

PRIVACY POLICY

Last modified: September 2021

TABLE OF CONTENTS

1	WHAT IS THIS PRIVACY POLICY ABOUT?	1
2	WHO IS THE CONTROLLER FOR PROCESSING YOUR PERSONAL DATA?	2
3	FOR WHOM AND FOR WHAT PURPOSE IS THE PRIVACY POLICY INTENDED?	2
4	HOW AND WHAT TYPES OF PERSONAL DATA DO WE COLLECT AND PROCESS	2
	For more information about cookies as well as online tracking and online advertising techniques, see below under section.....	3
5	FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA.....	3
6	LEGAL BASIS FOR PROCESSING AND DISCLOSURE OF YOUR PERSONAL DATA	3
6.1	Lawful basis for processing your personal data	3
6.2	Sharing your personal information	3
6.3	Service Providers.....	4
6.4	Other Disclosures.....	4
6.5	Links to third party sites.....	4
6.6	How long we keep your personal data.....	4
7	Security.....	5
8	International Data Transfers	5
9	Your Rights	6
9.1	Right of Access	6
9.2	Your Right to Rectification and Erasure.....	6
9.3	Your Right to Restrict Processing	6
9.4	Your Right to Portability	7
9.5	Your Right to object to processing	7
9.6	Your Right to stop receiving marketing communications	7
9.6.1	8.7 Your Right to object to automated Decision Making and Profiling.....	7
9.7	Withdrawal of Consent	7
9.8	Exercising your rights	8
10	ONLINE TRACKING AND ONLINE ADVERTISING TECHNIQUES INCLUDING USE OF COOKIES	8
11	HOW CAN YOU CONTACT US?.....	11
12	HOW WE MAY CHANGE THIS PRIVACY POLICY?.....	11

1 WHAT IS THIS PRIVACY POLICY ABOUT?

This privacy policy (“**Privacy Policy**”) lists the data privacy practices and processes of DeFi Suisse Ltd, c/o S&K Partners AG, Samstagerstrasse 55, 8832 Wollerau, Switzerland (“**THORWallet**”, “**we**”, “**our**”, or “**us**”). Protection and security of the personal data of our users is very important to THORWallet, as is your trust in us and the services we provide. THORWallet is committed to

handling your personal data responsibly and in compliance with all legal requirements. The Privacy Policy describes how we collect, process, use, transfer, and secure your personal data when you access and use THORWallet.org (the “Website”) or any of our mobile applications (the “App”) which allow access to the THORChain blockchain from a mobile device (the Website and the App collectively the “Services”).

2 WHO IS THE CONTROLLER FOR PROCESSING YOUR PERSONAL DATA?

DeFi Suisse Ltd, c/o S&K Partners AG, Samstagerstrasse 55, 8832 Wollerau, Switzerland is the controller for THORWallet’s processing of your personal data under this Privacy Policy, unless we tell you otherwise in an individual case.

3 FOR WHOM AND FOR WHAT PURPOSE IS THE PRIVACY POLICY INTENDED?

This Privacy Policy applies to all persons whose personal data we process (hereinafter referred to as “you”) when you use our Services, regardless of which channel you use to contact us (e.g. on a website, in an app, via a social network, at an event, etc.). It applies to the processing of personal data that have already been collected and personal data that will be collected in the future.

4 HOW AND WHAT TYPES OF PERSONAL DATA DO WE COLLECT AND PROCESS

When you use the Website or the App to create a wallet, subscribe to notifications or newsletters, or report a problem with the Website or App or otherwise use our Services, we may collect, store and use certain personal data that you disclose to us.

The personal data we collect from you may include: your IP address, email address, feedback information as well as personal data you may disclose to us from time to time on a voluntary basis, such as your name, address and other contact details.

We shall also collect information about you when you visit and interact with the Website and/or App through the use of technologies such as cookies. The following are examples of information we may collect when you visit and interact with the Website and/or App:

- information about your device, browser or operating system;
- time zone setting;
- your IP address (Website and App);
- information about interactions you have with the Website (such as scrolling and clicks);
- information about the way you use and the actions you take within the Website;
- length of time on the Website and App and time spent within certain sections;
- response times; and
- download errors.

