



PRIVACY POLICY

This privacy policy ("Privacy Policy") complies with data and privacy protection requirements when transferring personal data from the European Union (or "E.U.") to the United States in support of transatlantic transactional activity¹; and, also explains how personal information is collected, used, shared, and protected by Conotoxia, Inc. ("Conotoxia" or "Company") when you access or use any website to which this Privacy Policy is posted or linked, including our website located at: <https://conotoxia.com/en-us>

Conotoxia's Privacy Policy also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information. In this Privacy Policy, "you," "your," and "yourself" refer to the person who accesses or uses our Services. When we use the words, "personal information," we are referring to information that personally identifies you.

This Privacy Policy is part of our Terms and Conditions available at <https://conotoxia.com/en-us/terms-conditions>. If you do not agree to every provision of this Privacy Policy, our Terms and Conditions and the Privacy Shield Principles articulated below, you may **OPT OUT** by (i) clicking on the **OPT OUT BOX** and then (ii) by disengaging and refraining from further accessing, browsing, or using our Services.

APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy applies to your use of our Services (regardless of the means of access). You may use our Services via applications on any computer or mobile device, including, without limitation, a desktop computer, laptop, mobile phone, tablet, or other consumer electronic device (each, a "Device").

PROTECTING CHILDREN'S PRIVACY

We do not permit users to access our Services who are under the age of 13. As such, our Services are not designed nor intended to be attractive to children under the age of 13. We do not knowingly collect personal information from children under the age of 13. If you are under the age of 13, please do not access, use, or browse our Services or submit any personal information to us.

INFORMATION WE COLLECT

Information You Provide to Us

In general, you can visit our Site and download our App without telling us who you are or revealing any personal information about yourself. When you contact us or provide

¹ Note that on July 12, 2016, the European Commission deemed the European Union – United States (E.U. – U.S.) Privacy Shield Framework adequate to enable data transfers under E.U. law generally and specifically complies with the collection and processing of the personal data from individuals residing in the E.U within the legal framework established under the General Data Protection Regulation. The Privacy Shield Program, which is administered by the U.S. Department of Commerce's International Trade Administration, enables U.S. based companies and organizations to join the Privacy Shield Framework in order to benefit from the European Commission's data transfer adequacy determination. To join the Privacy Shield Program and Framework, a U.S.-based company will be required (i) to self-certify to the Department of Commerce through posting this Privacy Policy to the Department's website, which includes the required certification language; and (ii) publicly commit to complying with Privacy Shield Framework requirements.



information via our Services, such as when you register for a Conotoxia account, we may collect information that you provide to us. Such information may include your personal information, such as your name, street address, email address, mobile phone number, date of birth, and payment account information (collectively, your “Personal Information”). By providing your Personal Information to us, you expressly agree to our collection, use, and storage of your Personal Information as described in this Privacy Policy.

When you register for a Conotoxia account, we may ask you to create log-in credentials for your Conotoxia account, such as a username (email), password, and personal identification number (or “PIN”), as applicable.

Information About Your Transactions

We may collect information about the transactions you perform with our Services, such as the name, address and date of birth of the recipient of the money remittance.

Information from Third Parties

We may collect information about you from other from third parties, such as credit bureaus, consumer reporting agencies, and identity verification services.

Information Collected Automatically

We may automatically collect information from your Device when you use our Services. Such information includes information about your Device (such as the Device type, operating system, settings and system configurations, IP address, Device ID and other unique Device identifiers, and mobile network information) and your activity using our Services (such as data about the webpages you access, traffic to and from websites, the dates and times associated with transactions, web log data, and other event information, including crashes and system activity).

If we collect location information from your Device, we will notify you prior to this collection. You may control or disable the sharing of location information via your Device settings. If you disable location services, the performance of some of our Services may be limited or not to work at all.

Information that we collect automatically from your Device includes information that may identify you as well as statistical information that does not identify you. Some statistical information may be correlated with your Personal Information and your Conotoxia Account.

Information Collected Through Cookies and Similar Technologies

When you access or use our Services, we may place small data files on your Device that assign random, unique numbers to your Device to enable us to recognize your Device when you use our Services. These data files may be cookies, pixel tags, other local shared objects, or similar technologies provided by your browser or associated applications (collectively, “Cookies”). We use Cookies to recognize your Device, manage and store your settings and preferences for our Services, improve our Services, offer targeted products and services to you, and collect and analyze information about your use of our Services.

COOKIES POLICY

The cookies policy applies to all websites and applications for mobile devices that belong to companies affiliated with Cinkciarz.pl Sp. z o.o. and entities offering services on the web portal available at Conotoxia.com.

