DeNet Storage App Privacy Policy

This Privacy Policy was last updated on November 5, 2022

Thank you for using DeNet Storage App, run by Defender Software FZ-LLC ("DeNet Storage", "we", "us", "our"). We respect your privacy and want you to understand how we collect, use, and share data about you. This Privacy Policy covers our data collection practices and describes your rights to access, correct, or restrict our use of your personal data.

Unless we link to a different policy or state otherwise, this Privacy Policy applies when you use the DeNet Storage – the first-of-a-kind app allowing you to store your files safely and confidently based on the decentralized DeNet Storage Protocol, and its functionality ("Services").

By using the Services, you agree to the terms of this Privacy Policy. You shouldn't use the Services if you don't agree with this Privacy Policy or any other agreement that governs your use of the Services.

1. What Data We Get

We try to collect as minimum as possible of data from you directly, like the information you might enter yourself. We also collect some data automatically, like information about your device and what parts of our Services you interact with or spend time using.

1.1. Data You Provide to Us

We may collect different data from or about you depending on how you use our Services. Below are some examples to help you better understand the data we collect.

When you use our Services, we collect any data you provide directly, including:

- Sweepstakes, Promotions, and Surveys: We may invite you to complete a survey or participate in a promotion (like a contest or challenge), either through our DeNet Storage or a third-party platform. If you participate, we will collect and store the data you provide as part of participating, such as your email address, and/or digital wallet address. That data is subject to this Privacy Policy unless otherwise stated in the official rules of the promotion or in another privacy policy. The data collected will be used to administer the promotion or survey, including for notifying winners and distributing rewards. To receive a reward, you may be required to allow us to post some of your information publicly (like on a winner's page). Where we use a third-party platform to administer a survey or promotion, the third party's privacy policy will apply.
- Communications and Support: If you contact us for support or to report a problem or concern (regardless of whether you have created an account), we might collect and store your contact information, messages, and other data about you like your name, email address, messages, location, and any other data you provide or that we collect through automated means (which we cover below). We use this data to respond to you and research your question or concern, in accordance with this Privacy Policy.

The data listed above is stored by us and associated with you.

1.2. Data We Collect Through Automated Means

When you access our Services (including browsing content), we collect certain data by automated means, including:

- **System Data**: Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, domain and other systems data, and platform types;
- Usage Data: Usage statistics about your interactions with our Services, including content accessed, time spent while using Services, features used, click data, date and time, referrer, and other data regarding your use of our Services;

The data listed above is collected using server log files and tracking technologies, as detailed in the "Cookies and Data Collection Tools" section below. It is stored by us and associated with your account.

1.3. Data Retention Period

We maintain your personal data exclusively within the time needed to follow the prescribed herein legal or business purposes. When we no longer need your personal data, we securely delete or destroy it. Aggregated data, which cannot identify a device/browser (or individual) and are used for purposes of reporting and analysis, are maintained for as long as commercially necessary.

Sometimes business and legal requirements oblige us to retain certain information, for specific purposes, for an extended period of time. Reasons we might retain some data for longer periods of time include:

- Security, fraud & abuse prevention.
- Complying with legal or regulatory requirements.
- Ensuring the continuity of our Services.

1.4. International Transfers

We are entitled to transfer your personal or non-personal data to third parties abroad for the purposes of data processing. As personal data processors, they are obliged to protect data privacy to the same extent as we do. We choose the processors carefully to ensure compliance with applicable laws.

1.5. Supervisor Authority Oversight

If you are a data subject whose data we process, you may also have the right to lodge a complaint with a data protection regulator in one or more of the European Union member states. <u>Here</u> you can find a list of data protection authorities in Europe.

2. How We Get Data About You

We use tools like cookies, web beacons, and similar tracking technologies to gather the data listed above. Some of these tools offer you the ability to opt-out of data collection.

2.1. Why We Use Data Collection Tools

DeNet Storage uses the following types of Data Collection Tools for the purposes described:

Strictly Necessary: These Data Collection Tools enable you to access DeNet Storage, provide basic functionality (like accessing content), secure DeNet Storage. These are required for the Services to work properly, so if you disable them, parts of the DeNet Storage will break or be unavailable.

Functional: These Data Collection Tools remember data about your preferences, provide additional functionality, customize content to be more relevant to you, and remember settings affecting the appearance and behavior of our Services (like your preferred language, etc.).

Social Media: These Data Collection Tools enable social media functionality, like sharing content with friends and networks.

To learn more about managing Data Collection Tools, refer to Section 6.2 (Your Choices About the Use of Your Data) below.

3. What We Use Data For

We use your data to do things like provide our Services and/or content, communicate with you, troubleshoot issues, secure against fraud and abuse, improve and update our Services, analyze how people use our Services, and as required by law or necessary for safety and integrity.

