

# Scorum Platform Privacy Policy

Effective: June 06, 2018

This Privacy Policy describes how Scorum collects, uses and discloses information, and what choices you have with respect to the information. This Policy applies to the scorum.com, Scorum subdomains (e.g., wallet.scorum.com) and services (collectively, "Services").

We respect the privacy of all users of the Website and ensure that Personal Data of the consumers is treated confidentially and in compliance with applicable laws and regulations.

When we refer to "Scorum", we mean the Scorum entity that acts as the controller of your information.

You should only use the Scorum if you are familiar with blockchain technology. Scorum highly recommends learning the basics of the blockchain technology before running the Scorum.

Due to the fact, that Scorum is powered with Blockchain technology we recommend you not to use your personal information when creating your Username in Scorum.

By using the Services, you accept the terms of this Policy and our Terms of Service, and consent to our initial collection, use, disclosure, and retention of your information as described in this Policy and Terms of Service.

Please note that this Policy does not apply to information collected through third-party websites or services that you may access through the Services or that you submit to us through email, text message or other electronic message or offline.

If you are visiting this site from the European Union (EU), see our Notice to EU Data Subjects below for our legal bases for processing and transfer of your data.

## 1. What we collect

We get information about you in a range of ways.

Information You Give Us. Information we collect from you includes:

- IP address;
- Language information;
- Contact information, such as your email address;

Information Automatically Collected. We may automatically record certain information about how you use our Site (we refer to this information as "Log

Data“). Log Data may include information such as a user’s Internet Protocol (IP) address, device and browser type, and operating system. We use this information to administer and provide access to the Services.

Information we will never collect. We will never ask you to share your private keys or wallet seed. Never trust anyone or any site that asks you to enter your private keys or wallet seed.

## 2. Use of personal information

To provide our service we will use your personal information in the following ways:

- To enable you to access and use the Services
- To comply with law
- We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.
- For compliance, fraud prevention, and safety

We may use your personal information to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

## 3. Sharing of personal information

We do not share or sell the personal information that you provide us with other organizations without your express consent, except as described in this Privacy Policy. We disclose personal information to third parties under the following circumstances:

**Affiliates.** We may disclose your personal information to our subsidiaries and corporate affiliates for purposes consistent with this Privacy Policy.

**Business Transfers.** We may share personal information when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.

**Compliance with Laws and Law Enforcement; Protection and Safety.** We may share personal information for legal, protection, and safety purposes.

We may share information to comply with laws.

We may share information to respond to lawful requests and legal processes.

**Professional Advisors and Service Providers.** We may share information with those who need it to do work for us. These recipients may include third party companies and individuals to administer and provide the Service on our

behalf (such as customer support, hosting, email delivery and database management services), as well as lawyers, bankers, auditors, and insurers.

Other. You may permit us to share your personal information with other companies or entities of your choosing. Those uses will be subject to the privacy policies of the recipient entity or entities.

We may also share aggregated and/or anonymized data with others for their own uses.

#### 4. How information is secured

We retain information we collect as long as it is necessary and relevant to fulfill the purposes outlined in this privacy policy. In addition, we retain personal information to comply with applicable law where required, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Terms of Service, and other actions permitted by law. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

We employ industry standard security measures designed to protect the security of all information submitted through the Services. However, the security of information transmitted through the internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data. Users of the Services are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our digital services.

#### 5. Accessing, Updating, Correcting, and Deleting your Information

You may access information that you have voluntarily provided through your account on the Services, and to review, correct, or delete it by sending a request to [privacy@scorum.com](mailto:privacy@scorum.com). You can request to change contact choices, opt-out of our sharing with others, and update your personal information and preferences.

## 6. Contact information

We welcome your comments or questions about this Policy, and you may contact us at: [privacy@scorum.com](mailto:privacy@scorum.com).

## 7. Changes to this Privacy Policy

We may change this privacy policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make any changes, we will change the Last Updated date above.

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the changes to the Site (or as otherwise indicated at the time of posting). In all cases, your continued use of the Site or Services after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

## 8. Eligibility

If you are under the age of majority in your jurisdiction of residence, you may use the Services only with the consent of or under the supervision of your parent or legal guardian. If we learn that we have received any information directly from a child under age 13 without first receiving his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the Site and subsequently we will delete that information.

## NOTICE TO EU DATA SUBJECTS

### 1. Personal Information

Personal Data is data that can be used to identify you directly or indirectly, or to contact you ("Personal Data"). The Privacy Policy covers all Personal Data that you voluntarily submit to us and that we obtain from third parties. This Privacy Policy does not apply to anonymized data, as it cannot be used to identify you.

We collect your Personal Data for the primary purposes of rendering you the Services. We may also use your Personal Data for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

With respect to EU data subjects, "personal information," as used in this Privacy Policy, is equivalent to "personal data" as defined in the European Union General Data Protection Regulation (GDPR).

### 2. Legal Bases for Processing

We only use your personal information as permitted by law. We are required to inform you of the legal bases of our processing of your personal information, which are described in the table below. If you have questions about the legal bases under which we process your personal information, contact us at [legal@scorum.com](mailto:legal@scorum.com).