What are cookies?

A cookie is a small piece of data sent from a website and stored in your web browser while you are browsing that website. Every time you load the website, the browser sends the cookie back to the server to notify the website of your previous activity. *Source: en.wikipedia.org*

What do we use cookies for?

Cookies are used for the following purposes:

- to enable the use of the Client Panel,
- to enable access to the Partnership Programme,
- to adjust the service to the user's preferences,
- to obtain anonymous data concerning the way in which the website is used,
- to make it easier for users to navigate the service,
- to ensure security standards.

Both 'permanent' and 'session' cookies are used by Cinkciarz.pl. "Permanent" cookies remain on the Internet browser of the given device. They are either removed by the user or removed automatically after a predefined time, which determined in the parameters of cookies. 'Session' cookies remain on the browser until the session is terminated or the user logs out.

Cookies are also used by the entities cooperating with CONOTOXIA HOLDING Sp. z o.o. - Google Inc. We use Google Analytics, Google Places API, and YouTube, which share a common privacy policy. Additionally, we use Hotjar. For full information on privacy policies, please refer to the product pages:

- [Privacy policy of Google, Google Places API, YouTube](#)
- [Privacy policy of Hotjar](#)

Management of Cookies

All the up-to-date browsers allow to enable or disable the cookie mechanism (by default it is usually enabled). If the user does not wish to receive cookies, s/he can change the settings of the browser.

More information concerning the change of cookie settings for specific browsers is available on the following websites:

- [Chrome](#)



- [Firefox](#)
- [Internet Explorer](#)
- [Opera](#)
- [Safari](#)

Instructions for mobile devices:

- [Android](#)
- [Blackberry](#)
- [iOS \(Safari\)](#)
- [Windows Phone](#)

HOW WE USE INFORMATION WE COLLECT

The use of your Personal Information is subject to this Privacy Policy and our Terms and Conditions. The provisions contained herein supersede all previous notices or statements regarding our privacy practices with respect to our Services.

We may use aggregated, non-Personal Information for research and commercial purposes, such as to improve our Services so that they are more useful and accessible to you.

We may use your Personal Information to:

- Provide our Services and notices related thereto
- Provide customer support for our Services
- Detect and protect against errors, fraud, or other criminal activity
- Resolve disputes and enforce our Terms and Conditions
- Collect fees and other amounts owed in connection with our Services
- Compare information for accuracy and verify it with third parties
- Analyze, customize, and improve our Services
- Deliver targeted marketing and promotional offers
- Contact you by email message, voice call, or text message, as authorized by our Terms and Conditions and subject to applicable law (please note that standard telephone minute, text message, and data charges may apply if we contact you, and you are responsible for such charges)

To assist you in completing the registration process and to avoid having to input again your personal information, we retain information.

HOW WE SHARE INFORMATION

We do not share your Personal Information with: (i) other financial companies for joint marketing purposes; (ii) affiliated companies for their everyday business purposes; or (iii) any third parties so they can market to you, without your prior express consent.

We may share your Personal Information with unaffiliated third parties: (i) if you request or authorize it; (ii) if the information is provided to help complete a transaction for you; (iii) if



the information is provided to: (A) comply with applicable laws, rules, regulations, governmental and quasi-governmental requests, court orders, or subpoenas, including, but not limited to, national security or law enforcement requirements; (B) enforce our Terms and Conditions or other agreements; or (c) protect our rights, property, or safety or the rights, property, or safety of our users or others (e.g., to a consumer reporting agency for fraud protection); (iv) if the disclosure is done as part of a purchase, transfer, or sale of services or assets (e.g., in the event that substantially all of our assets are acquired by another party, your Personal Information may be one of the transferred assets); (v) if the information is provided to our third-party vendors or service providers to perform functions on our behalf (e.g., analyzing data, providing marketing assistance, providing customer service, processing orders, etc.); provided, that our agreements with such third parties require them to only use your Personal Information to provide services on our behalf and not for their own benefit; (vi) for our everyday business purposes; or (vii) as permitted by applicable law or otherwise described in this Privacy Policy. In some cases, such third parties and their facilities may be located outside of the United States. When you are no longer our customer, we continue to share your information as described in this Privacy Policy.

We may disclose your public, aggregated, or otherwise non-Personal Information, such as usage statistics of our Services, to third parties.

ACCESSING YOUR PERSONAL INFORMATION

You must notify us of any change in your Personal Information by updating your Conotoxia account profile through our Services. Any changes will affect only future uses of your Personal Information.

