

## FLOWTY PRIVACY POLICY

**Effective Date:** March 29, 2023

Flowty (“**Flowty**,” “**we**,” “**us**” or “**our**”) recognizes the importance of protecting the privacy of the users of our service. It is our intent to balance our legitimate business interests in collecting and using information received from and about you with your reasonable expectations of privacy. The following privacy policy (“**Privacy Policy**”) is the way we handle information learned about you from your visits to our website available at <https://flowty.io/> (the “**Site**”) and/or use of our service (the **Site** and the service therein collectively referred to as the “**Service**”).

**PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY.** When you submit information to or through the Service, you consent to the collection and processing of your information as described in this Privacy Policy. By using the Service, you accept the terms of this Privacy Policy and our [Terms of Use](#). If you use the Service, information that may be considered personally identifiable will be processed and potentially stored in the United States.

**USE OF BLOCKCHAIN TECHNOLOGY.** Our Service utilizes blockchain technology, which permanently records transaction data across wide networks of computer systems. As such, any information that is published on the blockchain is generally incapable of deletion. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of personal information, especially when blockchain data is combined with other data. To the extent we are required to correlate any of your personal information published on the blockchain with information you provide directly to us through your use of the Service (e.g., your email), we will only use such information as provided in this Privacy Policy.

### **Personal Information**

Flowty collects personal information from you when you interact with the Service. This information is collected and stored electronically by us. This information may be provided to us voluntarily by you, as well as collected automatically by us from you.

#### 1. Information Voluntarily Provided By You

We collect information about you when you use the Service, including information you provide when you register an account or digital wallet, access content made available on the Service, make a purchase, participate in a promotion, or contact customer support. Such information includes:

- **Contact Data**, in the form of your email address and other contact information you provide.
- **Digital Wallet Information**, including your digital wallet address.
- **Transaction Event Data**, including but not limited to the date and time you made a transaction using the Service (whether as an Independent Lender or an NFT Holder (as those terms are understood in the Terms and Conditions)), the designated Loan Repayment Date and Time (as the term is understood in the Terms and Conditions), fee information related to the respective transaction, and hashed information on the blockchain that is part of the respective transaction.

- **Content**, including any content in messages you may send to us.

You may choose to voluntarily provide other information to us that we do not request, and, in such instances, we have no control over what categories of personal information such disclosure may include. Any additional information provided by you to us is provided at your own risk.

## 2. Information Collected Automatically

Flowty also collects certain personal information about you automatically when you use the Service. This information includes information about your computer hardware, software, and network when you use the Service. This information may include: your IP address, browser type, domain names, access times, geographic location, referring website addresses and other technical information such as protocol status and substatus, bytes sent and received, and server information. We may also collect information about how you interact with the Service. This information is used by us for our business purposes, for the operation and improvement of the Service, for technical troubleshooting, to maintain quality of the Service and to provide general statistics regarding use of the Service.

### **Cookies and Other Information Collection Tools**

***What are cookies?*** A cookie is a small file containing a string of characters that is sent to your computer when you visit a website or use an online service. When you visit the website or use the service again, the cookie allows that website or online service to recognize your browser or device. Cookies may store unique identifiers, user preferences and other information.

***Duration of Cookies.*** We may use “session cookies” or “persistent cookies.” Session cookies are temporary and expire once you close your browser or once your session ends. Persistent cookies remain on your device for much longer or until you or your browser erase them. Persistent cookies have varying durations that are dependent on their expiration date.

***Why do we use them?*** Cookies help us improve the Service by providing us with information about which parts of the Service are most popular, enabling us to analyze technical and navigational information about the Service, and helping us to detect and prevent fraud. We also use cookies and other data collection tools (such as web beacons and server logs) to help improve your experience with the Service. The information generated by the cookie about your use of the Service (including IP address) is transmitted to our data collection tool service providers. This information is then used by us to evaluate visitors’ use of the Service and to compile statistical reports on website activity for Flowty. If you would like to opt-out from the use of your information by Google analytics, you may use [Google’s analytics opt-out browser add-on](#) designed for this purpose.

