# **Privacy Policy**

# ROCKETFUEL

Confidential

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# **Privacy Policy RocketFuel**

Contact details:

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(hereinafter "RocketFuel" or "us", "our", "we", and similar expressions)

To enable you using your crypto-currencies to pay eCommerce webshops for products and/or services, RocketFuel collects, uses, and shares certain information about you.

This policy explains what we collect, with whom we share it, and how you can interact with RocketFuel in order to ensure the accuracy of the data we collect, use, and share.

The information RocketFuel collects from you helps RocketFuel better serve the online community by continually personalizing the electronic payment services RocketFuel provides.

# Information that you provide to us:

RocketFuel receives and stores all information that you enter on the eCommerce web-shops' check-out pages where the RocketFuel "Pay-with-crypto" is enabled. This includes:

The URL you are purchasing goods or services from Your Wallet provider's or crypto-currency exchange name The public key linked to your wallet Your e-mail address, Your first name, your last name, your date of birth, your phone number, your street address, your city, your zip code, Your agreement to be bound by RocketFuel' terms and conditions;

You are obligated to provide RocketFuel with accurate and up-to-date information, and failure to provide RocketFuel with such information could void any Agreement between you and the eCommerce merchant from where you are buying goods and/or services from. We use the information that you provide for such purposes as processing your purchase request, responding to customer service inquiries, loss prevention, improving our service, and allowing our clients to provide customer service and fulfill their obligations to you.

## Information that we automatically receive:

RocketFuel receives and stores certain information whenever you download web pages or send us email or forms. For example, we identify the numerical IP address assigned to your computer by your Internet Service Provider.

## Protection of RocketFuel and third parties:

RocketFuel will release data when we believe the release is appropriate to comply with the law, enforce our Agreement, and protect the contract rights of our Clients. RocketFuel passes the following data to the owner/operator of the website from which you are purchasing goods and services utilizing RocketFuel Complete:

Payment check-out page: the URL you are purchasing goods or services from, your e-mail address, your first name, your last name, your date of birth, your phone number, your street address, your city, your state, your zip code, your agreement to be bound by the merchant's terms and conditions.

#### Why we collect personal information

We use the information we collect to operate our business, provide our Services, for other purposes as permitted or required by law, and to provide you with a smooth, efficient, and customized experience. Specifically, we may use your information to:

- Provide our Services (including customer support);
- Process transactions and send notices about your transactions;
- Resolve disputes, collect fees, and troubleshoot problems;
- Communicate with you about our Services and business and to inform you of matters that are important for your account and/or use of the Sites. We also use your personal data to respond to any questions, comments or requests you filed with us and the handling of any complaints;
- Comply with applicable laws and regulations;
- Establish, exercise and defend legal claims;
- Monitor and report compliance issues;
- Customize, measure, and improve our business, the Services, and the content and layout of our website and applications (including developing new products and services; managing our communications; analyzing and enhancing our products, services, websites and apps; ensuring the security of our networks and information systems; performing accounting, auditing, invoicing, reconciliation and collection activities; and improving and maintaining the quality of our customer services);
- Preform data analysis;
- Perform risk management, including comparing information for accuracy and verify it with third parties and protect against, identify and prevent fraud and other prohibited or illegal activity, claims and other liabilities; and
- > Enforce our contractual terms.

#### How we protect and store personal information

We take the security of our information seriously. We use administrative, technical, and physical security designed to safeguard personal information in our possession, and we maintain internal policies and procedures to address our data security. We will notify relevant authorities and users in the event of a data breach, if required under applicable law.

We retain data as required or permitted by law.

#### How we share data with third parties

We may disclose the information we gather with our affiliates and third parties. For example, we may share information with:

Service providers who help with our business operations and to deliver our Services, such as cloud service providers providing cloud infrastructure; providers of ID verification solutions and other due diligence solutions; providers of customer service solutions; providers of website analytics; and providers of marketing automation platforms;

Law enforcement, government officials, regulatory agencies, our banks, and other third parties pursuant to a subpoena, court order or other legal process or requirement if applicable to RocketFuel; or when we believe, in our sole discretion, that the disclosure of information is necessary to report suspected illegal or fraudulent activity or to investigate violations of our Terms of Use; and

We may also share certain Shopper information with our Merchants, for example, in cases of suspected fraud or in connection with an ongoing investigation.

Please note that these third parties may be in other countries where the laws on processing information may be less stringent than in your country. Transfer of EU data may be subject to additional legal protections we have put in place. For more information, please see the "GDPR" section below.

