

# Privacy Policy

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## Introduction

The ABEY Foundation, its partners, affiliates, and developers (“We”, “Our”, “Us”) understand and respect your need for privacy. There are various ways for users (“You”, “Your”) to interact with Us, and the information You provide when doing so allows Us to improve Our services and provide the best possible experience. This privacy policy (“Privacy Policy”) explains how We collect, use and share information We collect from You through the websites and mobile applications We own and operate (Our “Sites”).

## Applicability

This Privacy Policy applies to information We collect when You use and interact with Us through Our Sites. In addition, this Privacy Policy explains the privacy practices of the Sites that link to it. Some of Our Sites may have different policies. Please read the posted Privacy Policy on each of the Sites You visit to understand how Your information is collected, used, and shared.

## Acceptance

By accessing and using Our Sites, You demonstrate Your acceptance of the terms and conditions of this Privacy Policy. Where we require Your consent to process Your personal information, We will ask You for Your consent to its collection, use and disclosure, as described further below. If You do not agree with or You are not comfortable with any aspect of this Privacy Policy, You should immediately discontinue access or use of Our Sites and services.

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## How We Collect Your Information

Information You Provide to Us: We may collect information You voluntarily provide to Us when You browse Our Sites, create an online account, purchase products or services from Us, post messages to public portions of Our Sites, sign up for newsletters or submit any other information to Us via online portals, forms, surveys or interactive features of Our Sites. The type of information We collect may include Your first and last name, mailing address, telephone number, credit card information, banking information, transactional history, correspondence, biometric data, email address, username, password, biographical information, copies of identification documents and any other information You choose to provide to Us.

Information We Collect Automatically: We may collect certain information when You browse our Sites by automated means, such as cookies, web beacons, web server logs, and other technologies.

A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to identify the user’s browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies may be used to transmit information collected through cookies back to a web server.

We may use these automated technologies to collect information about Your equipment, browsing actions and usage patterns. The information We obtain in this manner may include your device IP address, identifiers associated with your devices, types of devices connected to Our Sites, web browser characteristics, device characteristics, language preferences, referring/exit pages, clickstream data, geolocation, and dates and times of visits to Our Sites.

The information We collect through cookies and similar technologies helps Us (1) remember Your information so You will not have to re-enter it; (2) understand how You use and interact with Our Sites; (3) measure the usability of our Sites and the effectiveness of our communications; and (4) otherwise manage and enhance our Sites, and help ensure they are working properly.

Your browser may tell You how to be notified when You receive certain types of cookies or how to restrict or disable certain types of cookies. For more information, visit your browser’s or device’s documentation. Please note, however, that without cookies You may not be able to use all the features of our Sites.

Information We Collect from Third Party Sources: We may collect additional information about You from public and commercially available sources and other third parties. If You access third party services, such as Facebook, Google, or Twitter through the Sites, to log in to the Sites or to share information about Your experience on the Sites with others, We may collect information from these third party sources. We may also combine all of the information We collect and receive about You, both online and offline, and use or disclose it in the manner described in this Privacy Policy.

## How We Use Your Information

We collect this information for various purposes, including to:

- Take and handle orders, deliver products and services, process payments, and communicate with You about orders, products and services, and promotional offers;

- Communicate with You, respond to Your comments, questions and requests and to provide customer service;
- Monitor and analyze trends, usage and activities in order to operate and improve our Sites;
- Manage Your online account(s), if applicable, and send You technical notices, updates, security alerts and support and other administrative messages;
- Detect fraud and abuse in order to protect the safety and security of Our customers, Ourselves, and others;
- Send marketing and advertising communications by email or other agreed forms (including social media campaigns);
- Provide You with products and services, or information about our products and services, and to review Your ongoing needs;
- Process Your personal information for Our internal business and research purposes as well as for record keeping purposes;
- Link or combine information We collect from You with information We obtain from others to help understand Your needs and provide You with better service; and
- Carry out any other purpose for which the information was collected.

## **How We Share Your Information**

We take care to allow Your personal information to be accessed only by those who require access to perform their tasks and duties, and to share only with third parties who have a legitimate purpose for accessing it. We will never sell or rent Your personal information to third parties without Your explicit consent.

In addition, We may share Your Information in the following circumstances:

- With vendors, consultants and other service providers who need access to such information to carry out work on Our behalf;
- With financial institutions with which We partner to process payments You have authorized;
- In response to a Request for information if We believe disclosure is in accordance with any applicable law, regulation or legal process, or as otherwise required by any applicable law, rule or regulation;
- If We believe Your actions are inconsistent with the terms of Our user agreements or policies, or to protect the rights, property and security of Us or any third party;
- In connection with, or during negotiations of, any merger, sale of Our assets, financing or acquisition of all or a portion of Our business to another company;
- We may share aggregated or de-identified information, which cannot reasonably be used to identify You; and
- With Your consent or at Your direction.

