

## **MyEosWallet Privacy Policy**

**MyEosWallet** introduces this Privacy Policy (the “**Policy**”) to provide you with the transparent and comprehensive information on privacy matters within the use of the functionality available at the Website <https://myeoswallet.one> and at MyEosWallet Mobile Application.

In particular, this Privacy Policy explains when, where, and why we collect personal data of our users, how we use such data, the conditions under which we may disclose it to others, your rights in respect of your personal data, and how we keep it secure. Before you give us your consent on the collection and processing of your personal data, or provide us with your personal data, we kindly ask you to read carefully this Privacy Policy.

This Privacy Policy constitutes a legally binding agreement between you and MyEosWallet.

We offer a free, open-source, client-oriented interface/platform for transferring EOS & Tokens (the “**Services**”). This Policy applies to your use of the Services. More details on this are stated in our Terms of Use.

Please pay attention to that by accepting this Policy you expressly consent that your personal data may be transferred outside the European Economic Area (the “**EEA**”), since certain contractors of MyEosWallet are based within the jurisdictions that generally may not have as extensive data protection as it is present within the EEA. Nevertheless, MyEosWallet adapts the security and organizational safeguards to make any personal data transfer compliant with the applicable data protection laws, including the GDPR.

### **1. What data does MyEosWallet process and why?**

The first thing you need to know is that the personal data is any information relating to you and which alone or in combination with other pieces of information gives the opportunity to identify you as an individual. It can be your name, your identification number, your location data. It also includes the information about your activities within the Services, particularly the information automatically collected. Please note that anonymous data cannot be considered as personal. We may process such anonymous data at our own discretion, for example, for some statistical purposes.

Overall, we may process your contact and financial information, AML|KYC-related data, cookie identifiers and other similar technologies data. In-depth the list of personal data processed is explained below. Generally, this data is processed for two main connected functions, i.e. the Website and the Mobile Application performance and functionality as well as the Services provision. By extension, we together with our contractors and partners process such data for marketing and advertising purposes.

### **2. Data collected automatically**

When you use the Services, we collect information sent to us by your computer or mobile device or other access device. The information sent to us includes, but is not limited to, the following:

IP-Address, your device model, screen resolution and operation system. We process the data described in this Section in order to improve and optimize the work of our Platform, in order to understand your needs and to provide the Services that are relevant to you.

Please note that automatically collected data is mostly anonymized and does not enable us to identify any specific individual. If such data is not anonymous, we will ask you for the consent before we start collecting such data. You provide us with your consent by means of: clicking “OK” on Cookie Policy Notification and/or filling your personal data in the application forms on the Website.

We may collect the above-listed data through cookies, pixel tags, and similar technologies that create and maintain unique identifiers. We engage the service of Google Analytics to collect and process it:

**Google Analytics.** With the use of Google Analytics, we collect such data as IP-Address, your device model, screen resolution and operation system, session durations, your location. Based on this data, we analyze your needs and interests, evaluate effectiveness of our campaigns and improve our website to make its content relevant to you and the website itself – available for smooth viewing with your device. Furthermore, we use this data for advertising campaign.

Some of the automatically collected data are collected through cookies and other similar technologies. Cookies are tiny pieces of code that remain in your device after you have visited some website. Next time, these pieces enable the server to provide you with the customized information. By giving your consent to MyEosWallet for using your cookies you make our Platform more efficient, fast, and safe, you improve its functioning. Nevertheless, you may block, delete, or disable saving cookies on your device if your web-browser allows to do this. Please, refer to our Cookies Policy for additional information on how MyEosWallet uses cookies and other similar technologies.

We store your automatically collected data for no longer than two years. Such data may be further processed by MyEosWallet only for statistical purposes and in the form that does not allow identification of any person.

### **3. Information you submit or have to submit while using the Services**

#### *a. Registration on the Platform*

You may initially create an account on our Platform or attach your existing account on *Scatter* or *Ledger Nano S*. In order to create the account, you need to submit your e-mail and create a password. When you attach your Scatter or Ledger Nano S to the account on our Platform, you authorize us to perform the verification and obtain the necessary data from the Scatter or Ledger. Such data includes your personal key that allows us to process the transaction. We collect and process such data in order to run your account and provide you with the Services you expressly requested, in particular to process transactions and send notifications about such transactions, as well as to verify your identity.

Please note that you must have Scatter installed to safely and securely send transactions to the EOS Network.

In addition, for the fraud detection purposes, we may also evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

The contractual basis applies to such processing. Without this data we will not be able to provide you with the main Services of our Platform as it is prescribed in our Terms of Use.

You can edit your personal data and/or delete your account by sending a request at [myeoswalletsup@gmail.com](mailto:myeoswalletsup@gmail.com). If you delete your Account, we will mark your account in our database as "Closed," but may retain personal data from your account for 5 (five) years from the date of the account closure to comply with KYC|AML framework, to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our Terms of Use, or take other actions as required or permitted by law.

