



SUPRATOKEN

PRIVACY POLICY

Effective Feb 13, 2018

SupraToken, (“SupraToken”, “our”, “us” or “we”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive from (i) users of our website located at www.SupraToken.com (this “Site”) and users of our online platform, which we make available via the Site and at app.SupraToken.com (together with the Site, the “Service”). This Privacy Policy applies only to information that you provide to us through the Service. This Privacy Policy may be updated from time to time. We will notify you of any material changes by posting the new Privacy Policy via the Service. You are advised to consult this policy regularly for any changes. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our SupraToken Terms of Use, accessible at <http://www.SupraToken.com/terms-of-use/>.

As used in this policy, the terms “using” and “processing” information include using cookies on a computer, subjecting the information to statistical or other analysis and using or handling information in any way, including, but not limited to, collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organization or among our affiliates within the United States or internationally.

Information Collection and Use

Our primary goals in collecting information are to provide and improve the Service, features and content, to administer your use of the Service and to enable users to enjoy and easily navigate the Site.

Personally Identifiable Information.

- When you register with us through the Site to use the Service or when you choose to contact us via the Site, we will ask you for personally identifiable information. This refers to information about you that can be used to contact or identify you (“Personal Information”). Personal Information includes, but is not limited to, your name, company name, phone number, email address and postal address. If you choose to purchase a subscription to use the Service, we may also collect financial information such as your credit card number and billing address to facilitate your purchase.

- As a customer who has registered to use the Service, you have the option of granting SupraToken access to accounts you may have with certain third party service providers (each such account, a “Third Party Account”) to enable SupraToken to capture and make available via your account on the Service the personally identifiable information about you and other content that you have stored in your account with such Third Party Account (“Third Party Account Content”). By granting SupraToken access to any Third-Party Accounts you understand that SupraToken will access, make available and store (if applicable) your Third-Party Account Content so that it is viewable on or through the Service. SupraToken is not responsible for any Third-Party Account Content you have stored on any Third-Party Accounts that you choose to make available via the Service. Depending on the Third-Party Accounts you choose and, subject to the privacy settings you have set in your Third-Party Accounts, personally identifiable information that you post to your Third-Party Accounts may be viewable via the Service. Please note that if a Third-Party Account becomes unavailable or closes, SupraToken’s access to your Third-Party Account, any Third-Party Account Content from that Third-Party Account will no longer be viewable via the Service. You have the ability to disable the connection between the Service and your Third-Party Accounts at any time via the “Campaigns” section of the Service.

- We also collect other information that you provide as part of registration and the administration and personalization of your use of the Service (e.g., without limitation, zip code (on its own), information related to your interactions and activities on the Service (e.g., messages you choose to act upon via the Service) and individual preferences) (“Non-Identifying Information”).

- We use your Personal Information (in some cases, in conjunction with your Non-Identifying Information) mainly to provide the Service, complete your transactions, as applicable, and administer your inquiries.

- Certain Non-Identifying Information would be considered a part of your Personal Information if it were combined with other identifiers (for example, combining your zip code with your street address) in a way that enables you to be identified. But the same pieces of information are considered Non-Identifying Information when they are taken alone or combined only with other non-identifying information (for example, your viewing preferences). We may combine your Personal Information with Non-Identifying Information and aggregate it with information collected from other SupraToken Users (defined below) to attempt to provide you with a better experience, to improve the quality and value

of the Service and to analyze and understand how the Site and Service are used. We may also use the combined information without aggregating it to serve you specifically, for instance to deliver a product to you according to your preferences or restrictions.

•We also use your Personal Information to contact you with SupraToken newsletters, marketing or promotional materials and other information that may be of interest to you. If you decide at any time that you no longer wish to receive such communications from us, please follow the unsubscribe instructions provided in any of the communications. (See “Changing or Deleting Information,” below.)

Log Data. When you access the Service, whether as a SupraToken customer or a non-registered user just browsing (any of these, a “SupraToken User”), our servers automatically record information that your browser sends whenever you visit a website (“Log Data”). This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type or the webpage you were visiting before you came to the Service, pages of the Service that you visit, the time spent on those pages, information you search for on the Service, access times and dates, and other statistics. We use third-party services, including Google Analytics, to collect, monitor and analyze this information to increase the Site’s functionality and user-friendliness, and to better tailor it to our visitors’ needs. Accordingly, Log Data is shared with Google, which has its own privacy policy addressing how it uses such information. We use this information to monitor and analyze use of the Site and the Service and for the Site’s technical administration. and to better tailor the Service to our visitors’ needs. We also use this information to verify that visitors to the Site meet the criteria required to process their requests.

Cookies

Like many websites, we use “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s hard disk for record-keeping purposes. We use cookies for two purposes. First, we utilize persistent cookies to save your login information for future logins to the Service. Second, we utilize session ID cookies to enable certain features of the Service, to better understand how you interact with the Service and to monitor aggregate usage by SupraToken Users and web traffic routing on the Service. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Service and then close your browser. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all portions of the Site or all functionality of the Service.

Phishing

Identity theft and the practice currently known as “phishing” are of great concern to SupraToken. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your credit card information, your login information, or national identification numbers in a non-secure or unsolicited e-mail or telephone communication. For more information about phishing, visit the Federal Trade Commission’s website.

Information Sharing and Disclosure

Third Party Social Networking Services. The Service gives you the option to share information contained in your account with certain third party social networking services (e.g., Twitter and Facebook). We will not share your account information, which may contain your Personal Information, with such third party social networking services unless you expressly authorize such disclosure.

Aggregate Information and Non-Identifying Information. We may share aggregated information that does not include Personal Information and we may otherwise disclose Non-Identifying Information and Log Data with third parties for industry analysis, demographic profiling and other purposes. Any aggregated information shared in these contexts will not contain your Personal Information.

Service Providers. We may employ third party companies and individuals to facilitate the Service, to provide the Service on our behalf, to perform Service-related services (e.g., without limitation, maintenance services, database management, payment processing, web analytics and improvement of the Site’s features) or to assist us in analyzing how the Site and Service are used. These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Compliance with Laws and Law Enforcement. SupraToken cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of SupraToken or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable activity.

Business Transfers. SupraToken may sell, transfer or otherwise share some or all its assets, including your Personal Information, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

Changing or Deleting Your Information

All customers who have registered to use the Service may review, update, correct or delete the Personal Information in their registration profile by contacting us. If you completely delete all such information, then your account may become deactivated. If you would like us to delete your account in our system, please contact us at support@SupraToken.com with a request that we delete your Personal Information from our database. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes.

Security

We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored “personal data” (as defined in applicable state statutes on security breach notification) to you via email or conspicuous posting on the Service in the most expedient time possible and without unreasonable delay, insofar as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

International Transfer

Your information may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide information to us, SupraToken transfers Personal Information to the United States and processes it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Links to Other Sites

The Service contains links to other websites. If you choose click on a third-party link, you will be directed to that third party’s website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other sites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

Our Policy Toward Children

The Service is not directed to persons under 18. We do not knowingly collect personally identifiable information from children under 13. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at info@SupraToken.com. If we become aware that a child under 13 has provided us with Personal Information, we will delete such information from our files.

Contacting Us

If you have any questions about this Privacy Policy, please contact us at info@SupraToken.com.