## **How We Protect Your Information**

Unfortunately, the transmission of information via the internet is not completely secure. Therefore, We cannot guarantee the security of Your information transmitted to or from Our Sites and any such

transmission is at Your own risk. However, We maintain appropriate technical and organizational measures to prevent unauthorized disclosure of, or access to Your personal information. We limit access to personal information and require that employees authorized to access personal data maintain the confidentiality of that data. We also hold Our service providers to at least the same privacy and security standards to which We hold Ourselves.

## **How Long We Retain Your Information**

We will store Your personal information until it is no longer needed to fulfill the purpose(s) for which it was collected or as otherwise required or permitted by law. After such time, We will either delete or anonymize Your personal information or, if this is not possible, We will securely store Your personal information and isolate it from any further use until deletion or anonymization is possible. We may dispose of any information in Our discretion without notice, subject to applicable law.

## **Children’s Information**

Our Sites are not directed to children under the age of 18. If You become aware of any personal information We may have collected from a minor, please contact us using the information provided below. If We learn that We have collected personal information from a minor, We will take steps to delete the information without notice as soon as possible.

## **Your Choices & Rights**

You may have the right to request a copy of the personal information We have collected about You, to object to Our use or disclosure of Your information (including for marketing purposes), where applicable, to correct or update Your information, to request the deletion or restriction of Your information, or to request Your information in a structured, electronic format.

Please note that We may retain certain information as required by law or for legitimate business purposes. If You would like to exercise any of the rights to which You are entitled under applicable law, please contact Us using the information provided below.

## **California Consumer Privacy Act (“CCPA”) Statement**

If You are a California resident, the processing of certain personal information about You may be subject to the California Consumer Privacy Act (“CCPA”) and other applicable California state privacy laws. Effective January 1, 2020, the CCPA affords certain rights to California residents with respect to the processing of their personal information.

This section is intended to provide disclosures supplementary, and in addition to information contained elsewhere in this Privacy Policy and to inform You of additional rights to which You may be entitled as a California resident.

**Personal Information Collected and Processed.** This Privacy Policy sets forth above the categories of personal information that We collect and process about You, a description of each category, the sources from which We obtain each category, and how we may use and share that information.

**Requests to Exercise Your Rights.** Under the CCPA, California residents may submit a verifiable request to exercise any of the following rights with respect to their personal information.

Right to Know: Under the CCPA, You have a right to request information about Our collection, use, and disclosure of Your personal information over the preceding 12 months, and ask that We provide You with the following information:

- Categories of and specific pieces of personal information collected about You;
- Categories of sources from which We collect personal information;
- Purposes for collecting, using, or selling Your personal information;
- Categories of third parties with which We share personal information;
- Categories of personal information disclosed about You for a business purpose; and
- If applicable, categories of personal information sold about You and the categories of personal information for each third party to which the personal information was sold.

Right to Delete: You have the right to request that We delete personal information We have collected from You (and for direct Our service providers to do the same). In some instances, however, We may decline a request where an exception applies.

Right to Opt-Out: You have the right to opt-out of any future “sale” of personal information about You.

Household Requests: We currently do not collect household information. If all the members of a household make a Right to Know or Right to Delete request, We will respond as if the requests are individual requests.

Requests, Generally: The CCPA allows You to make two personal information requests in a 12-month period. To make a verifiable request pursuant to the CCPA, You may contact Us using the information provided below. If you submit a written request, please title Your request as follows or in a similar manner: "CCPA – California Resident Request". We will do Our best to respond to Your request within 30 days and, in any event, we will respond within the timescales required by applicable data protection and/or consumer privacy law. We may ask You for additional information to confirm Your identity and that We are providing access to information about the correct person.

Please note, if You do not have an account with Us, or You have not otherwise provided Us with Your personal information, We will not have enough information about You to verify Your Right to Know or Right to Delete request, as We do not keep sufficient information necessary to reidentify and link You to a prior visit to one of the Sites where data may have been collected automatically.

Requests Made Through Agents: You may designate, in writing or through a power of attorney, an authorized agent to make requests on Your behalf to exercise Your rights. Before accepting such a request from an agent, We will require the agent to provide proof of authorization to act on Your behalf.