#### *b. Financial transactions and AML|KYC-related data*

When you use the Services, you will be engaged in financial transactions. As a result, we may process financial information, including data regarding your transactions and other data connected with selling and purchasing of digital assets within the Services.

In order to meet three related legal obligations, namely to (i) comply with the applicable AML (Anti-Money Laundering) | KYC (Know Your Customer) laws and regulations, (ii) process financial transactions, (iii) verify your identity, MyEosWallet processes the following data in accordance with the internal data security procedures:

- personal data directly related to your identity with the respected documents supporting such information;
- data related to your place of residence with the respected documents supporting such information;
- data necessary for other checks and procedure in connection with AML|KYC (to prove source of funds, check sanction lists etc.);
- other data requested by AML|KYC providers to verify your identity.

In the light of financial transactions flow within the Services, MyEosWallet and its contractors (any other third parties) may be legally bound to retain such data for the definite period of time, specified in different documents. In particular, MyEosWallet may be bound to retain all the copies of your personal data (all forms and authorizations obtained from your) for a minimum of five years from the date of inquiry to disclose them for AML|KYC purposes.

#### *c. Data from your requests and communications with MyEosWallet*

When we receive a request or complaint from you, we collect the data you provided us with in such enquiry. It normally includes your name, surname and other details. We will use such personal data only in order to process the request or complaint, check on the level of our services and provide you with the comprehensive response. Such data will be processed on the contractual basis as we will use it to provide you with information you have intentionally requested. Without this data we will not be able to consider your issue and give you a response regarding it.

The personal data relating to your enquiry will be stored for no longer than two years of the moment when the issue is resolved.

#### **4. Sensitive Data**

Sensitive data includes data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a sex life or sexual orientation. MyEosWallet does not collect or process any sensitive data.

#### **5. Personal Data of Minors**

We are concerned about the privacy of children. Pursuant to our Terms of Use, we provide the Services only to those individuals, who have full legal capacity for civil rights and conducts and at 18 or more years old.

#### **6. Other processing**

Note that we may process your personal data not only on the basis of your consent or at your request, but also when the processing is necessary:

- for compliance with our legal obligations;
- to protect your vital interests or vital interests of another natural person;
- for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

In all cases, we will notify you about the applied legal basis for processing and other relevant details, before we start processing of your personal data on the specific legal basis. However, we will not if we are forbidden to do so in accordance with our obligations under any applicable legislation.

If MyEosWallet decides to change the purposes of processing specified above, we will inform you on such changes prior to the use of your personal data within the newly set purposes. The notification on such changes will be sent to your email and you will have to provide your consent for the amended purposes (unless additional purpose of processing is compatible with those listed above).

#### **7. How does MyEosWallet process the data collected?**

The processing of your personal data within MyEosWallet is limited to the purposes identified in this Policy.

We do not sell or rent your personal data to third parties for their marketing purposes without your explicit consent. We may combine your information with information we collect from other companies and use it to improve and personalize the Services, content, and advertising.

We respect your communication preferences. If you no longer wish to receive notifications via our application, you can adjust your preferences by visiting the settings page of the application.

We also do not make any decisions based solely on automated processing, which produce legal effects concerning you or similarly significantly affect you.

## **8. How does MyEosWallet protect and store your data?**

Please note your personal data is stored in your device. As far as practicable we protect your data using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.

Please note that the transmission of any data over the Internet using personal computers or mobile devices is not completely safe and therefore we cannot guarantee the security of documents or information submitted to our Platform. Any transmission of such documents when it is performed towards the Platform is at your own risk. As soon as we receive your personal data, we implement strict security measures and procedures to avoid unauthorized access from any third party.

## **9. How do we share your personal data and why?**

We may share your personal data in the following manner and for the following purposes:

***For Services Provision.*** In order to provide you with the high-quality services, MyEosWallet hires people, enters into agreements with independent contractors as well as cooperates with other services providers, companies and organizations. For that reasons, some of your personal data can be passed to the mentioned persons.

First of all, our employees may have access to your data. Then, we may transfer your data to our sub-contractors and affiliates. We secure such transmission by including standard contractual clauses adopted by the European Commission and compliant with the EU data protection laws into our data processing agreements. When providing us your personal data you agree to such transfer and processing within the purposes set in this Privacy Policy.

***For Legal Reasons.*** We may disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims or within the AML/KYC procedures. We may also share such data if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Use, or as otherwise required by law.

In certain situations, we may be required to disclose your personal data to law-enforcement agencies or similar authorities in order to comply with anti-money laundering and counter-terrorist financing verification requirements, as well as to meet national security or law enforcement requirements. Legal requests must meet the following requirements before we will consider complying with them: (i) must be in writing and legally issued by a relevant governmental entity; (ii) must be as narrowly defined as possible.

***For Business Transactions.*** MyEosWallet may be involved in a merger, acquisition, or sale of all or a portion of its assets. In such a case, you will be notified via email and/or a prominent

notice on our Platform of any change in ownership or uses of your personal data, as well as any choices you may have regarding your personal data.

