

Panchain Privacy Policy

Last updated: January 1, 2019

Panchain, Inc., its subsidiaries, and affiliates (“Us”, “We”, “Our”) is dedicated to protecting your personal information, and We strive to be clear about how We collect, use, disclose, transfer, and store it. “Personal Information” is information that can be used to identify or contract you individually, such as your name or email address. This privacy policy (the “Privacy Policy” or the “Policy”) explains our information practices. This Privacy Policy applies to any application, software, services, websites, and other related services provided by Us or any third party designated by Us (collectively, the “Services”).

Please be sure to read this entire Private Policy before using or submitting information through the Services. This Privacy Policy is incorporated into Our Terms of Service at <http://passfolioapp.com/terms.pdf>. Any capitalized term that is not defined in this Policy shall have the meaning given to it in the Terms of Service.

1. Information We Collect

A. Information You Provide Directly

Some Services enable you to give Us information directly. For example:

- Surveys We may ask you to complete may ask you to provide certain information about yourself. For example, in a survey We may ask you for your name and email address.
- If you sign up for an account to use our Services, We may ask for your name, contact information, a government issued ID, and other information required by Our Anti-Money Laundering procedures and Know Your Customer review.
- Some of the Services enable you to communicate with other people. Those communications will be transmitted through Our systems.

B. Information About Your Use of the Services

In addition to the information you provide, We may collect information about your use of the Services through software on your device and other means. For example, We may collect:

- *Device Information.* We automatically collect device-specific information, such as your hardware model, IMEI number and other unique device identifiers, MAC address, IP address, operating system versions, and settings of the device you use to access the Services (collectively, “Device Identifiers”). We may associate your Device Identifiers with your Account.

- *Log Information.* When you use the Services or view content provided by Us, We automatically collect and store information, such as the time and duration of your use of the Services, details of how you use the Services, and any information stored in cookies that We have set on your device.
- *Location Information.* When you use the Services, We may collect and process information about your actual location. We may use various technologies to determine location, including your device's IP address, your device's GPS signal, or information about nearby WiFi access points and cell towers that may be transmitted to Us when you use the Services.
- *Other Information.* We may also collect other information about you or your use of the Services, such as the applications you use, the websites you visit, and how you interact with content offered through the Services.
- *Session Trackers.* In operating the Services, We may use cookies and similar session tracking technologies ("Session Trackers"). Session Trackers help provide additional functionality to the Services, customize users' experiences with the Services, and help Us analyze usage of the Services more accurately for research and product development purposes. We (including third parties that We work with) may place Session Trackers on your device for security purposes, to facilitate navigation of the Services, and to personalize your experience while using the Services.

If you would prefer not to accept Session Trackers while using the Services, follow the instructions provided by your website or mobile browser (usually located within the "Help", "Tools", or "Edit" facility) to modify your Session Tracking settings. Please note that if you disable Session Trackers, you may not be able to access certain parts of Our Services and other parts of Our Services may not function properly.

- *Web Beacons.* In addition to Session Trackers, We may use web beacons (also known as "clear GIFs"), which are transparent graphic images placed on a web page or in an email and indicate that a page or email has been viewed or tell your browser to get content from another server. We use web beacons to measure traffic to or from, or use of, Our online forms, tools or content items and related browsing behavior and to improve your experience when using the Services. We may also use customized links or other similar technologies to track hyperlinks that you click and associate that information with your Personal Information in order to provide you with more focused communications.

C. Non-Personal Information

We may modify and combine Personal Information in a manner that does not personally identify you or any other individual and thus, no longer constitutes Personal Information. We may use this non-Personal Information, such as aggregate user statistics and usage information, for any lawful purpose.

D. Information from Third-Party Sources

We may receive information about you from publicly and commercially available sources (as permitted by law), which We may combine with other information We receive from you or about you. If We combine such information with Personal Information We collect through the Services, such information is subject to this Privacy Policy unless We have disclosed otherwise.