Subject to applicable law, which might, from time to time, oblige us to store your Personal Information for a certain period of time (typically five (5) years as required by regulatory recordkeeping retention rules), we will respect your wishes to correct inaccurate Personal Information. Otherwise, we will hold your Personal Information for as long as we believe it will help us achieve our objectives as detailed in this Privacy Policy.

You may ask us whether we are storing your Personal Information and you may ask to receive a copy of that Personal Information. Before sending you any of your Personal Information, we will ask you to provide proof of your identity. If you are unable to provide proof of your identity, we reserve the right to refuse to send you any Personal Information. We will respond as quickly as we can to your requests for details of Personal Information, we retain about you.

SECURITY

We have administrative, technical, and physical safeguards in place in our physical facilities and in our computer systems, databases, and communications networks that are reasonably designed to protect information contained within our systems from loss, misuse, or alteration. When your payment account information is transmitted via our Services it will be protected by encryption technology.

We care about the security of your information; however, no method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee the absolute



security of your Personal Information as you also play a role in protecting your Personal Information. Please safeguard your username, password, and PIN for your Conotoxia account and do not share them with others. We reserve the right, in our sole discretion, to refuse to provide our Services, terminate Conotoxia accounts, and to remove or edit content and Personal Information to the extent permitted by applicable law.

LINKS TO THIRD-PARTY WEBSITES

When you use our Services, you may be directed to other websites that are beyond our control. We may also allow third-party websites and applications to link to our Services. We are not responsible for the privacy practices of any third parties or the content of linked websites, but we do encourage you to read the applicable privacy policies and terms and conditions of such parties or websites. This Privacy Policy only applies to our Services.

INTERNATIONAL TRANSFERS

Your Personal Information may be stored on computers and systems in the United States and the European Union. By using our Services, you consent to the collection and processing of your Personal Information in the European Union and the United States.

PRIVACY SHIELD PRINCIPLES NOTICE AND COMPLIANCE CERTIFICATION

Conotoxia participates in and certifies its compliance and adherence with the E.U. - U.S. Privacy Shield Principles and its related framework. Specifically, we comply with the Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. We have certified to the Department of Commerce that we adhere to the Privacy Shield Principles. Conotoxia is committed to subjecting all personal data received from the European Union to the requirements of the applicable Privacy Shield Principles.

Conotoxia is responsible for the processing of personal data it receives, under the Privacy Shield Principles. The Company complies with the Privacy Shield Principles for all onward transfers of personal data from the European Union, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Principles, Conotoxia is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Conotoxia may be required to disclose personal data in response to lawful requests by public authorities, including to meet U.S. national security or law enforcement requirements.

If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit the Privacy Shield website at: <https://www.privacyshield.gov/>.

In compliance with the E.U. - U.S. Privacy Shield Principles, we commit to resolving complaints about our collection or use of your personal information. Individuals in the European Union



with inquiries or complaints regarding our Private Shield policy should first contact us at the following website: <https://conotoxia.com/en-us/money-transfer/contact-us>.

We have further committed to referring unresolved Privacy Shield complaints to the E.U. data protection authorities. Contact details for the E.U. data protection authorities can be found at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. We will cooperate with the appropriate E.U. data protection authority during investigation and resolution of complaints brought under Privacy Shield. These recourse mechanisms are available at no cost to you. Please note that if your complaint is not resolved through these channels and when our dispute resolution processes have been exhausted, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel as more fully described at the Privacy Shield website.

CHANGES OR UPDATES TO OUR PRIVACY POLICY

Subject to applicable law, we may amend this Privacy Policy at any time and in our discretion by updating and posting a new version via our Services or by otherwise notifying you of the revised terms. When we modify this Privacy Policy, we will post the revised version via our Services and will update the date at the top of this Privacy Policy. Your use of our Services after any such change constitutes your unconditional agreement to this Privacy Policy, as amended. For this reason, we encourage you to frequently review our Privacy Policy.

DISPUTE RESOLUTION

Any questions or concerns regarding the use or disclosure of personal information should be directed to us at the address given below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information by reference to the principles contained in this Privacy Policy. For complaints that cannot be resolved between us and you, we have agreed to participate in the following dispute resolution procedures in the investigation and resolution of complaints to resolve disputes pursuant to the Safe Harbor Principles. For disputes involving all personal information received by us from the European Economic Area ("EEA"), we have agreed to cooperate with the data protection authorities in the EEA and to participate in the dispute resolution procedures of the panel established by the European data protection authorities.

CONTACTING US

If you have any questions regarding this Privacy Policy, or if you wish to ask us to delete, correct, or show you your Personal Information as provided above, please contact us at: <https://conotoxia.com/en-us/money-transfer/contact-us>.

EFFECTIVE DATE

This Privacy Policy is effective as of December 2019.