

FINNEY Wallet by SIRIN LABS Privacy Policy

Introduction

SIRIN LABS AG ("us", "we" or "Company") respect the privacy of our users (each, "you" or "User") and are committed to protect the privacy of Users who access, download, install, register, use or engage with our mobile application (the "Application"), our token conversion service or any other online services we provide (collectively: the "Services").

The Company has prepared this Privacy Policy to outline our practices with respect to collecting, using and disclosing your information when you use the Services.

We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By using the Services, you agree to the terms of this Privacy Policy and your continued use of the Services constitutes your ongoing agreement to the Privacy Policy.

The Privacy Policy is a part of the [Terms of Service](#) and is incorporated therein by reference.

In this Privacy Policy you will read about, among other things:

- **What type of information we collect**
- **How we use the information**
- **With whom we share the information and for what purpose**
- **International transfer**
- **For how long we retain the information**
- **Your privacy rights**
- **How we protect your information**
- **Minors**
- **How to contact us**

What type of information we collect

We may collect two types of data and information from our Users.

The first type of information is un-identified and non-identifiable information pertaining to you, which may be made available or gathered via your use of the Services ("**Non-personal Information**"). We are not aware of the identity from which the Non-personal Information is collected. Non-personal Information which is collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information about your device, in order to enhance the functionality of the Services. When you register to the Services through the Application, we may also collect from you the wallet's public address of the selected cryptocurrency.

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual ("**Personal Information**"). Such information may include:

- **Account Information:** When you sign-up and register to the Services, you may be asked to provide us certain details about yourself. You may register to the Services directly through the Application.
- **Voluntarily Information:** We may collect information which you provide us voluntarily. For instance, when you respond to communications from us, communicate with us via email or share additional information about yourself through your use of the Services. We may also collect the feedback, suggestions, complaints and reports which you send to us. Please note that we may also collect complaints about you from other Users, which may include your Personal Information.

For avoidance of doubt, if we combine Personal Information with Non-personal Information, the combined information will be treated as Personal Information as long as it remains combined.

How we use the information

We use and share Personal Information in the manners described in this Privacy Policy. In addition to the purposes listed above, the information we collect, which may include your Personal Information, is used for the following purposes:

- To set up your account and to provide the Services;
- To identify and authenticate your access to certain features of the Services;
- To send you relevant push notifications concerning the conversion request status (e.g., pending, confirmed, rejected);
- To communicate with you and to keep you informed of our latest updates;
- To perform a research or to conduct analytics in order to improve and customize the Services to your needs and interests;
- To support and troubleshoot the Services and to respond to your queries;
- To investigate and resolve disputes in connection with your use of the Services;
- To detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the Services; and
- To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request.

With whom we share the information and for what purpose

We do not rent, sell, or share your Personal Information with third-parties except as described in this Privacy Policy.

We may share Personal Information with the following recipients: (i) our subsidiaries; (ii) affiliated companies; (iii) subcontractors and other third-party service providers; (iv) auditors or advisers of our business processes; and (v) any potential purchasers or investors in the Company.

In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our recipients for any of the following purposes: (i) storing or processing Personal Information on our behalf (e.g., cloud computing service providers); (ii) processing such information to assist us with our business operations; and (iii) performing research, technical diagnostics, personalization and analytics.

We may also disclose Personal Information, or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies, including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our affiliates, our Users, yourself or any third-party; (vi) for the purpose of collaborating with law enforcement agencies; and (vii) in case we find it necessary in order to enforce intellectual property or other legal rights.

International transfer

Since we operate globally, it may be necessary to transfer data, including Personal Information, to countries outside the European Union. The data protection and other laws of these countries may not be as comprehensive as those in the European Union – in these instances we will take steps to ensure that a similar level of protection is given to Personal Information, including through adequate contractual measures. You hereby consent to the transfer of Personal Information to countries outside the European Union.

Third-party collection of information

Our Privacy Policy only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties via the Services (e.g., by clicking on a link to any other website or location) or via other sites throughout the Internet, different rules may apply to their use or disclosure of the information you disclose to them.

You acknowledge that we are not responsible for the products, services, or descriptions of products or services that you receive from third-party sites or to the content or privacy practices of those sites, and that this Privacy Policy does not apply to any such third-party products and services. You are knowingly and voluntarily assuming all risks of using third-party sites to purchase products and services. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

For how long we retain the information

We retain the information we collect from you for as long as needed to provide our Services and to comply with our legal obligations, resolve disputes and enforce our agreements (unless we are instructed otherwise). We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

Your privacy rights

Certain jurisdictions provide Users with certain statutory rights to their Personal Information. Subject to exemptions provided by law, and with proper identification, you may have the right to certain actions to your Personal Information such as:

- Right to verify your Personal Information (to access, delete, change or update any Personal Information relating to you. For example, if you believe that your Personal Information is incorrect, you may ask to have it corrected or deleted);
- Right to see what Personal Information about you we have;
- Right to request that we erase Personal Information about you (subject to any other legal obligation that may require us to keep that information);
- Right to restrict us from processing Personal Information pertaining to you (for example, you may request that we will stop using or sharing your Personal Information with third-parties); and
- Right to export Personal Information in a portable format;

If you wish to exercise any of these rights, contact us at: contact@sirinlabs.com. When handling your request, we will ask for additional information to confirm your identity (which may include Personal Information). However, please note that if you choose not to allow us to process your Personal Information, we may be prevented from providing our Services (among other things, regarding transactions you attempt to complete).

If you wish to raise a complaint on how we have handled your Personal Information, please contact us directly at contact@sirinlabs.com.

If you are not satisfied with our response or believe we are collecting or processing your Personal Information not in accordance with the laws, you can complain to the applicable data protection authority.

How we protect your information

We take great care in implementing and maintaining the security of the Services and safeguarding information which relates to you. We employ industry standard procedures and policies to ensure the safety of your information and prevent unauthorized use of any such information. Although we take reasonable steps to safeguard such information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

If you believe that your privacy was not treated in accordance with our Privacy Policy, or if any person attempted to abuse our Services or acted in an inappropriate manner, it will be advisable to contact us directly at contact@sirinlabs.com.

Corporate transaction

We may share information that relates to you, including Personal Information, in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale of an asset or transfer in the operation thereof) of the Company. In this event, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy.

Minors

The Services are not designated to individuals under the age of 18. If you are under 18 years old, you should not download the Application, use the Services, or provide any Personal Information to us.

We reserve the right to access and verify any Personal Information collected from you by us. In the event that we become aware that an individual under the age of 18 has shared any information, we will discard such information. If you have any reason to believe that a minor has shared any information with us, it will be advisable to contact us at contact@sirinlabs.com.

Updates or amendments to the Privacy Policy

We may revise this Privacy Policy from time to time, in our sole discretion, and the most current version will always be posted on our website or Application (as reflected in the "Last Revised" heading). In the event of a material change to the Privacy Policy, we will notify you through the Services or via email, or you may be notified within the Application. We encourage you to review this Privacy Policy regularly for any changes.

Your continued use of the Services, following the notification of such amendments, constitutes your acknowledgement and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

How to contact us

If you have any general questions regarding the Services or the information that we collect about you and how we use it, please contact us at contact@sirinlabs.com.

Information about us

The details of the Company are as follows:

SIRIN LABS AG
Moserstrasse 48, 8200 Schaffhausen
Switzerland