For more information about cookies as well as online tracking and online advertising techniques, see below under section

5 FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA

We use your personal data for the following purposes:

- Communication with you
- Provision, execution and administration (including support) of Services
- Marketing, improvement and maintenance of Services as well as services and product development
- Security and prevention
- Compliance with statutory and regulatory requirements
- Protection of rights

6 LEGAL BASIS FOR PROCESSING AND DISCLOSURE OF YOUR PERSONAL DATA

6.1 Lawful basis for processing your personal data

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- Where you have asked us to do so, or consented to us doing so;
- Where it is necessary for the performance of a Service or in order to take steps at your request prior to providing the Services;
- Where it is necessary for our legitimate interests (or those of a third party) and your fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation.

You will receive marketing messages from us by email if you have given us your consent to do so.

To unsubscribe from marketing emails at any time and without cost, please click on the unsubscribe link at the bottom of any marketing email. You may also contact us (info@thorwallet.org) to inform us if you do not wish to receive any marketing materials from us.

6.2 Sharing your personal information

Depending on how and why you provide us with your personal data, we may share it in the following ways:

- with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries;
- with selected third parties including business partners, suppliers and sub-contractors for the performance of any contract we enter into with them (see “Service Providers” below); or
- with analytics that assist us in the improvement and optimisation of the Services.

We may also disclose your personal data to third parties in the following events:

- if we were to sell or buy any business or assets, in which case we might disclose your personal data to the prospective seller or buyer of such business or assets;
- if THORWallet or substantially all of its assets are acquired by a third party, in which case personal data held by us about our users will be one of the transferred assets; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging personal data with other companies and organisations for the purposes of fraud protection and credit risk reduction.

6.3 Service Providers

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal data they need to fulfil the services we request, and we stipulate that they protect this information and do not use it for any other purpose. We take these relationships seriously and oblige all of our data processors to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights as a data subject.

6.4 Other Disclosures

During your use of the App, your app store provider and mobile network operator may also collect personal data about you regarding your use of the App such as your identity, your usage and location.

These third parties shall act as separate and independent controllers of that personal data and shall process it in accordance with their own privacy policy.

6.5 Links to third party sites

The Website and App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. We may also provide links to third party websites that are not affiliated with the Website and App. All third-party websites are out of our control and are not covered by this Privacy Policy. If you access third party sites using the links provided, the operators of these sites may collect personal data from you that could be used by them, in accordance with their own privacy policies. Please check these policies before you submit any personal data to those websites.

6.6 How long we keep your personal data

We will hold your personal data on our systems only for as long as required for the purposes of processing and compatible purposes, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your personal data: see 'Your Rights' below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

7 Security

THORWallet takes the protection of your personal data very seriously. We have put in place appropriate technical, organizational, physical, electronic and managerial security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, including use of secure servers, passwords and industry standard encryption for data both in transit and at rest.

Where we have given you a password or PIN code that enables you to access certain parts of our App, you are responsible for keeping this password or PIN code confidential. We ask you not to share a password or PIN code with anyone.

When first launching the App, it creates an individual encrypted digital wallet, i.e. a private key, for every user to store his/her crypto assets. THORWallet does not have, at any point in time, access to the user's private keys and funds. You are responsible for keeping your private key confidential. We ask you not to share your private key with anyone. If you lose or give away your private key, you lose or give away your crypto assets.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business, need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 International Data Transfers

Please note that some of our service providers and other recipients may be based outside of Switzerland and the European Economic Area (the "EEA"). These service providers may work for us or for one of our suppliers and may be engaged in, among other things, the fulfilment of your request for information, products and services, and the provision of support services.

