

Halo Platform Companies Privacy Policy Statement



Version 1.1

Last Updated: August 9, 2018

Halo Platform Technology S.A., located at Balboa Avenue and Aquilino de la Guardia St, 44th Floor, Suite 4405, Panama City, Republic of Panama, (the “Company”, “we” or “us”) is committed to protecting and respecting your privacy.

This policy (together with our Terms of Use terms of use and any other documents referred to in it) sets out how we use and process any personal data we collect from you, or that you provide to us. Please read the following carefully as to this issue. By visiting the website <https://haloplatform.tech>, www.halodex.io, and/or by using our Services, you are accepting and consenting to the practices described in this Policy. You agree and understand that this consent is freely given, specific for using our services and Website in accordance with this Policy, is both informed and unambiguous.

INFORMATION WE COLLECT FROM YOU

Our services are not intended for children and we do not knowingly collect data relating to children. In accordance with our Terms of Use, we restrict access to our services to only adults age 18 or older and any use by younger individuals is a violation of our Terms of Use and Privacy Policy. We will collect and process the following data about you:

Information you give us. This is information about you that you give us by filling in forms on our website haloplatform.tech, halodex.io or through our Featherlite browser, or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our sites, add products or services to a shopping cart on our sites, place an order on our sites, participate in discussion boards or other social media functions on our sites, and when you contact us on our sites and when you report a problem with our sites. The information you give us may include your name, address, e-mail address, phone number, date of birth, taxpayer identification number, a government identification document, and additional information regarding your sources of funds, website Uniform Resource Locator (URL), financial and credit card information, personal description, and free-form text. We use this information to establish your identity and ensure all user profiles are properly identity secured.

The information listed above that we may request from you serves a number of unique purposes, which may include applicable law requires such information or information is relevant to provide services to you. We remind you that you are free to choose not to provide us with the the requested information, but we may not be able to serve you as effectively or offer you all or any of our services when you do not provide the information.

For a detailed list of personal information and where we store it, you can request it at support@haloplatform.tech.

Information we collect about you. When you visit any of our sites, we will automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform;
- Information about your visit, including the full Uniform Resource Locator (URL), products you added to your shopping cart, download errors, and length of visits to certain pages; and
- We also collect and use Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is de-identified and is not considered personal data as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature of our services but the data will not identify your personal usage.

COOKIES

Our websites use cookies to distinguish you from other users of our websites. This helps us provide you with a good experience when you browse our websites and also allows us to improve our sites.

Please refer to our [Cookie Policy](#) for more information about our use of cookies

HOW WE USE THE INFORMATION

Except as described in this Privacy Policy, we will not give, sell, rent or loan any personal Information to any third party. We use information about you in the following ways:

Information you give us. We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us, to assist in carrying out transactions between you and other counterparties with whom you may trade using our services, and to provide you with the information, products and services that you request from us;
- to notify you about changes to our service;
- to ensure that content from our sites is presented in the most effective manner for you and for your computer;
- to comply with our legal and regulatory obligations;
- to prevent and investigate potentially prohibited or illegal activities, and/or violations of our posted Terms of Use;
- to resolve disputes, collect fees, and troubleshoot problems;
- for quality control and staff training;
- to enhance security, monitor and verify identity across service access, combat spam or other malware/security risks; and
- to provide you with customer support.

Information we collect about you. We will use this information:

- to administer our sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so; and
- as part of our efforts to keep our site safe and secure.

Information we receive from other sources. We will combine this information with information you give us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

You agree that we have the right to share the information you give us and the information we collect about you with selected third parties including:

- Analytics and search engine providers that assist us in the improvement and optimization of our site;
- E-commerce providers such as payment solution providers to assist us in the processing of your online purchases, donations and other payments. Such providers will have their own privacy policies which may be different than this policy.

We will disclose the information you give us and the information we collect about you to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If the Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any order, subpoena or similar legal document issued by a court, government entity or other similar organization, any contract obligation, or any other legal obligation; or to protect the rights, property, or safety of the Company or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction, money laundering issues, or criminal activity.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide us is stored on our secure servers. We use reasonable technical, administrative and physical security measures to protect your data, which include generally accepted industry standards to protect the information submitted to us during transmission and

after we have received it. Further, web- based payment transactions will be encrypted using SSL technology or other generally accepted industry standards. As a global entity, we may store, transfer, and otherwise process your personal information in countries outside of the country of your residence.

Unfortunately, storage facilities and the transmission of information via the Internet is not completely secure as evidenced by recent hacks of major institutions. We will use reasonable efforts and technology to protect your personal data, but we cannot guarantee the complete security of your data and data transmitted to our sites; any storage or transmission is at your own risk. If you have reason to believe that the security of your data has been compromised, please contact us at support@haloplatform.tech.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at support@haloplatform.tech.

Our sites may, from time to time, contain links to and from the websites of our partner networks, sponsors and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

You are entitled to review, correct, or amend your personal information, or to delete that information when it is inaccurate. You may do this at any time by logging in to your account and clicking the Profile or My Account tab. This right shall only be limited where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, where the rights of persons other than you would be violated, or otherwise runs counter to our legal obligations.

If you close your account, we will mark your account in our database as “Closed” but will keep your account information in our database for a period of time as prescribed by law, which could be as little as 5 years or as long as 7 years, depending on the purpose and regulatory requirements we must adhere to. However, if you close your account, your personal information will not be used by us for any further purposes, neither sold nor shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

EUROPE AND SWITZERLAND SPECIFIC RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data’s accuracy.
- When our use of the data is unlawful but you do not want us to erase it.
- When you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Personal Information we collect may be transferred to, and stored and processed in, the United States or any other country in which we or our affiliates, partners, or service providers maintain facilities. Upon the start of enforcement of the General Data Protection Regulation (GDPR), we will continue to ensure that transfers of Personal Information to a third country or an international organization are subject to appropriate safeguards as described in Article 46 of the GDPR.

If you are a resident of the EEA or Switzerland, you are entitled to the following rights once the GDPR becomes effective. Please note, in order to verify your identity, we may require you to provide us with Personal Information prior to accessing any records containing information about you.

The Right to Access: You have the right to obtain information about our processing of personal data and a copy of your personal data that we store.

The Right to Rectify your Data. You have the right to request that we update your personal data if it is inaccurate or incomplete.

The Right to Request Data Erasure: You have the right to have your Personal Information erased from our files if the data is no longer necessary for the purpose for which it was collected, you withdraw consent and no other legal basis for processing exists, or you believe your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.

The Right to Restrict or Object to Our Processing: You have the right to restrict or object to our processing if we are processing your data based on legitimate interests or the performance of a task in the public interest as an exercise of official authority (including profiling); using your data for direct marketing (including profiling); or processing your data for purposes of scientific or historical research and statistics.

The Right to Lodge a Complaint: You have the right to lodge a complaint about our data collection and processing actions with your data protection authority. Contact details for data protection authorities can be found on this website. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance and we will do our best to make things right.

DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy will be posted on this page and, where appropriate and available, may be sent to you by e-mail or through our websites and applications. Please check this page regularly for any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy should be addressed to compliance@haloplatform.tech.

The Halo Platform Companies