



# PRIVACY POLICY

This policy is related to the privacy and treatment of personal data.

The FlowCom team and the company are committed to the responsible custody of the information you provide us and the information we collect in the development of our business operations. We establish the necessary mechanisms to comply with EU regulations for personal data and respect for personal privacy.

This privacy policy describes how FlowCom may collect, use and share information, related to the operation of our website <https://flowcom.io/> or related services, such as the wallet system, called "online services" in this privacy policy document.

## 1. TYPES OF INFORMATION WE COLLECT:

We collect your personal information when you provide it to us. "Personal information" is any information that may be used to identify you or that we may link with you as an individual. This is also known as personal data as defined in the EU General Data Protection Regulation (GDPR).

We also collect non-personal information. We may automatically collect certain information when you use, access or interact with our online services.

We shall also collect information from other sources, such as social media platforms that can share information about how we interact with our content on social media.

## 2. INFORMATION WHICH PROVIDES US

Generally, you can use our online services without providing us with any personal information. However, some information is required to access all the service's features. We collect information that you provide to us voluntarily, even when you communicate with us by email or other channels; when you sign up an account with us and when you respond to our communications or requests for information. The information you provide may include your name, contact information, position, address and other personal information.

Some of our online services may ask you to enter a password or other information to access certain features, and we collect those credentials when you generate them.

## 3. INFORMATION THAT WE CAN AUTOMATICALLY COLLECT THROUGH COOKIES AND SIMILAR TECHNOLOGIES

We use browser cookies and similar technologies (collectively, "cookies") to collect and store certain information when you use, access or interact with our online services. For example, we can collect material about the type of device you use to access the online services, the operating system version, your IP address, your generic geographic location as indicated by your IP

address, your type of web browser and the functions to which you access online services, either cause you interact with the content available in the online services or through the searches you perform on the site.

#### 4. INFORMATION WE CAN COLLECT FROM THIRD PARTY SOURCES

We may receive information about you from other sources, including third parties that give us a hand to update, expand and analyze our records; or prevent or detect fraud. Please note that the information we may receive is governed by the configuration of the privacy policy and/or the procedures of the transferor.

#### 5. HOW WE USE THE INFORMATION WE COLLECT

We can use the information we collect:

- To answer your queries;
- To provide our products and services and everything you request;
- To operate and improve online services;
- To send you marketing communications and other information or material that may be of interest to you or that you have expressed interest in receiving;
- To keep our contact list;
- To understand how people, use our online services, including through the generation and analysis of statistics;
- For commercial purposes of the company, including data analysis, billing, detecting, preventing and responding to real or potential fraud, illegal activities or infringements of intellectual property;
- Evaluate the effectiveness of our events, promotional campaigns and publications.
- As we believe rationally important or appropriate to: comply with our legal obligations; respond to legal processes or requests for information issued by government authorities or other third parties; or to protect your rights, ours or those of third parties.

We can add personal data and other data captured through our online services so that the data is no longer able to identify a person. The aggregated data may cover usage patterns related to our online services and the company reserves the right to use this aggregate information in order to improve our online services, sell aggregate data to third parties, generate and market information and other related aspects with the purpose of our business.

#### 6. PRECISE LOCATION INFORMATION

When you access online services through a mutable device, we may collect information about your precise location if you allow online services to access that information. We use this material to give you personalized content based on your location.

## 7. REASONS FOR USING YOUR PERSONAL INFORMATION

We rely on the following legal reasons to process your personal information, namely:

- Execution of a contract: we may need to collect and use your personal information to enter into a contract with you or to enter into a contract with us. For example, when you use our online services, we will use your personal information to respond to your requests and provide you with those services.
- Consent. To withdraw your consent for such use, you can contact us through our contact page, or you can deactivate the sharing of location information in your browser or in the configuration of your mobile application. When required by applicable laws, we will rely on your consent for direct marketing and to gather information from your device or computer.
- Legitimate interests: we can use your personal information for our legitimate interests to improve our products and services and the content of our online services. In accordance with our legitimate interests and any options that we offer or consent that may be required by applicable laws, we may use the technical information as described in this privacy policy and personal information for our marketing purposes.

## 8. HOW WE CAN SHARE THE INFORMATION WE COLLECT

We may share the individual's information we collect with other entities within the company's network.