Where we transfer your data to a service provider or other recipient that neither in Switzerland nor in the EEA we seek to ensure that appropriate safeguards are in place to make sure that your personal data is held securely and that your rights as a data subject are upheld. In such a case Transfers of personal data are either made:

- to a country recognised by the Swiss Federal Data Protection and Information Commissioner as well as the European Commission as providing an adequate level of protection; or
- to a country which does not offer adequate protection but whose transfer has been governed by the standard contractual clauses of the European Commission or by implementing other appropriate cross-border transfer solutions to provide adequate protection. Please note that such contractual arrangements can partially compensate for weaker or missing statutory protection but cannot rule out all risks completely (e.g. government access abroad).
- Data may also be transferred to countries without adequate protection in exceptional cases, for example if consent is granted, in connection with legal proceedings abroad, or if transfer is necessary for the processing of an agreement or in cases of other legal authorization or another exception exists.

By submitting your personal data, you agree to this transfer, storing or processing.

If you would like more information about how the mechanism via which your personal data is transferred, please contact info@thorwallet.org.

9 Your Rights

As a data subject you have a number of rights in relation to your personal data. Below, we have described the various rights that you have as well as how you can exercise them (provided that the applicable conditions are met and subject applicable statutory exceptions).

9.1 Right of Access

You may, at any time, request access to the personal data that we hold which relates to you (you may have heard of this right being described as a “subject access request”).

Please note that this right entitles you to receive a copy of the personal data that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal data lawfully. It is not a right that allows you to request personal data about other people, or a right to request specific documents from us that do not relate to your personal data.

You can exercise this right at any time by writing to us (info@thorwallet.org) and telling us that you are making a “subject access request”. You do not have to fill in a specific form to make this kind of request.

9.2 Your Right to Rectification and Erasure

You may, at any time, request that we correct personal data that we hold about you which you believe is incorrect or inaccurate. Please note that we may ask you to verify any new personal data that you provide to us and may take our own steps to check that the new data you have supplied us with is right.

You may also ask us to erase personal data that we control if you do not believe that we need to continue retaining it (you may have heard of this right described as the “right to be forgotten”). Although we will do everything to respect your request and personal data, it may not always be possible to erase all of your personal data as there may be legal requirements to keep certain personal data or technical limitations to the data we can delete.

There may also be legitimate interests in keeping certain personal data including, amongst others, if the personal data is required for the App to function. If this is the case, we will continue to process this personal data.

If erasure is not technically possible or we believe that we have a good legal reason to continue processing personal data that you ask us to erase, we will tell you this and our reasoning at the time we respond to your request.

You can exercise this right at any time by writing to us (info@thorwallet.org) and telling us that you are making a request to have your personal data rectified or erased and on what basis you are making that request. If you want us to replace inaccurate data with new data, you should tell us what that new data is. You do not have to fill in a specific form to make this kind of request.

9.3 Your Right to Restrict Processing

Where we process your personal data on the basis of a legitimate interest, you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

You may also ask us to stop processing your personal data (a) if you dispute the accuracy of that personal data and want us verify that data's accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

You can exercise this right at any time by writing to us (info@thorwallet.org) and telling us that you are making a request to have us stop processing the relevant aspect of your personal data and describing which of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request.

9.4 Your Right to Portability

Where you wish to transfer certain personal data that we hold about you, which is processed by automated means, to a third party, you may write to us and ask us to provide it to you in a commonly used machine-readable format.

Because of the kind of work that we do and the systems that we use, we do not envisage this right being particularly relevant to the majority of individuals with whom we interact. However, if you wish to transfer your data from us to a third party we are happy to consider such requests.

9.5 Your Right to object to processing

You may object to processing of your personal data where we rely on legitimate interest for processing that personal data. We will comply with your request unless we have a compelling overriding legitimate interest for processing or we need to continue processing your personal data to establish, exercise or defend a legal claim.

9.6 Your Right to stop receiving marketing communications

To unsubscribe from receiving marketing messages at any time, please click on the unsubscribe link at the bottom of any marketing email and update your notification preferences in the App. For details on your rights to ask us to stop sending you various kinds of communications, please contact us (info@thorwallet.org).

9.6.1 8.7 Your Right to object to automated Decision Making and Profiling

You have the right to be informed about the existence of any automated decision making and profiling of your personal data, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you.