We use the data we collect through your use of our Services to:

- Provide and administer our Services, including displaying customized content, and facilitate communication with other users;
- Process your requests and orders for information or features;
- Communicate with you about your account by:
 - Responding to your questions and concerns;
 - Sending you administrative messages and information; notifications about changes to our Service; and updates to our agreements;
 - Sending you information, such as by email or text messages, about rewards programs, new services, new features, promotions, newsletters;
- Solicit feedback from users;
- Market products, services, surveys, and promotions;
- Identify unique users across devices;
- Improve our Services and develop new products, services, and features;
- Analyze trends and traffic, track purchases, and track usage data;
- Advertise our Services on third-party websites and applications;
- As required or permitted by law; or
- As we, in our sole discretion, otherwise determine to be necessary to ensure the safety or integrity of our users, employees, third parties, the public, or our Services.
- 4. Who We Share Your Data With

We share certain data about you with partners and persons who may perform services for us, our business partners, analytics and data enrichment providers, your social media providers, companies helping us run promotions and surveys, and advertising companies who help us promote our Services. We may also share your data as needed for security, legal compliance, or as part of a corporate restructuring. Lastly, we can share data in other ways if it is aggregated or de-identified or if we get your consent.

We may share your data with third parties under the following circumstances or as otherwise described in this Privacy Policy:

- With Service Providers, Contractors, and Agents: We share your data with third-party companies who perform services on our behalf, like fraud and abuse prevention, data analysis, marketing and advertising services (including retargeted advertising), email and hosting services, and customer services and support. These service providers may access your personal data and are required to use it solely as we direct, to provide our requested service.
- With DeNet Storage Affiliates: We may share your data within our corporate family of companies that are related by common ownership or control to enable or support us in providing the Services.
- To Power Social Media Features: The social media features (like the Facebook Like button) may allow the third-party social media provider to collect things like your IP address and which page of the Services you're visiting, and to set a cookie to enable the feature. Your interactions with these features are governed by the third-party company's privacy policy.
- To Administer Promotions and Surveys: We may share your data as necessary to administer, market, or sponsor promotions and surveys you choose to participate in, as required by applicable law (like to provide a winners list or make required filings), or in accordance with the rules of the promotion or survey.
- For Security and Legal Compliance: We may disclose your data to third parties if we (in our sole discretion) have a good faith belief that the disclosure is:
 - Permitted or required by law;
 - Requested as part of a judicial, governmental, or legal inquiry, order, or proceeding;
 - Reasonably necessary as part of a valid subpoena, warrant, or another legally-valid request;
 - Reasonably necessary to enforce our Terms of Use, Privacy Policy, and other legal agreements;
 - Required to detect, prevent, or address fraud, abuse, misuse, potential violations of law (or rule or regulation), or security or technical issues; or
 - Reasonably necessary in our discretion to protect against imminent harm to the rights, property, or safety of DeNet Storage, our users, employees, members of the public, or our Services.
 - We may also disclose data about you to our auditors and legal advisors in order to assess our disclosure obligations and rights under this Privacy Policy.
- During a Change in Control: If DeNet Storage undergoes a business transaction like a merger, acquisition, corporate divestiture, or dissolution (including bankruptcy), or a sale of all or some of its assets, we may share, disclose, or transfer all of your data to the successor organization during such transition or in contemplation of a transition (including during due diligence).
- After Aggregation/De-identification: We may disclose or use aggregated or de-identified data for any purpose.
- With Your Permission: With your consent, we may share data to third parties outside the scope of this Privacy Policy.

5. Security

We use appropriate security based on the type and sensitivity of data being stored. As with any internetenabled system, there is always a risk of unauthorized access, so it's important to protect your password and to contact us if you suspect any unauthorized access to your account. DeNet Storage takes appropriate security measures to protect against unauthorized access, alteration, disclosure, or destruction of your personal data that we collect and store. These measures vary based on the type and sensitivity of the data. Unfortunately, however, no system can be 100% secured, so we cannot guarantee that communications between you and DeNet Storage, the Services, or any information provided to us in connection with the data we collect through the Services will be free from unauthorized access by third parties. Your password is an important part of our security system, and it is your responsibility to protect it. You should not share your password with any third party, and if you believe your password or account has been compromised, you should change it immediately and contact us with any concerns.

6. Your Rights

You have certain rights around the use of your data, including the ability to opt-out of promotional emails, cookies, and collection of your data by certain third parties. You can update or terminate your account from within our Services and can also contact us for individual rights requests about your personal data. Parents who believe we've unintentionally collected personal data about their underage child should contact us for help deleting that information.

