

Last Updated: 08/08/2018

# Privacy Policy

Privacy and online safety are important to Flame Technologies ("Company"). We offer a ERC 20 Ethereum token to be used as a reward for activities on Sharesome platform as well as an easy to use token for tips and other digital services. Some of our products and services are available for free without registering as a user on our site; other products and services require registering as a user on our system; other products and services may involve certain fees. Please also reference our Terms of Use (<https://flametoken.io/termsandconditions>) for more information on your rights as a Flame token user.

We collect data about businesses and their customers ("Data") when they use the platform, the services, and our websites (collectively, "Services"). This privacy policy describes how we collect, use and disclose Data.

In this privacy policy, we sometimes refer to "You". "You" may be a visitor to one of our websites, a user of one or more of our Services ("User"), or a customer of a User ("Customer"). We'll do our best to clarify who we are referring to at various points in the policy. This policy does not apply to third-party websites, products, or services even if they link to our Services, and You should consider the privacy practices of those third-parties carefully. If You disagree with the practices described in this policy, You should (a) take the necessary steps to remove cookies from Your computer after leaving our website, and (b) discontinue Your use of our Services.

## 1. Overview

The Data we collect depends on how our Services are used. Sometimes we receive Data directly, such as when an account is created, test transactions are submitted through our website, or we receive an email. Other times, we get Data by recording interactions with our Services – for example, using technologies like cookies and web beacons. We also get Data from third parties, like our financial partners or identity verification services.

The collection and use of data from a variety of sources is essential to our ability to provide our Services – and to help keep the Services safe. Data is critical in helping us to increase the safety of Your online payments, and reduce the risk of fraud, money laundering and other harmful activity.

## 2. Data We Collect

a. **Personal Data.** We call Data that identifies, or that could reasonably be used to identify, You as an individual "Personal Data". We collect Personal Data in different ways. For example, we collect Personal Data when a user registers on our airdrop website ("User"). We also receive Personal Data from other sources, such as our partners, financial service providers, identity verification services, and publicly available sources. Personal Data does not include Data that has been aggregated or made anonymous such that it can no longer be reasonably associated with a specific person.

The Personal Data that we may collect includes:

Contact details, such as name, postal address, telephone number, email address;

b. **Other Data.** We call Data other than Personal Data "Other Data". We collect Other Data through a variety of sources. One of our sources for Other Data is cookies and other technologies that record Data about the use of our websites, websites that implement our Services, and the use of our Services generally. Other Data that we may collect include:

Browser and device data, such as IP address, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons and the version of the Services You are using;

Transaction data, such as purchases, purchase amount, date of purchase, and payment method;

Cookie and tracking technology data, such as time spent on the Services, pages visited, language preferences, and other anonymous traffic data; and

## 3. How We Use Data

a. **Personal Data.** We and our service providers use Personal Data to: (i) provide the Services; (ii) detect and prevent fraud; (iii) mitigate financial loss or other harm to Users, Customers, and The Company; and (iv) promote, analyze and improve our products, systems, and tools. Examples of how we may use Personal Data include:

To verify an identity for compliance purposes;

To evaluate an application to use our Services;

To conduct manual or systematic monitoring for fraud and other harmful activity;

To respond to inquiries, send service notices and provide customer support;  
For audits, regulatory purposes, and compliance with industry standards;  
To develop new products;  
To send marketing communications;  
To improve or modify our Services; and  
To conduct aggregate analysis and develop business intelligence that enables us to operate, protect, make informed decisions, and report on the performance of, our business.

b. **Other Data.** We may use Other Data for a range of different purposes, provided we comply with applicable law and our contractual commitments. In some countries (for example, European Economic Area countries), local legal regimes may require us to treat some or all of Other Data as “personal data” under applicable data protection laws. Where this is the case, we will process Other Data only for the same purposes as Personal Data under this privacy policy.

## 4. How We Disclose Data.

The Company does not sell or rent Personal Data to marketers or unaffiliated third parties. We share Your Personal Data with trusted third parties, including:

a. **To Company Affiliates.** We share Data with entities worldwide that we control, are controlled by us, or are under our common control, to provide our Services. Flame Technologies is the party responsible for overall management and use of the Data by these affiliated parties

b. **To Company Service Providers.** We share Data with service providers who help us provide the Services. Service providers help us with things like payment processing (i.e., banks, credit bureaus, payment method providers), website hosting, data analysis, information technology and related infrastructure, customer service, email delivery, and auditing;

c. **To Our Users.** We share Data with Users (such as merchants and application providers) as necessary to process payments or provide the Services.

d. **To Authorized Third Parties.** We share data with parties directly authorized by a User to receive Data, such as when a User authorizes a third party application provider to access the Customer’s account. The use of Data by an authorized third party is subject to the third party’s privacy policy

e. **To Third Parties.** We will share Data with third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings); and

f. **Safety, Legal Purposes and Law Enforcement.** We use and disclose Data as we believe necessary: (i) under applicable law, or payment method rules; (ii) to enforce our terms and conditions; (iii) to protect our rights, privacy, safety or property, and/or that of our affiliates, You or others; and (iv) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside Your country of residence.

## 5. Your Rights and Choices.

You have choices regarding our use and disclosure of your Personal Data:

(a) Opting out of receiving electronic communications from us. If you no longer want to receive marketing-related emails from us, you may opt-out via the unsubscribe link included in such emails. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages that are required to provide you with our Services.

(b) How you can see or change your account Personal Data. If You would like to review, correct, or update Personal Data that You have previously disclosed to us, You may do so by signing in to your account or by emailing us.