9.7 Withdrawal of Consent

Where we are relying on consent to process your personal data, you may withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

9.8 Exercising your rights

When you write to us making a request to exercise your rights, we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information, then we may delay actioning your request until you have provided us with additional information (and where this is the case, we will tell you).

For contact information to make a request or exercise your right, see also below under section 11.

10 ONLINE TRACKING AND ONLINE ADVERTISING TECHNIQUES INCLUDING USE OF COOKIES

We use various techniques on our Website that allow us and third parties engaged by us to recognize you during your use of our Website and possibly to track you across several visits. This Section informs you about this.

In essence, we wish to distinguish access by you (through your system) from access by other users, so that we can ensure the functionality of the website and carry out analysis and personalization. We do not intend to determine your identity, even if that is possible where we or third parties engaged by us can identify you by combination with other data. However, even without registration data, the technologies we use are designed in such a way that you are recognized as an individual visitor each time you access the website, for example by our server (or third-party servers) that assign a specific identification number to you or your browser (so-called «cookie»).

Cookies are individual codes (for example a serial number) that our server or a server of our service providers or advertising partners transmits to your system when you connect to our website, and that your system (browser, cell phone) accepts and stores until the set expiration time. Your system transmits these codes to our server or the third-party server with each additional access. That way, you are recognized even if your identity is unknown.

Whenever you access a server (for example when you use the Website, or because an e-mail includes a visible or invisible image), your visits can therefore be «tracked». If we integrate offers from an advertising partners or a provider of an analysis tool on our Website they may track you in the same way, even if you cannot be identified in a particular case.

We use these technologies on our Website and may allow certain third parties to do so as well. However, depending on the purpose of these technologies, we may ask for consent before they are used. You can access and change your current settings here [\[link\]](#). You can also set your browser to block or deceive certain types of cookies or alternative technologies, or to delete existing cookies. You can also add software to your browser that blocks certain third-party tracking. You can find more information on the help pages of your browser (usually with the keyword «Privacy») or on the websites of the third parties set out below.

We distinguish the following categories of «cookies» (including other technologies):

- **Necessary cookies:** Some cookies are necessary for the functioning of the Website or for certain features. For example, they ensure that you can move between pages without losing information that was entered in a form. They also ensure that you stay logged in. These cookies exist temporarily only («session cookies»). If you block them, the Website may not work properly. Other cookies are necessary for the server to store options or information (which you have entered) beyond a session (i.e. a visit to the website) if you use this function (for example language settings, consents, automatic login functionality, etc.). These cookies have an expiration date of up to 12 months. The legal basis for such cookies is our legitimate interest to provide you with all functions of our Website.
- **Performance cookies:** In order to optimize our Website and related offers and to better adapt them to the needs of the users, we use cookies to record and analyze the use of our Website, potentially beyond one session. We use third-party analytics services for this purpose. Before we use such cookies, we ask for your consent and the legal basis for such cookies is your consent. You can withdraw consent at any time through the cookie settings here [link]. Performance cookies also have an expiration date of up to 12 months.
- **Advertisement Cookies:** We and our advertising partners have an interest in targeting advertising as precisely as possible, i.e. only showing it to those we wish to address. We have listed our advertising partners below. For this purpose, we and our advertising partners – if you consent – use cookies that can record the content that has been accessed. This allows us and our advertising partners to display advertisements that we think will interest you on our Website, but also on other websites that display advertisements from us or our advertising partners. These cookies have an expiration period of a few days to 12 months, depending on the circumstances. If you consent to the use of these cookies, you will be shown related advertisements. If you do not consent to them, you will not see less advertisements, but simply any other advertisement. The legal basis for such cookies is your consent. You can withdraw consent at any time through the cookie settings here [link].
- **Functional Cookies:** Functional cookies help to perform certain functionalities like sharing the content of the website on social media platforms, collect feedbacks, and other third-party features.
- **Analytical Cookies:** Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc.
- **Other Cookies:** Other uncategorized cookies are those that are being analyzed and have not been classified into a category as yet.