**For Statistical Analysis.** MyEosWallet may create and share with third parties the anonymous statistics about our customers, sales, traffic patterns, and related Platform information.

**For Transaction Flow.** MyEosWallet may disclose your personal data to the third parties involved in the execution of transactions, including but not limited to our banking partners, transactions facilitators and payment providers.

**For analytical purposes.** MyEosWallet may use the following services to collect, manage, analyze or otherwise process some of your personal data, in particular:

- **Google Analytics.** Through our Platform, we use this service and its reports in order to better understand the website traffic and webpage usage. Google LLC provides MyEosWallet with the services of Google Analytics. The company is located in the United States of America and complies with the requirements of the [EU-US Privacy Shield](#). Here is some information on data protection practices of Google LLC: <https://cloud.google.com/security/compliance/gdpr/>

## 10. Your rights

### **You have a right to access to your personal data processed by MyEosWallet and right to data portability.**

This means that you can ask MyEosWallet what personal data of yours is being processed. You can also ask for the clarifications on the information described above, i.e. purpose of collecting and processing, period of processing, third parties which have access to information. You have a right to request from MyEosWallet your personal data in a structured, commonly used and machine-readable format. You also have the right to transmit this data to another controller, if the processing is based on your consent or on contract and the processing is carried out by automated means.

### **You have a right to request from MyEosWallet to rectify your personal data.**

This means you can require all the inaccurate personal data concerning you being corrected. You can also complete the personal data if you feel there is a need to do so.

### **You have a right to request from MyEosWallet to erase personal data.**

You can request MyEosWallet to erase personal data if its processing is no longer necessary in relation to the purposes for which it was collected as well as if there are no legal grounds for the processing. In most cases MyEosWallet will erase it unless otherwise required by legislation.

### **You have a right to restrict the processing of your personal data by MyEosWallet.**

In some cases, prescribed by law you will be able to restrict the processing of your personal data, for example, if you contest the accuracy of your personal data being processed or in case MyEosWallet is not interested in processing of your personal data any longer, but you want MyEosWallet to do this on different reasons, for example, to bring some claim for somebody and, instead of the erasure of information, its processing will be just restricted.

### **You have a right to withdraw your consent.**

You can withdraw your consent for the collection and processing of your personal data by MyEosWallet at any time by contacting us, without affecting the lawfulness of processing based on consent before its withdrawal. After we at MyEosWallet receive such withdrawal request from you, we will process it in a timely manner and we will no longer process your personal data unless otherwise is set by law.

### **You have a right to object to processing of your personal data by MyEosWallet.**

In some cases, prescribed by the applicable laws you can object to processing of your personal data.

You have a right to object to processing of your personal data when the processing is related to the performance of our task carried in the public interest or in the exercise of official authority vested in us; or we process your data to pursue our or third party's legitimate interests, and you believe that such interests are overridden by your interests or fundamental rights and freedoms.

If you make a request objecting to processing, we will no longer process the personal data unless we are able to demonstrate compelling legitimate grounds for the processing.

Please note that when processing of your personal data is carried for direct marketing purposes, you have the right to object at any time to such processing without providing any justification. We will no longer process your data for such direct marketing purposes. You may refer relevant sections of this Privacy Policy to learn whether we process your data for direct marketing purposes.

### **How to exercise your rights as to your personal data?**

Any requests to exercise your rights can be directed to MyEosWallet through the contact details provided below. These requests are free of charge.

#### **11. Time for reply and reaction**

MyEosWallet will provide information on action taken on your request related to your rights specified above within one month of receipt of the request for the longest. That period may be extended by two further months if MyEosWallet is overwhelmed by the number of requests or the request at issue is complicated and requires a lot of action. MyEosWallet will inform you of any such extension within one month of receipt of the request, together with the reasons of such delay.

If you have doubts as to our reply or reaction, or absence of such, you have the right to lodge a complaint with a supervisory authority that is empowered to process such complaints in your country.

#### **12. Breach Notifications**

If any personal data of yours would be under the breach, we would inform you and the respective data protection agencies as to the accidents without undue delay, if there are high risks of violation of your rights as data subject. We would also do our best to minimize any such risks.

#### **13. Policy changes**

You may be sure that there will be no radical and profound changes regarding your privacy.

Still, we may change this Policy from time to time, bearing in mind our privacy commitments before each individual and society overall. To make sure that we do not abuse your trust, please, periodically check this page to ensure that you are satisfied with any changes. Additional notifications on any amendments will be sent to your account and/or your email address.

We hope this Privacy Policy helped you understand how your personal data is dealt with at MyEosWallet. We will make our best efforts to protect your personal data. Should you have any questions or requests, you can always e-mail us at [myeoswalletsup@gmail.com](mailto:myeoswalletsup@gmail.com) . We will be glad to receive any information or comments from you to make our services better and improve our data protection policies.

Your MyEosWallet team

Contact email: [myeoswalletsup@gmail.com](mailto:myeoswalletsup@gmail.com)