

## UBIKIRI PRIVACY POLICY

Effective date: April 26, 2019

### 1. General

The purpose of our online service Ubikiri is to provide you with trusted and safe solution to save and certify documents, emails, chats, and audio- and video recordings while securing authenticity using blockchain technology (hereinafter "Ubikiri Services").

To achieve such a solution we collect certain information or data about you when you use Ubikiri Services.

We respect and protect your privacy. This Privacy Policy tells you how we collect and use the information of our Users.

### 2. Information Ubikiri Collects

**Non-personal data.** When you use Ubikiri for familiarization purposes only, we collect:

- a) your IP address, and details of which version of web browser you used;
- b) information on how you use the site, using cookies and page tagging techniques.

This information helps us to improve Ubikiri.

We consider this information to be non-personal data, i.e. data not relating to an identified or identifiable person, which does not identify User personally.

**Personal data.** When you use Ubikiri Services to save and certify documents, emails, chats, or audio- or video recordings using blockchain technology, we may collect:

- a) Your name;
- b) Your e-mail;
- c) other data, which is necessary for making valid legal transactions (depending on the Ubikiri Services, which you use, and a country of registration of the User).

This information allows you to make safe and legally binding transactions on our platform Ubikiri.

**Payment Information.** When You pay for the Ubikiri Services we collect certain payment information, such as credit card, billing address or other financial account information. We consider this information to be a type of User's personal data.

**Subscribing to Newsletters.** When you subscribe to our newsletters, we will process your e-mail address to verify your subscription and provide you with information on Ubikiri Services's changes, surveys, upcoming special offers/events or educational content we believe may be of interest. You can cancel your subscription at any by following the 'unsubscribe' link you can find in such newsletters.

**Information collected from Users Automatically.** When You interacts with Ubikiri Services, Ubikiri and Ubikiri's third party service providers, including analytics and third party content providers, may automatically collect certain information from User including but not limited to: (i) the browser and operating system User is using; (ii) the Internet Protocol ("IP") address or other unique device identifier ("Device Identifier") for any device (computer, mobile phone, etc.) used to access the Ubikiri; (iii) the URL or advertisement that referred User to the Ubikiri Services, information regarding the physical location of the device used to access the Ubikiri Software; (iv) information on how User uses the Ubikiri

Services, using cookies, page tagging and other techniques. We use the following technologies: Yandex Metrics, Google Analytics, including User ID feature, Google Tag Manager, Google AdWords, Facebook Analytics to collect and compile information regarding visitor behavior and visitor demographics. The privacy practices of these tools are subject to their own privacy policies. We, therefore, encourage You to read Google's policy regarding its analytics services at:

<http://www.google.com/analytics/learn/privacy.html>. You can opt out of Google's collection and Processing of data generated by your use of the Website by going to

<http://tools.google.com/dlpage/gaoptout>. You can opt out of Yandex Metrics by going to

<https://yandex.com/support/metrica/general/opt-out.xml>. Facebook's privacy policy can be found at:

<https://www.facebook.com/policy.php#sharing-partner-information>.

**Combination of personal and non-personal data.** Certain non-personal data would be considered a part of User's personal data if it were combined with other User's identifiers in a way that enables User to be identified (for example, combining User's IP address information with User's name). But the same pieces of information are considered non-personal data when they are taken alone or combined only with other non-data (for example, User's IP address and User's viewing preferences). Ubikiri may combine User's personal data with non-personal data, but will treat such combined information as User's personal data.

### **3. Information Ubikiri Does Not Collect**

**We do not collect personal data revealing:**

- a) racial or ethnic origin;
- b) political opinions;
- c) religious or philosophical beliefs;
- d) data concerning health or sex life.

**Ubikiri does not knowingly collect personal data from anyone younger than age 18.** Ubikiri online services are intended for legal entities, self-employed entrepreneurs or individuals above the age of 18. If you are the parent or legal guardian of a person younger than age 18 and believe that Ubikiri has collected personal data from such person, please contact us at: [hello@silentnotary.com](mailto:hello@silentnotary.com), we will use commercially reasonable efforts to delete such information from our files.

### **4. How Ubikiri Uses Your Data**

**We use your information only:**

- a) to send you information regarding your account;
- b) to take steps at the request of the data subject prior to entering into a contract via Ubikiri;
- c) to uphold your compliance with the Terms of use and other legal obligations you are subject to and you agreed to be bound by and take appropriate measures in cases of non-compliance with them;
- d) for validation, suppression, content improvement and feedback purposes.

### **5. How Ubikiri Secures Your Data**

We protect your information once we receive it in accordance with our procedures and security features.

Your payment transactions are always encrypted.

We maintain appropriate safeguards and current security standards to minimize the risks of unauthorized access, disclosure, or misuse of Your Data.

## **6. How Ubikiri Shares Your Data with Others**

We may disclose or use your provided information if we have a legal obligation to do so, or if we have to enforce or apply our Terms of use and other agreements you are subject to and you agreed to be bound by.

This includes exchanging information with banks and government departments for legal reasons.

## **7. What are Your rights in relation to the use of Your Data**

Rights to access, update, correct and request deletion:

To access, correct, update or request deletion of Your Data. Ubikiri takes reasonable steps to ensure that the data we collect is accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating or erasing your Personal Information at email. Such requests will be processed in line with local laws. We may ask you to provide us with certain credentials to verify your identity before granting access to or making any changes to Your Data.

## **8. What are Your EU Data Subject Rights**

In operating the Website, We process Your data as a controller (as such terms are defined in the GDPR). As a controller, We are committed to fulfill data subjects' ('Users') GDPR rights. As an EU resident, you have the right of access (Art 15 GDPR), the right to rectification (Art 16 GDPR), the right to erasure of your personal data (Art 17 GDPR), the right to restriction of processing of your personal data (Art 18 GDPR) as well as the right to data portability (Art 20 GDPR). Furthermore, you have the option to file a complaint against the processing of your personal data with the competent supervisory authority.

As an EU resident, you may contact Us at any time at: [hello@silentnotary.com](mailto:hello@silentnotary.com) and request access, rectification, erasure or restriction of the personal information that We keep on You.

We may ask you to provide us certain credentials to verify your identity before granting access to or making any changes to Your Data.

## **9. Ubikiri Opt-out Policy**

Users may change their choices regarding the types of communications you receive from us through your online account. User also may opt-out of receiving marketing emails from Ubikiri by following the opt-out instructions provided in those emails. Users who access Ubikiri Software by using certain desktop browsers may or mobile applications, with permission, receive push notifications. Notification preferences can be modified in the settings menu for the mobile application or the applicable browser.

Please note that we reserve the right to send you certain communications relating to your account or use of the Ubikiri Software (for example, administrative and service announcements) via email and other means and these transactional account messages may be unaffected if you opt-out from receiving marketing communications.

#### **10. User Please Notice:**

This Privacy Policy only applies to Ubikiri Services, and doesn't cover other websites and services that we link to.

If you go to another website from this one, read the privacy policy on that website to find out what it does with your information.

When you provide to Ubikiri the information of another person, you must obtain that person's consent to both the disclosure and the processing of that information in accordance with this Privacy Policy.

You'll always be told when the information above is being collected, and it will only be used for the purpose you provide it for.

This Privacy Policy may change from time to time. If there are any material changes to this Policy, We will notify you by email or as otherwise required by applicable law. If We need to adapt the policy to legal requirements, the new policy will become effective immediately or as required.

Your continued use of this Website, Ubikiri Services after We make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

Contact us about your privacy concerns: [hello@silentnotary.com](mailto:hello@silentnotary.com)