

Privacy Policy

Last Updated: July 7, 2023

This Privacy Policy of Gadze Finance SEZC (“us,” “we,” and “our”) describes the information we collect about you when you access our website at ether.fi and ether.fan (“the “Site”), enter into agreements with us, use our services and products, send us communications, or otherwise engage with us, and what we do with such information. Any references to ether.fi and ether.fan in this Privacy Policy also refer to its wholly owned subsidiaries. This Privacy Policy covers all of our services and products and all methods by which you may access our Site.

Controller Details

Gadze Finance SEZC,
Strathvale House, 4th Floor, 90
North Church Street George Town,
Grand Cayman, Cayman Islands, KY1 9012

Contact email address: contact@ether.fi

Scope of This Policy

This Privacy Policy is applicable to all Personal Information collected by our Site (“Personal Information”). For the purposes of this Privacy Policy, Personal Information is information that can reasonably identify, relate to, describe, be associated with, or reasonably be associated with a particular individual or household. Personal Information also includes information that may be classified as “Personal Data” or “Personally Identifiable Information” in some jurisdictions. This Privacy Policy does not apply to anonymized or de-identified data that cannot be used to identify you.

Personal Information We Collect

We may collect, store, use, and transfer the following types of Personal Information:

Identity Data such as cookie ID email address,

Transaction Data such as cryptocurrency wallet address(es), information relating to your ether.fi or ether.fan account and cryptocurrency trading transactions and related information for deposits or withdrawals.

Device Data such as internet protocol (IP) address, device type and model, device keys, device location, web browser type and version, operating system (OS) type and version, device creation/modification/authentication dates, device IDs, device login history.

Purposes and Legal Basis of Collection and Processing of Personal Information

Purpose of Processing	Persona Data	Legal Basis
Providing service for you in accordance with our Terms of Use and other agreements.	email address, internet protocol (IP) address, device type and model, device keys, device location, web browser type, cryptocurrency wallet address(es),	your consent necessary for the performance of our contractual obligations
Verify user information, prevent fraud	, internet protocol (IP) address, device type and model, device keys, device location, web browser type, cryptocurrency wallet address(es)	necessary for the performance of our contractual obligations vital interest
Personalize our service, associate staking to you.	internet protocol (IP) address, device type and model, device keys, device location, web browser type and version, operating system (OS) type and version, device creation/modification/authentication dates, device IDs	your consent necessary for the performance of our contractual obligations
Communicating with you in connection with the use of our service and providing customer support.	email address	your consent necessary for the performance of our contractual obligations
To improve our service, enhance customer experience, resolve bugs, errors and other issues that may arise during the operation.	internet protocol (IP) address, device type and model, device keys, device location, web browser type and version, operating system (OS) type and version	your consent necessary for the performance of our contractual obligations
For website analytics, data aggregations from the information to improve our service.	cookies	your consent for marketing cookies necessary for the performance of our contractual obligations
Determine general geo-location information (country and region) to safeguard our service and	address, internet protocol (IP) address	protect the vital interests of the data subject or of another natural person

comply with relevant laws and regulations.		compliance with a legal obligation
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How We Collect Information

Direct Interactions. You provide Personal Information when you use our services and products, open an account with us, request marketing information, participate in a promotion, engage with our social channels and/or contact us with questions or requests.

Technological Interactions. When you use our services and products, use our applications, or visit our website, we may collect device data and online data through cookies and other similar technologies (see Cookies and Automatically Collected Data). We may also collect cryptocurrency wallet addresses.

How We Use Your Personal Information

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present our Site, and its contents to you.
- To provide you with information that you request from us.
- To fulfill any other purpose for which you provide it.
- To notify you about changes to our Site.
- To allow you to participate in interactive features on our Site.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.
- Research and development purposes. We may use Personal Information for testing, research, analysis, product development, and machine learning to improve the user experience. This helps us to make our services more convenient and easier-to-use, enhance the safety and security of our services, and develop new services and features.
- Marketing. We may use Personal Information to market our services to our users. This includes sending users communications about ether.fi or ether.fan services, features, promotions, studies, surveys, news, updates, and events. We may do so through various methods, including , push notifications, in app communications and ads, and ads on third party platforms.
- Legal proceedings and requirements. We may use Personal Information to investigate or address claims or disputes relating to use of our services, to satisfy requirements under applicable laws, regulations, or operating licenses or agreements, or pursuant to legal process or governmental request, including from law enforcement.

- Non-marketing communications. We may use Personal Information to inform you of changes to our terms, services, or policies; or send other communications that aren't for the purpose of marketing the services or products of the Site or its partners.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

We will not use your Personal Information for purposes other than those purposes we have disclosed to you without your permission. If we need to use your Personal Information for an unrelated, new, or additional purpose, we will notify you and obtain your consent to use it for such unrelated, new, or additional purpose.

Sharing Your Personal Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Information that we collect, or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Site assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your Personal Information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Site, our customers, or others.

Opting Out of Sharing Your Personal Information

In addition to the circumstances described above, from time to time, we may request your permission to allow us to share your Personal Information with third parties. You may opt out of having your Personal Information shared with third parties, under certain circumstances, or from allowing us to use your Personal Information for a purpose that is incompatible with the purposes for which we originally collected it, or subsequently obtained your authorization. If you choose to so limit the use of your Personal Information, certain features or our services may not be available to you.

Permanent Information

Blockchain records are permanent, uneditable and immutable digital records. Interactions with the smart contract logs and events will create permanent records, which cannot be deleted.