We do not sell, rent or share information that identifies you or your organization with unaffiliated entities for your independent use, except as expressly described in this privacy policy or with your prior permission. We may share information that does not reasonably identify you or your organization as permitted by applicable law.

We may also be required to communicate the information we collect:

- To third-party service providers that provide services on our behalf, such as web hosting companies, analysis providers and information technology providers.
- For the application of the law, to other governmental authorities or third parties (within or outside the jurisdiction in which you reside) as permitted or required by the laws of any jurisdiction that apply to us; as provided in the contract; or when we consider it reasonably necessary to provide legal services. In these circumstances, we make reasonable efforts to notify you of the use before disclosing information that can reasonably identify you or your organization, unless prior notice is prohibited by applicable law or is not possible or reasonable in those circumstances.

- To service providers, advisors, potential transaction partners or other third parties in relation to the consideration, negotiation or termination of a transaction in which we are acquired or merged by another company or sell, liquidate or transfer all or a portion of our assets.

The employees of the company may have access to any information we collect through our online services, but their use will be limited to the performance of their duties and in accordance with the reason for the processing. Our employees are required to maintain the confidentiality of information and are not authorized to use it for any other purpose than to allow you to use the services online or to respond to requests you send us.

## 9. PROTECTION AND STORAGE OF THE INFORMATION WE COLLECT

We implement administrative, technical and physical security measures designed to comply with applicable legal requirements and safeguard the information we collect. This includes, when necessary or appropriate and feasible, obtaining written guarantees from third parties that can access your data that will protect the data with guarantees designed to provide a level of protection equivalent to that adopted by FlowCom.

However, no information system can be 100% secure. Therefore, we cannot guarantee the absolute security of your information. In addition, we are not responsible for the security of the information you transmit to us through networks that we do not control, including Internet and wireless networks.

We store the information we collect in Europe, including the countries where we or our service providers have facilities. Keep in mind that your data will most likely be stored in countries outside of your country of residence and may have data protection laws and regulations that differ from those in your country. We operate from Europe, we comply with the obligations of the European Regulation of Protection of personal data and digital rights.

We retain the information we collect for a period no longer than reasonably necessary to fulfill the purposes for which we collect the information and to comply with our legal obligations.

## 10. SERVICES AND THIRD-PARTY CONTENT

Our online services may include integrated content or links to content provided by third parties (such as video materials). This privacy policy does not address the privacy, security or other practices of third parties that provide such content.

We involve third parties that support the operation of our online services, such as analysis providers. These third parties can use technologies to track their online activities over time and on different websites and online platforms.

## 11. YOUR OPTIONS AND RIGHTS

Subject to your local law and / or EU law, you may have certain rights with respect to the information we have collected that is related to you. We recommend that you contact us to update or correct your information if it changes or if you believe that any information we have collected about you is inaccurate or outdated. You can also ask us to see what personal information we have about you to delete your personal information and you can tell us if you object to us using your personal information. In some jurisdictions, you may have the right to file a complaint with your local data protection authority. If you wish to discuss or exercise any rights you may have, send us an email to [support@flowcom.io](mailto:support@flowcom.io).

If you no longer wish to receive our marketing communications, you can inform us by sending us an email to [support@flowcom.io](mailto:support@flowcom.io). The electronic marketing communications that we send you also contain exclusion mechanisms that allow you to stop receiving such communications at any time. We will appreciate your choice and will abstain from sending you such announcements. You can also choose to re-receive those communications at any time.

## 12. CHILDREN UNDER THE AGE OF EIGHTEEN YEARS

The FiG token and FlowCom activities are not directed to children under the age of eighteen, and the company will never knowingly collect personal information from children under the age of eighteen. If you are under the age of eighteen, you must request permission from your parents or guardians to use our online services and provide us with written evidence of such consent.

## 13. CHANGES IN THIS PRIVACY POLICY

We may update this privacy policy from time to time and we recommend that you periodically review this page. If we make substantial changes to the way we collect, use and/or share the personal information you have provided to us, we will notify you by posting the notice of the changes clearly and conspicuously on the website.

## 14. CONTACT US

We always welcome your queries and comments.

As long as you want to contact us, send us an email to [support@flowcom.io](mailto:support@flowcom.io).