

# Gravity Privacy Policy

Last updated: July 15, 2020

This Privacy Policy describes how we collect, use and share your personally identifiable information (“**Personal Information**”) that we receive from you when you visit our website <https://gravity.tech/> and all associated sites (the “**Portal**”), the provision of our products and services (our “**Services**”) and our business operations.

This Privacy Policy covers our treatment of Personal Information that we gather when you are accessing or using our Portal and Services, but does not apply to the practices of companies we don’t own or control, or people that we don’t manage. When we mention “**Gravity Protocol**”, “**Gravity Tech**”, “**Gravity Hub**”, “**GravityHub**”, “**Gravity**”, “**we**”, “**us**” or “**our**” in this Privacy Policy, we are referring to the Gravity Protocol’s core team members mentioned in the Gravity White paper available at: <https://gravity.tech/docs/whitepaper.pdf>

**By using or accessing the Portal and the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.**

Remember that your use of our Portal and Services is at all times subject to the Terms of Use, which incorporates this Privacy Policy. Any terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms of Use.

## What information does Gravity collect?

**Information you provide to us:** We receive and store any information you knowingly provide to us, for example your blockchain account address, your name, e-mail address,

phone number, social media accounts, job, residency and third-party account credentials (for example, your log-in credentials for Facebook or other third party sites).

To sign up for an account on the Portal you have to provide us with your blockchain account address and then you get a user profile (“**Profile**”). Your Profile will be initially empty: we and other users will be able to see only your blockchain account address on your Profile, but you can post any information on your Profile further.

**You are agree that if you posted any personal information on your User profile, that data will be publicly available, and we and other users can use it in any way, commercial or non-commercial, including but not limiting to marketing activities, declaring that you have registered Profile on the Platform, coping and sharing your personal information published.**

Your Profile is protected by a password for your privacy and security. If you access your Profile via a third party site or service, you may have additional or different sign-on protections via that third party site or service. You must prevent unauthorized access to your Profile by selecting and protecting your password and/or other sign-on mechanism. appropriately and limiting access to your computer or device and browser.

You can provide us your third-party account credentials to us to verify your identity and/or social media accounts and post the results on your Profile. You understand some content and/or information in those accounts (“**Third Party Account Information**”) may be transmitted into your Profile with us and become publicly available. That Third Party Account Information transmitted to our Portal is covered by this Privacy Policy. Certain information may be required to register with us or to take advantage of some of our features.

**Google analytics:** We have integrated the components of Google Analytics (with anonymization function) on the Portal.

Google Analytics is a web analysis service that collects and analyses the data about the behavior of the Portal’s visitors. Among other things, it collects data on which you have come

to the Portal from (so-called referrers), which subpages of the Portal were accessed and how often and which period of time a subpage was viewed. A web analysis is mainly used to optimize the Portal and for the cost-benefit analysis of Internet advertising.

The operator of the Google Analytics is Google LLC, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA. Further information and Google's applicable privacy regulations can be found at <https://analytics.google.com/analytics/web/provision/> and <https://policies.google.com/privacy?hl=en>.

Opt Out: <https://tools.google.com/dlpage/gaoptout?hl=enand>

**Information collected automatically:** Whenever you interact with our Portal, we automatically receive and record technical data about your equipment, browser features, browsing actions and patterns, IP address assigned to your computer (or the unique device ID of your mobile device, or other unique identifier), the date and time of your visits, clickstream data, language, time zone and area code, geolocation data, device identification, "cookie" information, the type of browser and/or device you're using to access the Portal, the page or feature you requested and other information related to your visit.

**"Cookies"** are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device's acceptance of cookies, but this may prevent you from taking advantage of some of our features.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to use Cookies. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Site may not function fully or as intended. Information collected by cookies does not reveal your identity, but it can help us to improve our website performance.

*First Party Cookies:* the Portal may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Website and to provide and improve our services. The Portal uses this cookie:

<b>Cookie</b>	<b>Url</b>	<b>Type</b>	<b>Duration</b>
__cfduid	.gravity.tech	HTTPS	4 weeks

*Third Parties Cookies:* by using our Website, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on our Website for marketing and analytical purposes. These Cookies are not integral to the functioning of our website and your use and experience of our Website will not be impaired by refusing consent to them.

*Google Analytics cookies:* the information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. Google might transfer the personal information collected via this technical procedure to third parties.

You can prevent the storage of cookies by a corresponding setting of your browser software or by choosing appropriate menu in the Cookies pop-up at bottom of the Portal. However, please note that if you do this, you may not be able to use all the features of this website to the fullest extent possible. In addition, all cookies already set can be deleted at any time via the Internet browser or other software programs.

Our advertising partners may also transmit cookies to your browser or device, when you click on ads that appear on the Portal. Also, if you click on a link to a third party website or service, a third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren't responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Portal, and those third parties may not honor "Do Not Track" requests you have set using your browser or device.

**Information collected from other websites and do not track policy:** Through cookies we place on your browser or device, we may collect information about your online activity after you leave the Portal. Just like any other usage information we collect, this information allows us to improve the Portal and the Services and customize your online experience, and otherwise as described in this Privacy Policy. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Portal does not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Portal or the Services and after you leave.

