

KIN FOUNDATION

Privacy Policy

Last modified: March 8, 2019

Introduction

At Kin Foundation ("**Foundation**" or "**We**"), we respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website, www.kin.org (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- on this Website.
- in email, text, and other electronic messages between you and this Website.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by the Foundation or any third party, including our members.
- any third party (including our members, including through any application or content such as advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Privacy Policy. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at privacy@kin.org.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- by which you may be personally identified, such as name, postal address, email address, telephone number, or any other identifier by which you may be contacted online or offline ("**personal information**").
- that is about you but individually does not identify you, such as your internet protocol address.
- about your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- directly from you when you provide it to us.
- automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

Information You Provide to Us

The information we collect on or through our Website may include:

- information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material, or requesting further services. We may also ask you for information when you report a problem with our Website.
- records and copies of your correspondence (including email addresses), if you contact us.
- your responses to surveys that we might ask you to complete for research purposes.
- your search queries on the Website.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical data and may include personal

information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- estimate our audience size and usage patterns.
- store information about your preferences, allowing us to customize our Website according to your individual interests.
- speed up your searches.
- recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications on the Website, including advertisements, are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We use information held about you in the following ways:

Information you give to us

We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us, and to provide you with the information, products and services that you request from us.
- to notify you about changes to our service.
- to ensure that content from our sites is presented in the most effective manner for you and for your computer.

Information we collect about you

We will use this information:

- to administer our sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer.
- to allow you to participate in interactive features of our service, when you choose to do so.
- as part of our efforts to keep our site safe and secure.

Information we receive from other sources

We will combine this information with information you give to us and information we collect about you, such as Aggregated Statistical Information from use of the Kin SDK. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Disclosure of Your Information

You agree that we have the right to share your personal information with selected third parties including:

- analytics and search engine providers that assist us in the improvement and optimization of our site.
- ecommerce providers such as payment solution providers to assist us in the processing of your online purchases, donations, and other payments.

We will disclose your personal information to third parties:

- in order to complete third-party financial, technical and legal audits of our operations as part of that review.
- in connection with a merger, financing, acquisition, dissolution transaction, bankruptcy or proceeding involving sale, transfer, divestiture of all or a portion of our business or assets. If another company acquires our business or assets, that company will have your information collected by us and will assume the rights and obligations regarding your information as allowed by this Privacy Policy.

We may also disclose your personal information:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- to enforce or apply our terms of use www.kin.org/terms-of-use and other agreements, including for billing and collection purposes.
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Kin Foundation, our customers, or others.

EUROPEAN USERS

For citizens of the European Union, you should know that Kin Foundation is a controller and a processor of your personal information. The legal bases for which we collect and use the information described above depends on what the information is and why we collected it. The four bases upon which we rely include:

- **Contract.** This means we need the information to perform our contract with you. For example, when you initiate a Kin transaction, we use information in order to make sure you are correctly credited or debited the Kin you've earned or spent.
- **Legitimate Interests.** This means we have a legitimate interest that does not outweigh your privacy rights. When we collect and process information based on our legitimate interests, we consider how we can accomplish what we need to in a way that is the least obtrusive on your privacy. For example, to make sure you are satisfied with how the Services work, troubleshoot technical problems or develop new features, we collect and use information about how you and others use the Services; and to respond to your inquiries, we collect and use information in that request and, if relevant to the inquiry, information about how you access and use the Services.
- **Legal Obligation.** We may need to use your personal information to comply with a law enforcement preservation request, subpoena, or other legal process or to protect the rights of other users.

- **Consent.** If we have no other legal basis for collecting or using your information, we will ask you for consent for a specific purpose. If we do, you have the right to withdraw consent at any time. Withdrawing your consent will not apply to any processing conducted in reliance on lawful processing bases other than consent.

EU Users' Rights

In addition to other rights detailed in the policy (such as requesting deletion, correction or updating of your personal information), EU citizens have certain rights regarding your personal information, including:

- *Right to Object or Restrict Processing.* You have the right to object to or restrict our use of your personal information for direct marketing purposes or under certain circumstances when the legal bases for using your information is based upon our legitimate interest. If you wish to object to our use of your information, you can send us a request to delete your account by clicking [here](#)
- *Right to Erasure.* You have the right to have your personal data erased and no longer processed. You can send us a request to delete your personal information by clicking [here](#) . Upon receiving the request, we will make a reasonable effort to delete your personal information from our internal network within a reasonable period of time as long as we are not obligated to preserve your information due to things like law enforcement preservation requests, subpoenas, investigations, litigation, or otherwise meet any of our other legal obligations. We may also retain depersonalized information after deletion.
- *Data Portability.* You can exercise your right to export your personal data by clicking [here](#).
- *File a Complaint.* You have the right to complain to the data protection authority located in your Member State. To find contact details, click [here](#) .