(c) Your data protection rights. Depending on your location and subject to applicable law, you may have the following rights with regard to the Personal Data we control about you:

(i) The right to request confirmation of whether the Company processes Personal Data relating to you, and if so, to request a copy of that Personal Data;

(ii) The right to request that the Company rectifies or updates your Personal Data that is inaccurate, incomplete or outdated;

(iii) The right to request that the Company erase your Personal Data in certain circumstances provided by law;

(iv) The right to request that the Company restrict the use of your Personal Data in certain circumstances; and

(v) The right to request that we export to another company, where technically feasible, your Personal Data that we hold in order to provide Services to you. Where the processing of your Personal Data is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your Personal Data on grounds relating to your particular situation.

In order to exercise your data protection rights, you may contact the Company. We take each request seriously. We will comply with your request to the extent required by applicable law. We will not be able to respond to a request if we no longer hold your

Personal Data. If you feel that you have not received a satisfactory response from us, you may consult with the data protection authority in your country. For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. If we no longer need to process Personal Data about you in order to provide our Services or our Sites, we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.

## **6. Security.**

We use reasonable organizational, technical and administrative measures to protect Personal Data within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If You have reason to believe that Your interaction with us is no longer secure (for example, if You feel that the security of Your account has been compromised), please contact us immediately.

## **7. International Data Transfers.**

We are a global business. Personal Data may be stored and processed in any country where we have operations or where we engage service providers. We may transfer Personal Data that we maintain about you to recipients in countries other than the country in which the Personal Data was originally collected, including to the United States. Those countries may have data protection rules that are different from those of your country. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your Personal Data remains protected to the standards described in this Privacy Policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Data.

If you are located in the European Economic Area (“EEA”) or Switzerland, we comply with applicable laws to provide an adequate level of data protection for the transfer of your Personal Data to the US.

## **8. Choice and Access.**

You have choices regarding our use and disclosure of Your Personal Data:

a. Opting out of receiving electronic communications from us. If You no longer want to receive marketing-related emails from us on a going-forward basis, You may opt-out via the unsubscribe link included in such emails. We will try to comply with Your request(s) as soon as reasonably practicable. Please note that if You opt-out of

receiving marketing-related emails from us, we may still send You important administrative messages that are required to provide You with our Services.

b. How You can access or change Your Personal Data. If You would like to review, correct, or update Personal Data that You have previously disclosed to us, You may do so by signing in to Your account or by contacting us

If emailing us Your request, please make clear in the email what Personal Data You would like to have changed. For Your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that You use to send us Your request, and we may need to verify Your identity before implementing Your request. We will try to comply with Your request as soon as reasonably practicable.

## **9. Retention Period.**

We will retain Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. Please note that we have a variety of obligations to retain the Data that You provide to us, including to ensure that transactions can be appropriately processed, to help identify fraud, and to comply with anti-money laundering and other laws and rules that apply to us and to our financial service providers. Accordingly, even if You close Your Account, we will retain certain Data to meet our obligations. There may also be residual Data that will remain within our databases and other records, which will not be removed.

## **10. Use of Services by Minors.**

The Site is not directed at children under the age of 18, and we request that they not provide Personal Data through the Services. We operate our websites in compliance with the Children's Online Privacy Protection Act and will not knowingly collect or use personally identifiable information from anyone under 18.

## **11. Jurisdiction and Cross-Border Transfer.**

Our services are global and Data (including Personal Data) may be stored and processed in any country where we have operations or where we engage service providers, and we may transfer Data to countries outside of Your country of residence, including the United States, which may have data protection rules that are different from those of Your country. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that Your Data remains

protected to the standards described in this privacy policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access Your Personal Data.

(a) Residents of the European Economic Area (EEA) and Switzerland. To exercise your rights, please contact us.

(b) California residents. If you are a California resident, then, subject to certain limits under California law, you may ask us to provide you with (i) a list of certain categories of Personal Data we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year; and (ii) the identity of those third parties. To make this request, California residents may contact us.

(c) Australian residents. If you are an Australian resident, and you are dissatisfied with our handling of any complaint you raise under this Privacy Policy, you may wish to contact the Office of the Australia Information Commissioner.

## **12. Flame Technologies as a Data Processor.**

We may collect, use and disclose certain Personal Data about Customers when acting as the User's service provider. Our Users are responsible for making sure that the Customer's privacy rights are respected, including ensuring appropriate disclosures about third party data collection and use. To the extent that we are acting as a User's data processor, we will process Personal Data in accordance with the terms of our agreement with the User and the User's lawful instructions.

## **13. Updates to this Privacy Policy and Notifications.**

We may change this Privacy Policy. The "Last updated" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy on the Services.

We may provide You with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on our website and, if You are a User, by contacting You through your email address and/or the physical address listed in Your account. You agree that electronic disclosures and notices have the same meaning and effect as if we had provided You with hard copy disclosures. Disclosures and notices in relation to this Privacy Policy or Personal Data shall be considered to be received by You within 24 hours of the time they are posted to our website or, in the case of Users, sent to through one of means listed in this paragraph.

## **14. Contact Us**

If You have any questions about this Privacy Policy, please contact us:

[contact@flametoken.io](mailto:contact@flametoken.io)

Flame Technologies

Address: [contact@flametoken.io](mailto:contact@flametoken.io)

Attention: Flame Technologies Legal

Because email communications are not always secure, please do not include credit card or other sensitive Data (such as racial or ethnic origin, political opinions, religion, health, or the like) in Your emails to us.