2. How We Use Your Information

We may use information We collect for a variety of reasons related to Our operation and your use of the Services. Examples of ways in which We may use your Personal Information include, but are not limited to, the following:

- to register you for a Service;
- to provide a Service you request;
- to provide customized content and provide personalized services based on your past activities on the Services;
- to send you promotional communications;
- to send you important notices about the Services, such as upcoming changes or improvements;
- to understand the way people use the Services so that We can improve them and develop new products and services;
- to respond to your inquiries or requests (e.g., if you contact Us to ask a question or report an issue with the Services, We may use the Personal Information you provide to answer your questions or resolve your problem);
- to improve the content, appearance, and utility of the Services; and
- otherwise with your consent.

3. Disclosure of Personal Information

We will not disclose your information to third parties for their own independent marketing or business purposes without your consent. However, We may disclose your information to the following entities:

- *Affiliates*. Your information may be shared among Our affiliates for the purposes described in this Policy. “Affiliates” refers to companies related to Panchain, Inc. by common ownership or control.

- *Business Partners.* We may also share your information with trusted business partners. These entities may use your information to provide services you request or provide you with promotional materials, advertisements, and other materials.
- *Service Providers.* We may also share your information to companies that provide services for or on behalf of Us, such as companies that process information or manage or enhance user data. These entities are limited in their ability to use your information for purposes other than providing services for Us.
- *Legal Disclosures.* There may be instances when We disclose your information to other parties: (i) to comply with the law or respond to compulsory legal processes or enforceable governmental requests; (ii) to verify or enforce compliance with the policies governing Our Services; (iii) to protect the rights, property, or safety of any of Our respective affiliates, business partners, or customers; and (iv) detect, prevent, or otherwise address fraud, security, or technical issues.
- *Corporate Transactions.* We may also disclose your information to a third party as part of a merger or transfer, or in the event of a bankruptcy.
- *With Your Consent.* In addition to the disclosures described in this Policy, We may share information about you with third parties when you consent to or request such sharing.

4. Updating Your Personal Information and Information Retention

If you wish to modify, verify, correct, delete, or update any of your Personal Information collected through the Services, you may contact Us at hello@panchaininc.com. We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

We aim to maintain Our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from Our Services, We may not immediately delete residual copies from Our active servers and may not remove information from Our backup systems.

5. Security of Your Personal Information

We have put in place reasonable administrative, technical and physical measures to safeguard the information We collect in connection with the Services. However, please note that although We take reasonable steps to protect your information, no website, Internet transmission, computer system, or wireless connection is completely secure. You use the Services and provide Us with Personal Information at your own risk.

6. Your California Privacy Rights

We will not disclose your personal information to third parties for the third parties' direct marketing purposes.

7. Third-Party Links and Products

This Privacy Policy covers only Our privacy practices. Our Services may link to third-party websites and services that are outside Our control. We are not responsible for the security or privacy of any information collected by websites or other services. You should exercise caution and review the privacy statements applicable to the third-party websites and services you use.

We may also make available to you certain products or services developed by third parties. We are not responsible for these third-party products or services.

8. Children Under 13

The Services are not directed to children under 13 years of age, and We do not knowingly collect Personal Information from children under the age of 13. If We become aware that a child under the age of 13 has provided Us with Personal Information, We will make reasonable efforts to delete such information in accordance with applicable law.

9. Do Not Track Signals and Similar Mechanisms

Some web browsers transmit “do-not-track” signals to the websites with which the user communicates, although web browsers incorporate and activate this functionality in different ways, and it is not always clear whether users intend for these signals to be transmitted. There currently is disagreement concerning what, if anything, websites should do when they receive such signals. We currently do not take action in response to these signals. However, when a standard is established and accepted, We may reassess how to respond to these signals.

10. Changes to this Policy

This Policy is the sole authorized statement of Our practices with respect to the collection of Personal Information and the subsequent use and disclosure of such information. We may revise this Policy from time to time without prior notice to you, and any changes will be effective immediately upon the posting of the revised Privacy Policy on Our website. You should periodically check the Policy to ensure that you are familiar with the most current version. You can determine when this Policy was last revised by checking the “Last Updated” legend at the top of the Policy.

11. Questions

Questions about the Privacy Policy should be sent to hello@panchaininc.com.