6.1. Your GDPR Rights

Under certain circumstances, you may have a number of privacy rights concerning the use, storage, and processing of your personal data (e.g., the right to delete your data). Here is a list of privacy rights:

- right to be informed we are publishing this Privacy Policy to keep you informed as to what we
 do with your personal data. You can ask us for information regarding any data of yours that we
 keep at any time. This information concerns, among other things, the data categories we
 process, for what purposes we process them, the origin of the data if we did not acquire them
 directly from you and, if applicable, the recipients to whom we have sent your data.
- right of access you may ask us whether we process your personal data and you have the right to request a copy of the information we hold about you.
- right of rectification you have the right to correct inaccurate or incomplete data about you.
- right to be forgotten you can ask for the information that we hold about you to be erased from our system and we will comply with this request unless we will have a legitimate reason not to do so.
- right to restriction of processing where certain conditions apply, you can ask us to 'block' the processing of your data.
- right to data portability you have the right to have the data we hold about you transferred to another organization and to receive personal data in a structured, commonly used format. Please apply at <u>mobileapp@denet.pro</u> to find out whether we currently support the provision of the portable file containing personal data we process about you.
- right to object you can object to the processing of your data at any time for reasons that arise
 from your special situation provided the data processing is based on your consent or our
 legitimate interest or that of a third party. In this case, we will no longer process your data. The
 latter does not apply if we are able to prove there are compelling, defensible reasons for the
 processing that outweigh your interests or we require your data to assert, exercise or defend
 against legal claims.
- right to withdraw consent withdraw the consent you gave us with regard to the processing of your personal data for certain purposes.

• right to complain – we take your rights very seriously. However, if you are of the opinion that we have not dealt with your complaints adequately, you have the right to submit a complaint to the data privacy protection authorities responsible.

Please email at <u>mobileapp@denet.pro</u> with any questions about exercising any of the above rights. If you wish to learn more about the GDPR and your rights, the <u>Information Commissioner's Office</u> website is a reliable source.

6.2. Your Choices About the Use of Your Data

You can choose not to provide certain data to us, but you may not be able to use certain features of the Services.

- To stop receiving promotional communications from us, you can opt-out by using the unsubscribe mechanism in the promotional communication you receive or by changing the email preferences in your account. Note that regardless of your email preference settings, we will send you transactional and relationship messages regarding the Services, including administrative confirmations, order confirmations, important updates about the Services, and notices about our policies.
- Apple iOS, Android OS, and Microsoft Windows each provide their own instructions on how to control in-app tailored advertising. For other devices and operating systems, you should review your privacy settings on that platform.

6.3. Our Policy Concerning Children

We recognize the privacy interests of children and encourage parents and guardians to take an active role in their children's online activities and interests. Individuals younger than 18 years of age, but of the required age for consent to use online services where they live (for example, 13 in the US or 16 in Ireland), may not set up an account, but may have a parent or guardian open an account and help them access appropriate content. Individuals younger than the required age for consent to use online services may not use the Services. If we learn that we've collected personal data from a child under those ages, we will take reasonable steps to delete it.

Parents who believe that DeNet Storage may have collected personal data from a child under those ages can submit a request that it be removed to mobileapp@denet.pro.

6.4. Users in California

Users who are California residents have certain rights under the California Consumer Privacy Act, ("CCPA"). If you are an eligible California user, included in these rights are:

- "Right to Know" You have the right to request to know more about the categories and specific pieces of personal information that we have collected about you and access a copy of your personal information.
- "Right to Deletion" You have the right to request deletion of personal information that we have collected about you.

- "Right to Non-Discrimination" If you choose to exercise any of your rights under CCPA, DeNet Storage will treat you like all other users. In other words, there is no penalty for exercising your rights under CCPA.
- "Right to Opt-Out" You have the right to opt out of the sale of your personal information.

CCPA has a specific definition of a "sale" and while DeNet Storage does not, in the traditional sense, sell your personal information or the personal information of any of our users, we do use cookies that make non-personally identifiable information available to select third-parties.

To exercise any of these rights under CCPA, please email <u>mobileapp@denet.pro</u>. CCPA allows you to designate an authorized agent to make these requests on your behalf. For your protection, we may require that the request be sent through the email address associated with your account, and we may need to verify you and/or your agent's identity before fulfilling your request.

Additionally, for more information about the personal information we collect and how we collect it, please see the sections above entitled "What Data We Get" and "How We Get Data About You."

To learn about the business and commercial purposes for which your personal information is collected and the categories of service providers who have access to your personal information, please see the sections above entitled "What We Use Your Data For" and "Who We Share Your Data With."

Since there is no widely accepted standard for the browser-initiated Do Not Track signal, we do not currently recognize or respond to Do Not Track signals.

7. Changes to this Privacy Policy

We reserve the exclusive right to make changes to this Privacy Policy from time to time, in our sole discretion. Your continued access to and use of the Services constitutes your agreement to be bound by specific terms of this Privacy Policy posted at such time. You acknowledge and agree that you accept this Privacy Policy (and any amendments hereto) each time you access the Services in any manner. Therefore, we encourage you to review this Privacy Policy regularly as you shall be bound by it.

If, within thirty (30) days of posting changes or amendments to this Privacy Policy, you decide that you do not agree to the updated terms of the Privacy Policy, you may provide us with written notice of your withdrawal from this Privacy Policy to the email address at mobileapp@denet.pro. Upon providing us with the written notice of the withdrawal of your acceptance to this Privacy Policy, you shall no longer be authorized to access or use the Interface, and you must immediately cease doing so.