**No Sale of Personal Information.** In the twelve months prior to the effective date of this Privacy Policy, We have not sold any personal information of consumers, as those terms are defined under the CCPA.

**No Discrimination.** We will not discriminate against any consumer for exercising their rights under the CCPA.

## **Privacy Statement for Nevada Residents**

Under Nevada law, certain Nevada consumers may opt out of the sale of “personally identifiable information” for monetary consideration to a person for that person to license or sell such information to additional persons. “Personally identifiable information” includes first and last name, address, email address, phone number, Social Security Number, or an identifier that allows a specific person to be contacted either physically or online.

We do not engage in such activity; however, if You are a Nevada resident who has provided personal information to Us, You may submit a request to Us to opt out of any potential future sales under Nevada law. To make any request under this section, please email Us from the email address associated with Your account, if applicable, using the contact information provided below. We may ask You for additional information to confirm Your identity. We will do Our best to respond to Your request within 30 days and, in any event, we will respond within the timescales required by applicable data protection and/or consumer privacy law.

## **General Data Protection Regulation (“GDPR”) Statement**

If You are an individual located in the European Economic Area (“EEA”) or the United Kingdom (collectively “EEA Residents”), the processing of certain personal information about You may be subject to the General Data Protection Regulation (“GDPR”) and other applicable privacy laws. This section is intended to provide You with disclosures supplementary, and in addition to information contained elsewhere in this Privacy Policy.

**Data Controller.** For the purposes of GDPR, the controller of Your data is The ABEY Foundation, a non-profit foundation established in Liechtenstein, which may be contacted using the information in the ‘Contacting Us’ section below. We may share Your personal information within Our corporate group of companies that are related by common ownership or control and the information may be processed by one or more of these entities. We may also share Your information with Our service providers and business partners (“Data Processors”) who process information on Our behalf, or as described elsewhere in this Privacy Policy.

**Your Rights.** You have the right to ask Us not to process your personal information for marketing purposes. You can do this conveniently at any time by clicking on the “unsubscribe” link in any marketing email You receive from Us. GDPR also gives You the right to access Your personal information, to object to the use of Your personal information for certain purposes, and the right to erase, restrict or receive a machine-readable copy of Your personal information. You can exercise any of these rights by emailing Us at the address provided in the ‘Contacting Us’ section below. We will handle Your request in accordance with the law. This means there may be legal reasons why We cannot fulfil all requests.

**Legal Bases for Processing Information.** At the time that Your personal information is collected, We rely on legal bases for processing Your information under Article 6 of GDPR. We generally only process your personal information where We are legally required to do so, where processing is necessary to perform

any contracts We entered with You (or to take steps at Your request prior to entering into a contract with You), for Our legitimate interests to operate Our business or to protect Our or Your property, rights or safety, where We have obtained Your consent to do so, or as otherwise permitted in compliance with applicable law.

**Transfers of Personal Information.** We may transfer Your personal information to Our servers, and to Data Processors who are engaged on our behalf, located in countries outside of the EEA and UK, as described above. The laws in some countries may not provide as much legal protection for Your personal information as in the EEA and UK. To the extent that We transfer Your personal information outside of the EEA and UK, We will ensure that the transfer is lawful and that Data Processors in third countries comply with the protections afforded to EEA Residents under GDPR. Using the Sites demonstrates Your consent to the processing of Your personal information as described in this Privacy Policy.

## **Changes to This Privacy Policy**

We may change this Privacy Policy from time to time. If We make changes, We will notify You by revising the date at the top of this policy, and in some cases, We may provide You with additional notice (such as adding a statement to the homepages of Our Sites or sending You an email notification). We encourage You to review this Privacy Policy whenever you interact with Us to stay informed about Our information practices and the ways You can help protect Your privacy.

## **Third Party Links**

Our Sites may contain links to other websites operated and maintained by third parties over which We have no control. Any information You provide to third party websites will be governed under the terms of each website's notices, statements, or policies and We encourage You to investigate such policies before disclosing any information to the operators of third-party websites. We have no responsibility or liability for the content, actions or policies of third party websites. The inclusion of links to third party websites on our Sites in no way constitutes an endorsement of such websites' content, actions or policies.

## **Contacting Us**

To submit questions regarding this Privacy Policy, or to exercise any rights relating to Your personal information, please contact Us by email at [contact@abey.org](mailto:contact@abey.org) or by mail to the ABEY Foundation's mailing address at:

ABEY FOUNDATION  
122 Mary Street  
George Town, Grand Cayman  
KY1 - 1206, Cayman Islands