In addition to marketing cookies, we use other technologies to control online advertising on other websites and thereby reduce advertising wastage. For example, we may transmit the e-mail addresses of our users to whom we wish to display advertisements to operators of advertising platforms (for example social media). If these persons are registered with them with the same e-mail address (which the advertising platforms determine by a matching process), the providers display our advertisements specifically to these persons. The providers do not receive e-mail addresses of persons who are not already known to them. In case of known e-mail addresses, however, they learn that these persons are in contact with us and the content they have accessed.

We may also integrate additional third-party offers on our website, in particular from social media providers. These offers are deactivated by default. As soon as you activate them (for example by clicking a button), their providers can determine that you are using our website. If you have an account with the

provider, it can assign this information to you and thereby track your use of online offers. The providers process this data as separate controllers.

We currently use offers from the following service providers and advertising partners (where they use data from you or cookies set on your computer for advertising purposes):

- **Google Analytics:** Google LLC is the provider of the service «Google Analytics». For the purposes of the GDPR and the Swiss Data Protection Act (DPA), Google Ireland Ltd. is the controller (both «Google»). Google tracks the behavior of visitors to our Website (duration, page views, geographic region of access etc.) through performance cookies (see above) and on this basis creates reports for us about the use of our Website. We have configured the service so that the IP addresses of visitors are truncated by Google in Europe before forwarding them to the United States and then cannot be traced back. Google provides us with reports and may therefore be considered our processor, but it also processes data for its own purposes. Google may be able to draw conclusions about the identity of visitors based on the data collected, create personal profiles and link this data with the Google accounts of these individuals. You should assume that this processing takes place if you consent to the use of performance cookies. Information about data protection with Google Analytics can be found here [<https://support.google.com/analytics/answer/6004245>] and if you have a Google account, you can find more details about Google's processing here [<https://policies.google.com/technologies/partner-sites?hl=en>].
- **Facebook Custom Audiences:** Our Website may also make use of **Facebook Pixel** and similar technologies of Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland («Facebook»). We make use of these technologies in order to only display the Facebook ads activated by us to users on Facebook and at partners cooperating with Facebook (so-called «audience network», www.facebook.com/audience-network) who have displayed an interest in us or whose features correspond to those that we communicate to Facebook for this purpose (such as interests in specific topics or products that become evident from the websites visited; «custom audiences»). We can also monitor the effectiveness of Facebook ads via these technologies for statistical and market research purposes by seeing whether users are forwarded to our website after clicking on a Facebook ad (so-called «conversion measurement»). Further details concerning this can be found [here](#).

We are jointly responsible with Facebook for the exchange of data that Facebook receives or collects via Facebook Pixel or comparable functions, for the display of advertising information corresponding to the interests of users, for the improvement of advertisement delivery, and for the personalization of functions and contents (but not for further processing). We have therefore concluded a [supplementary agreement](#) to this effect with Facebook. Users may accordingly submit requests for information and other inquiries from data subjects in connection with this joint responsibility directly to Facebook.

The detailed list of all necessary cookies, performance cookies and marketing cookies used on our Website and their specific expiration period can be found on the Website in the cookie settings.

11 HOW CAN YOU CONTACT US?

If you have any questions or concerns relating to this Privacy Policy or the processing of your personal data, please contact us as follows:

DeFi Suisse Ltd

c/o S&K Partners AG
Samstagerstrasse 55
8832 Wollerau
Switzerland

[info@thorwallet.org]

You may also contact our data protection coordinator using the following contact details:

DeFi Suisse Ltd
Att. Data Protection Coordinator

c/o S&K Partners AG
Samstagerstrasse 55
8832 Wollerau
Switzerland

[privacy@thorwallet.org]

12 HOW WE MAY CHANGE THIS PRIVACY POLICY?

THORWallet, in its sole discretion, may modify or update this policy at any time, especially if we change our data processing activities or if new legal provisions become applicable, so you should review this page periodically. The version published on the website is the current version.

Last updated: 22.09.2021