services may collect files that record interaction with this Application (System logs) or use for this purpose other Personal Data (such as IP Address).

#### **KYC and AML data**

We collect additional information to comply with Regulatory guidelines and to comply with anti money laundering (AML) or “know-your-customer” (KYC) policies.

We may require You to provide additional information with documentary proof including, and namely:

- Date of birth;
- Passport or driver license or other Government issued identification document details;
- Tax Identification Numbers;
- Utility bills;
- Photographs;
- Confirmation of source of funds;
- Sworn statements or Affidavits.

The information and documents may be sought in printed form or through email or online submission or any other mode as deemed fit by the Website Owner.

#### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

#### **The rights of Users**

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Application does not support “Do Not Track” requests.

To determine whether any of the third party services it uses honor the “Do Not Track” requests, please read their privacy policies.

#### **Changes to this privacy policy**

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

#### **Information about this privacy policy**

The Data Controller is responsible for this privacy policy, prepared starting from the modules provided by lubenda and hosted on lubenda's servers.

#### **A Note About Children.**

We do not intentionally gather Personal Data from visitors who are under the age of 18. If a child under 18 submits Personal Data to Etheal and we learn that the Personal Data is the information of a child under 18, we will attempt to delete the information as soon as possible. If you believe that we might have any Personal Data from a child under 18, please contact us at [info@etheal.com](mailto:info@etheal.com)

### **Personal Data (or Data)**

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

### **Usage Data**

Information collected automatically from this Application (or third party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual using this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refers.

### **Data Subject**

The legal or natural person to whom the Personal Data refers.

### **Data Processor (or Data Supervisor)**

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

### **Data Controller (or Owner)**

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

### **This Application**

The hardware or software tool by which the Personal Data of the User is collected.

**Cookies**

Small piece of data stored in the User's device.

**Legal information**

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations under Art. 10 of EC Directive n. 95/46/EC, and under the provisions of Directive 2002/58/EC, as revised by Directive 2009/136/EC, on the subject of Cookies.