Third-Party Websites

We may have links to unaffiliated third-party websites on our Site. These third-party websites have their own privacy policies. We have no involvement with their policies and are not responsible for their practices. You are encouraged to review the privacy policies of all third-party websites you visit.

Sale of Your Personal Information

We do not sell your Personal Information.

Personal Information of Minors

Our services and products are not intended for individuals under the age of eighteen (18). We do not knowingly collect and use Personal Information related to minors.

Cookies and Automatically Collected Data

Cookies are small text files sent from a site to a user's device to store bits of information related to that user or device. First-party cookies are put on your device directly by our website, which allows us to collect analytical data and provide other useful functions that create a good user experience. Third-party cookies are placed on your device by a third party (e.g.: advertiser or analytic system). The third parties who serve cookies on our site may link your Personal Information to other information they collect.

Certain features of our Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Site. Flash cookies are not managed by the same browser settings as are used for browser cookies.

Pages of our Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We use the following types of cookies:

- Strictly Necessary Cookies allow us to provide basic website functions such as browsing capabilities and secure access.
- Functional Cookies allow us to provide enhanced functionality. For example, we use these cookies to notify you of account updates, notifications, and reminders. You may refuse to accept these cookies; however, this may affect access to certain parts of our website. Additionally, you may not be able to take advantage of personalized features.
- Performance / Analytics Cookies collect information about how you use our Site, for example, which pages you visited, and which links you clicked. The information collected is aggregated and cannot be used to identify you.
- Marketing Cookies may be set on our Site by our advertising and marketing service providers and partners. They are used to track online activities and help us provide relevant advertising, links, or other information about our services and products to users visiting other websites after visiting our Site.
- Wallet Cookies are generated by the Site or the payment gateways when users perform blockchain-based transactions online. These cookies may store information on certain user characteristics and transaction information. Cookies may also collect wallet addresses.

We may also use automatic data collection technologies to authenticate users remembering user preferences and settings; to determine the popularity of content and measure the effectiveness of advertising campaigns; analyze site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services.

Managing Cookies and Other Similar Technologies

You can activate or later deactivate the use of cookies through a functionality built into your web browser. If you want to learn more about cookies, or how to control, disable or delete them, please visit <https://www.allaboutcookies.org/> for detailed guidance.

You can opt out of certain web-based targeted advertising by visiting the Digital Advertising Alliance (DAA) for participating companies at <https://optout.aboutads.info/?c=2&lang=EN> , or the Network Advertising Initiative (NAI) for participating companies at <https://optout.networkadvertising.org/?c=1>.

Individuals residing in Canada can visit <https://youradchoices.ca/en/tools> to learn about the DAA's opt out choices. Individuals residing in Europe can learn about opt out choices for web-based targeting advertising by visiting <https://www.youronlinechoices.eu/>.

Security

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your Personal Information transmitted to our Site.

Storing Personal Information

We will store your Personal Information until:

- They are necessary to render you Services.
- Your consent is withdrawn, expires or otherwise becomes invalid.
- You exercise your right to erasure.
- We have received a court order or a lawful authority's request mandating us to permanently delete all the Personal Information we have obtained about you.
- It is required by applicable laws.

Your Rights with Regard to Personal Data Processing

In connection with the accessing, browsing of the Site and using the services, you shall be entitled to exercise certain rights laid down by the GDPR, similar privacy laws and outlined herein below, however exercise of some of those rights may not be possible in relation to the Site and services taking account of the services' nature, manner, form and other applicable circumstances. In some cases, we may ask you to provide us additional evidence and information confirming your identity.

- **Right to Access:** you may request access to all Personal Information being processed about you by sending an email request to contact@ether.fi.
- **Right to Rectification:** if your Personal Information is inaccurate, you have the right to have the data rectified without undue delay. If you wish to rectify your personal information please send us an email request to contact@ether.fi
- **Right to Erasure (Right to be Forgotten):** you can send us the request to delete your Personal Information we are currently processing about you.
- **Restriction of Processing:** you are entitled to request restriction of processing of your Personal Information.
- **Objection to Processing:** under certain circumstances you may exercise this right with respect to your Personal Information. For example, you have absolute right to object to processing of your Personal Information if it is for direct marketing purposes.

- **Right to Data Portability:** you may exercise this right with respect to your Personal Information which allows you to obtain and reuse your Personal Information for your own purposes across different services.
- **Consent Withdrawal Right:** you are entitled to withdraw consent to the processing of your Personal Information. In particular, you can change your cookie choices by using our cookie consent tool built in the website. You can exercise your right to withdraw consent by unsubscribing from our email newsletter.
- **Automated Decision-Making, Profiling:** you have the right to object to decisions based solely on automated processing, including profiling.
- You shall have the right to file a complaint with a competent data protection supervisory authority.

Please keep in mind that the use of services based on public blockchains intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of personal data, in particular when blockchain data is combined with other data. Because blockchains are decentralized or third-party networks which are not controlled or operated by us, we are not able to erase, modify, or alter personal data from such networks.

International Data Transfer

We may transfer information collected about you, including Personal Information, to affiliated entities, or to other third-party service providers across borders and from your country or jurisdiction to other countries or jurisdictions around the world (all solely for legitimate business purposes). Please note that we may transfer such information to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to such transfer of information. Such jurisdictions are the US and the EU/EEA.

Transfers of Personal Information to third countries, shall be made subject to appropriate safeguards approved by government authorities such as standard contractual clauses adopted by a supervisory authority and approved by the European Commission.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on the Site home page. If we make material changes to how we treat our users' Personal Information, we will notify you by email to the primary email address specified in your account and through a notice on the Site. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Site and this Privacy Policy to check for any changes.