#### **California Consumer Privacy Act Addendum**

At RocketFuel, we take our responsibilities under the California Consumer Privacy Act ("CCPA") seriously. If you are a California resident, the following provisions apply to our processing of information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household subject to the CCPA. For such residents, the provisions of this CCPA Addendum prevail over any conflicting provisions in our RocketFuel Privacy Notice.

#### **California Personal Information We Collect**

We collect personal information in different categories and we share these Personal Information with third parties including:

- Service Providers
- Crypto-exchanges

- > Wallet providers
- Banks
- Analytics providers
- Law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other applicable legal process or requirement; and merchants in cases of suspected fraud or in connection with an ongoing investigation.

# Sale and Disclosure of California Personal Information

We do not disclose personal information of individuals to third parties for monetary or other valuable consideration. We do not sell your Personal Information or misuse them for marketing purposes.

# Use of California Personal Information

For the California Personal Information that we collect for business purposes we may use your information include:

- Audits and reporting relating to particular transactions and interactions, including online interactions, you may have with us or others on our behalf;
- Detecting and protecting against security incidents, and malicious, deceptive, fraudulent or illegal activity, and prosecuting the same;
- Debugging to identify and repair errors in our systems;
- Short-term, transient use including contextual customization of ads or website;
- Providing services on our behalf or on behalf of another, including maintaining or servicing accounts, providing customer service, fulfilling transactions, verifying identity information, processing payments, and other services;
- > Conducting internal research to develop and demonstrate technology; and
- Conducting activity to verify, enhance, and maintain the quality or safety of services or devices which we may own, control, or provide.
- We may also use the information we collect for our own or our service providers' other operational purposes, purposes for which we provide you additional notice, or for purposes compatible with the context in which the California Personal Information was collected.

# Your California Rights

If you are a California resident, you have certain rights related to your California Personal Information. You may exercise these rights free of charge except as otherwise permitted under applicable law. If you wish to submit a request under the CCPA, please do so by sending an email to: legal@rocketfuelblockchain.com or legal@rocketfuel.inc

#### Right to Access/Know. You have the right to request that we disclose to you:

- the categories of California Personal Information we have collected about you
- the categories of sources from which the California Personal Information is collected;
- > our business or commercial purpose for collecting or selling California Personal Information;

- > the categories of third parties with whom we share California Personal Information; and
- > the specific pieces of information we have collected about you.
- > We do not sell your California Personal Information.

<u>Right to Delete.</u> You have the right to request that we delete California Personal Information about you which we have collected from you.

<u>Verification</u>. As required under applicable law, we may take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may require you to provide information to verify your identity in response to exercising requests of the above type, including name and account information. We may limit our response to your exercise of the above rights as permitted under applicable law.

<u>Nondiscrimination</u>. Subject to applicable law, we may not discriminate against you because of your exercise of any of the above rights, or any other rights under the California Consumer Privacy Act, including by:

- Denying you goods or services;
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- > Providing you a different level or quality of goods or services; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.
- Changes to this Notice
- We may amend this Notice at any time by posting a revised version on our website. The revised version will be effective at the time we post it. You are responsible for periodically reviewing this Notice.

#### GDPR

Under the GDPR and relevant implementation acts, individuals have statutory rights related to their personal data. One key right is the **Right to object**. You have the right to object to processing of your personal data where we are relying on legitimate interests as our legal basis. Under certain circumstances, we may have compelling legitimate grounds that allow us to continue processing your personal data.

Other rights are as follows:

- **Right to withdraw consent.** Insofar as our processing of your personal data is based on your consent (see above), you have the right to withdraw consent at any time.
- **Right of access.** You have the right to request access to your personal data.
- **Right to rectification.** You have the right to request rectification of the personal data that we hold about you.
- **Right to erasure.** You have the right to request erasure of your personal data. This enables you to ask us to delete or remove personal data in certain circumstances.

- **Right to restriction.** You have the right to request restriction of processing of your personal data.
- **Right to data portability.** In some cases, you have the right to request to transfer your personal data to you or to a third party of your choice.

How to exercise your rights. The exercise of the rights is free of charge and can be carried out by contacting us by email via the contact details below.

Merchants can review and edit their personal data by logging into their account and reviewing their personal data under the Settings tab on their Merchant dashboard. If you wish to change information relating to your industry or company website, or if you wish to close your account, you can submit a request at legal@rocketfuelblockchain.com. If you choose to close your Rocketfuel account, we will mark your account in our database as "closed". We will retain the information in the account in accordance with the record retention principles outlined in this Privacy Notice and as required by applicable law.

#### Contact Information

You may contact us with questions or concerns about our privacy policies or practices at <a href="mailto:legal@rocketfuel.inc">legal@rocketfuel.inc</a>