How We Respond to Do Not Track Signalsinfo@kinecosystem.com

We do not currently respond to “do not track” signals or other mechanisms that might enable you to opt out of tracking on our Website.

Third-Party Websites

The Website may contain links to third-party websites. When you click on a link to any other website or location, you will leave the Website and go to another site, and a third party may collect personal information or other information from you. We have no control over, do not review, and are not responsible or liable for, these third-party websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these third-party websites or their content, or to any collection of your personal information after you click on links to any such third-party websites. We encourage you to read the privacy policies of every website you visit. The links to third-party websites or locations are provided merely as a convenience and do not

signify or imply our endorsement of, or association with, such third parties or their products, services, content, or websites. You use any such links and the products, services, and content accessed thereby at your own discretion and at your own risk.

Access to Information

You can also request access, updating, and corrections of inaccuracies in other personal information we have by emailing or writing to us at privacy@kin.org. We may ask you for certain information in order to verify your identity.

We limit access to personal information we collect to only those employees who require such information to handle matters relating to compliance, identity verification and customer support.

Data Transfers

Our servers and our service providers may be located in the United States, Canada, and Israel, or other countries. Because of this, your personal information may be available to the U.S., Canadian, Israeli or other governments or their agencies under a lawful order made in that country. The laws of those countries may be less strict regarding your personal information than the laws where you live.

Personal information collected in the EU may be transferred to, and stored at, a destination outside of the EU and processed by employees operating outside of the EU who work for us, one of our business partners, or service providers. When we transfer personal information across country borders, we will make sure there is a transfer mechanism in place to transfer the data in a manner consistent with that described in this Privacy Policy.

Amendments to This Privacy Policy

Be sure to check back often for the latest information on our privacy practices. When we update this Privacy Policy, we will change the “Last Updated” date above. In addition, we may notify you of changes to this Privacy Policy by email.

NOTICE TO CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

(AS PROVIDED BY CALIFORNIA CIVIL CODE SECTION 1798.83)

A CALIFORNIA RESIDENT WHO HAS PROVIDED PERSONAL DATA TO A BUSINESS WITH WHOM HE/SHE HAS ESTABLISHED A BUSINESS RELATIONSHIP FOR PERSONAL, FAMILY, OR HOUSEHOLD PURPOSES (A “CALIFORNIA CUSTOMER”) MAY REQUEST INFORMATION ABOUT WHETHER THE BUSINESS HAS DISCLOSED PERSONAL INFORMATION TO ANY THIRD PARTIES FOR THE THIRD PARTIES’ DIRECT MARKETING PURPOSES. IN GENERAL, IF THE BUSINESS HAS MADE SUCH A DISCLOSURE OF PERSONAL DATA, UPON RECEIPT OF A REQUEST BY A CALIFORNIA CUSTOMER, THE BUSINESS IS REQUIRED TO PROVIDE A LIST OF ALL THIRD PARTIES TO WHOM PERSONAL DATA WAS DISCLOSED IN THE PRECEDING CALENDAR YEAR, AS WELL AS A LIST OF THE CATEGORIES OF PERSONAL DATA THAT WERE DISCLOSED. CALIFORNIA CUSTOMERS MAY

REQUEST FURTHER INFORMATION ABOUT OUR COMPLIANCE WITH THIS LAW BY E-MAILING PRIVACY@KINECOSYSTEM.ORG. PLEASE NOTE THAT WE ARE REQUIRED TO RESPOND TO ONE REQUEST PER CALIFORNIA CUSTOMER EACH YEAR AND WE ARE NOT REQUIRED TO RESPOND TO REQUESTS MADE BY MEANS OTHER THAN THROUGH THIS E-MAIL ADDRESS.

Privacy Contact

If you have any questions, comments, complaints or suggestion, please contact us at:

Kin Foundation
Attention: Privacy Office
c/o 137 Glasgow Street, Suite 525
Kitchener, ON N2G 4X8
privacy@kin.org

For Kin SDK Developer Terms [click here](#)