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

## What Are Your Rights?

Under the Data Protection Legislation, you have the following rights:

- a) The right to access the personal data we hold about you.
- b) The right to have your personal data rectified or deleted.
- c) The right to restrict (i.e. prevent) the processing of your personal data.
- d) The right to object to us using your personal data for a particular purpose or purposes.
- e) The right to withdraw consent to our processing or (and) controlling your personal data.
- f) The right to data portability (if your data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business).
- g) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

If you need further information about your rights or lodge a complaint, please contact your local Data Protection Commissioner or European data protection supervisor

If you wish to exercise any of the rights set out above, please contact us via our e-mail [legal@gravity.tech](mailto:legal@gravity.tech). You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

## Will Gravity share any of the personal information?

We may share your Personal Information with third parties as described in this section:

**Information that's been pseudonymised:** We may pseudonymise (de-identify) your Personal Information so that you are not identified as an individual, and provide that information to our partners. We may also provide aggregate usage information to our partners (or allow partners to collect that information from you), who may use such information to understand how often and in what ways people use our Services, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage or de-identified information to a partner (or allow a partner to collect such information) in a manner that would identify you as an individual person.

**Affiliated businesses:** We may share Information that you provide to us with affiliated companies in order to provide you with the products and services you clearly indicated that you are interested in and only to the extent that it is related to such product or service. We have no control over the policies and practices of third party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies.

**Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you; for example, we may use a payment processing company to receive and process your credit card transactions for us. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

**User profiles and submissions:** Certain user profile information, including your name, e-mail, location, and any video, image or other content that such user has uploaded through the Portal or associated community groups, may be displayed to other users to facilitate user interaction within the Services or address your request for our services. Please remember that any content you upload, along with any Personal Information or content that you voluntarily disclose online in a manner other users can view (on Profile, discussion boards, in messages and chat areas, etc.) becomes publicly available, and can be collected and used by anyone. Your user name and (or) blockchain account address may also be displayed to other users if and when you send messages or comments or upload content and other users can contact you through messages and comments. Additionally, if you sign into the Services through a third party social networking site or service, your list of “friends” from that site or service may be automatically imported to the Services, and such “friends,” if they are also registered users of the Services, may be able to access certain non-public information you have entered in your Services user profile. Again, we do not control the policies and practices of any other third party site or service.

**Business transfers:** If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of the business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We reserve the right to access, read, preserve, and disclose any information that we believe is necessary to comply with law or court order; enforce or apply our Terms of Use and other agreements; or protect the rights, property, or safety of Gravity, our contributors, our users, or others.

We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

# Purposes and terms

We may use your Personal data to customize content for you that we think you might like, based on your usage patterns. We may also use it to improve the Services – for example, this data can tell us how often users use a particular feature of the Services, and we can use that knowledge to make the Services interesting to as many users as possible.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows to do so. For further information see the chart below:

Data collected	Why we collect the data	How Long we keep the data?
Information that you provide to us	User Profile customization Identification of the User Communication with the User, establishing feedback with the User Providing the User with effective client and technical support in case of problems related to the use of the Site Marketing and advertising activities Providing and managing your access to the Site Supplying our products and services to you	Determined by the following criteria: <ul style="list-style-type: none"> <li>• the purpose for which we are using it - we will need to keep the data for as long as is necessary for that purpose;</li> <li>• legal obligations - laws or regulation may set a minimum period for which we have to keep your Personal Data.</li> </ul>



	To comply with applicable laws, rules and regulations, and internal policies and procedures.	
Automatically collected Information	Personalising and tailoring your experience on the Site  Administering our business and the Site  For statistical monitoring and analysis	The Company deletes Personal Information upon expiration of 30 days from the moment of achievement of the purposes of processing, unless another term is stipulated by the current legislation.
Cookies	Personalising and tailoring your experience on the Site  Administering our business and the Site  For statistical monitoring and analysis	The Company deletes Personal Information upon expiration of 30 days from the moment of achievement of the purposes of processing, unless another term is stipulated by the current legislation.

## Miscellaneous

**Mailing:** We may communicate with you if you’ve provided us the means to do so. For example, if you’ve given us your email address, we may send you promotional email offers on behalf of other businesses, or email you about your use of the Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more interesting and improve our services. If you do not want to receive communications from us, please indicate your preference by unsubscribing.

**Children:** We do not knowingly collect or solicit personal information from anyone under the age of 18. If you are under 18, please do not attempt to register for the Portal or any Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 18, we will delete that information as

quickly as possible. If you believe that a child under 14 may have provided us personal information, please contact us at [legal@gravity.tech](mailto:legal@gravity.tech)

**Changes:** We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on the Gravity website and/or by some other means. If you use the Portal or the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

The information you can view, update, and delete may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at

## What if I have questions?

If you have any questions or concerns regarding the Portal, please send us a detailed message to [support@gravity.tech](mailto:support@gravity.tech), and we will try to resolve your concerns.