### **How Information is Used**

We may use the information we collect for any of the following purposes:

- to provide the Service to you and to improve the Service;
- update users of transaction time-tables, expiration periods, and due dates to repay any loan that may have been obtained as part of a respective transaction;
- to operate, improve, and personalize the products and functionality included in the Service, and to give each user a more consistent and personalized experience when interacting with us;

- to market our Service and provide you with information about products and functionality that we think may be of interest to you;
- for customer service, security, to detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Service;
- for research and analysis purposes;
- to fulfill any obligations related to Flowty's smart contract or the Terms of Use; and
- to communicate with you.

### Sharing of Information

- **With Third Party Service Providers Performing Services on Our Behalf.** We share your personal information with our service providers to perform the functions for which we engage them. For example, we may use third parties to host the Service or assist us in providing functionality of the Service, provide data analysis and research on the use of the Service, and send out email updates about the Service.
- **For Legal Purposes.** We also may share information that we collect from users as needed to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose personal information as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or any other legal or regulatory process. We may also share personal information as required to pursue available remedies or limit damages we may sustain.
- **Blockchain Platform.** When you engage in a transaction that is recorded on the blockchain, certain information that may be considered personal information related to that transaction will be published on the blockchain and may be accessible to third parties not controlled by Flowty.
- **Changes of Control.** We share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition, business combination of all or any portion of our business or assets, change of control, or a transfer of all or a portion of our business or assets to another third party (including in the case of any bankruptcy proceeding).

Flowty does not share your personal information with third parties for those third parties' direct marketing purposes.

### Security Used & Retention of Personal Information

Flowty uses reasonable security measures designed to prevent unauthorized intrusion to the Service and the alteration, acquisition or misuse of personal information that Flowty directly controls, however, we will not be responsible for loss, corruption or unauthorized acquisition or misuse of personal information that you provide through the Service that is stored by us, or for any damages resulting from such loss, corruption or unauthorized acquisition or misuse. It is your responsibility to protect the security of your Digital Wallet Information. We will retain your personal information for as long as necessary to fulfill the purpose for which it was collected, or as required by applicable laws or regulation.

### Links to External Websites

Our Service may contain links to third party websites. Any access to and use of such third party websites is not governed by this Privacy Policy, but is instead governed by the privacy policies of those third party websites, and we are not responsible for the information practices of such third party websites.

## **Your Rights and Choices**

### **1. Tracking Technology Choices**

**Do Not Track:** Our Service does not currently take any action when it receives a Do Not Track request. Do Not Track is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on Do Not Track, visit [www.donottrack.us](http://www.donottrack.us).

**Cookies:** Web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to manage and delete cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Some web browsers provide settings that allow a user to reject cookies or to alert a user when a cookie is placed on the user's computer, tablet or mobile device. Most mobile devices also offer settings to reject mobile device identifiers. Although users are not required to accept cookies or mobile device identifiers, blocking or rejecting them may prevent access to some features available through the Service.

### **2. Communications**

**E-mails.** You can opt-out of receiving promotional emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link, or emailing us at the email address set out in the "Questions/Contact Us" section below with the word UNSUBSCRIBE in the subject field of the email. Please note that you cannot opt-out of non-promotional emails, such as those about your account, transactions, servicing, or Flowty's ongoing business relations.

### **Children**

We do not knowingly collect or maintain personal information from any person under the age of thirteen. No parts of our Service are directed to or designed to attract anyone under the age of thirteen.

### **Questions / Contact Us**

If you have any questions regarding this Privacy Policy, please contact us at [info@flowty.com](mailto:info@flowty.com).

### **Notification of Changes**

Any changes to our Privacy Policy will be posted to this page so users are always aware of the information we collect and how we use it. Accordingly, please refer back to this Privacy Policy frequently as it may change.