### 3. Processing Purpose

- Legal Basis
- For compliance, fraud prevention, and safety
- To provide our service

These processing activities constitute our legitimate interests. We make sure we consider and balance any potential impacts on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by any adverse impact on you (unless we have your consent or are otherwise required or permitted to by law).

### 4. With your consent

Where our use of your personal information is based upon your consent, you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us at [privacy@scorum.com](mailto:privacy@scorum.com)

### 5. Use for New Purposes

We may use your personal information for reasons not described in this Privacy Policy, where we are permitted by law to do so and where the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis for that use. If we have relied upon your consent for a particular use of your personal information, we will seek your consent for any unrelated purpose.

### 6. What are Your Rights

You have rights to transparent information, communication and modalities for the exercise of your rights as the Data Subject under GDPR. Your principal rights under GDPR are:

- the right to be informed;
- the right to access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to object to processing;

- the right to data portability;
- the right to complain to a supervisory authority;
- the right to withdraw consent.

You have the right to be informed about the collection and use of Personal Data. Information must be concise, transparent, intelligible, easily accessible, and written in clear and plain language.

You have the right to request details of Personal Data which we hold about you under GDPR, this includes access to Personal Data, together with certain additional information. Additional information includes details of the purposes of the processing, the categories of Personal Data. The rights and freedoms of others are not affected.

You have “the right to be forgotten”, to the erasure of your Personal Data without undue delay. It applies in following circumstances:

- Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw consent to consent-based processing;
- you object to the processing under certain rules of applicable data protection law;
- the processing is for direct marketing purposes;
- Personal Data have been unlawfully processed.

However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.

In some circumstances, you have the right to restrict the processing of your Personal Data. Those circumstances include: you contest the accuracy of Personal Data; processing is unlawful but you oppose erasure; Personal Data is no longer needed for the purposes of processing, but you require Personal Data for the establishment, exercise or defense of legal claims; you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your Personal Data.

You have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics.

To the extent that the legal basis for our processing of your Personal Data is consent; or that the processing is necessary for the performance of an agreement to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your Personal Data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

To the extent that the legal basis for our processing of your Personal Data is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your Personal Data by an email notice to us at [privacy@scorum.com](mailto:privacy@scorum.com).

## 7. Storage of your Personal Data

We will try to limit the storage of your Personal Data to the extent that storage is necessary to serve the purposes for which the Personal Data was processed, to resolve disputes, enforce our agreements, and as required or permitted by law.

## 8. Why do we use Cookies?

We generally use Cookies for the following purposes:

- To allow registered users to stay logged in to the site after they close their browser window;
- To store users' preferences for site functionality; and
- To track site usage so we can improve our site & better understand how people are using it
- To better understand the interests of our customers and our website visitors.

Some Cookies are necessary for certain uses of the Site, and without such Cookies, we would not be able to provide many services that you need to properly use the Site. These Cookies, for example, allow us to operate our Site so you may access it as you have requested and let us recognize that you have created an account and have logged into that account to access Site content. They also include Cookies that enable us to remember your previous actions within the same browsing session and secure our Sites.

We also use functional Cookies and Cookies from third parties for analysis and marketing purposes. Functional Cookies enable certain parts of the site to work properly and your user preferences to remain known. Analysis Cookies, among other things, collect information on how visitors use our Site, the content and products that users view most frequently, and the

effectiveness of our third party advertising. Advertising Cookies assist in delivering ads to relevant audiences and having our ads appear at the top of search results. Cookies are either “session” Cookies which are deleted when you end your browser session, or “persistent,” which remain until their deletion by you (discussed below) or the party who served the cookie. Full details on all of the Cookies used on the Site are available at our Cookie Disclosure table below.

## 9. How to disable Cookies

You can generally activate or later deactivate the use of cookies through a functionality built into your web browser. To learn more about how to control cookie settings through your browser:

Click [here](#) to learn more about the “Private Browsing” setting and managing cookie settings in Firefox;

Click [here](#) to learn more about “Incognito” and managing cookie settings in Chrome;

Click [here](#) to learn more about “InPrivate” and managing cookie settings in Internet Explorer; or

Click [here](#) to learn more about “Private Browsing” and managing cookie settings in Safari.

If you want to learn more about cookies, or how to control, disable or delete them, please visit <http://www.aboutcookies.org> for detailed guidance. In addition, certain third party advertising networks, including Google, permit users to opt out of or customize preferences associated with your internet browsing.

We may link the information collected by Cookies with other information we collect from you pursuant to this Privacy Policy and use the combined information as set forth herein. Similarly, the third parties who serve cookies on our Site may link your name or email address to other information they collect, which may include past purchases made offline or online, or your online usage information. If you are located in the European Economic Area, you have certain rights that are described above under the header “Notice to EU Data Subjects”, including the right to inspect and correct or delete the data that we have about you.



Name of Cookie/ Identifier	What does the cookie generally do (e.g., website function and administration, analytics, marketing)?	Is it a 1st or 3rd party cookie and what is the name of the party providing it?	What type of cookie is it (persistent or session)?	What is the duration of the cookie on the website (if not cleared by the user)?
_ga	Google Analytics	Third-party; Google	Persistent	2 years
_ym	Yandex Metrica	Third-party; Yandex	Persistent	1 year