

Poppie Finance

Privacy Policy

Last Updated: February 10, 2023

Introduction

This policy (the “Privacy Policy”) applies to the Poppie.io website and mobile application, owned and operated by Poppie Finance, Inc. This Privacy Policy will inform you as to how Poppie Finance, Inc. and its affiliates (collectively, “Poppie,” we, us, our) handle your personal information when using any of our products, services, or applications (together, the “Services”) or when visiting or using our websites or mobile applications (collectively, “Site”). We have created this Privacy Policy to tell you what information we collect, how we use that information, and who we will share that information with, if at all.

By visiting or using the Services and Site, you agree to this Privacy Policy's terms and the accompanying Terms of Use. We encourage you to read the Privacy Policy and use its information to help you make informed decisions.

Please note that our Services and Site are not intended for minors below the age of 18 years, and we do not knowingly collect data relating to children.

1. Important Information

Purpose of this Privacy Policy

Poppie complies with and respects all privacy laws, including, when applicable, the Right to Financial Privacy Act, the Gramm-Leach-Bliley Act (“GLBA”), and the California Consumer Privacy Act (“CCPA”), among others. This Privacy Policy describes your privacy rights and how you can exercise those rights.

It is important that you read this Privacy Policy so that you understand how and why we are using your information. This Privacy Policy supplements other notices or policies; It does not override them. If you do not agree with our policies and practices, you should not use our Services or Site. By accessing or using our Services or Site, you agree to this Privacy Policy and consent to our data practices described below.

Changes to the Privacy Policy and Your Duty to Inform Us of Changes

We review and update our Privacy Policy from time to time. Please refer to the effective date at the top to determine when the most recent version took effect. Your continued use of our Services or Site after we make changes constitutes acceptance of those changes. Therefore you should periodically check the policy for updates. It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes.

Third-Party Links

The Site may include links to third-party websites, plug-ins, and applications ("Third-Party Sites"). Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control Third-Party Sites and are not responsible for their privacy and data security practices. When you leave our Site, we encourage you to read the privacy notice of every Third-Party Site you visit or use.

2. Information We Collect About You

Personal information is a broadly defined term. It can include any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. It does not include data where identifying information has been removed (de-identified data).

The definition of personal information includes the specific pieces of personal information described below. Depending on whether and how you use our Services or Site, we may collect, use, store, and transfer different kinds of personal information about you, which we have grouped into categories as follows:

Identity Data—full name, maiden name, last name, and title; username or a similar online identifier; date of birth and gender; and identity cards, passports, driving licenses, or other forms of identification.

Social Identity Data—your group/company data, referral information related to you, political background, close connections, behavioral data, risk assessment, and compliance assessment.

Contact Data—residence details, billing address, delivery address, home address, work address, email address, telephone numbers, and proof of address documentation.

Financial Data—bank account, payment card details, virtual currency accounts, stored value accounts, amounts associated with accounts, external account details, and source of funds and related documentation.

Transactional Data—details about payments to and from you and other details of any transactions you enter using our Services or Site.

Investment Data—information about your investment objectives, investment experience, and prior investments.

Technical Data—internet connectivity data; internet protocol (“IP”) address; operator and carrier data; login data; browser type and version; device type, category, and model; time zone setting and location data; language data; application version and SDK version; browser plug-in types and versions; operating system and platform; diagnostics data such as crash logs and any other data we collect to measure technical diagnostics.

Profile Data—your username and password; your identification number as our user; information on whether you have a Poppie account and the email(s) associated with your accounts; requests by you for products or services; your interests, preferences, and feedback; other information you generate when communicating with us, for example when you send a request to our customer support.

Usage Data—information about how you use the Site, the Services, and other offerings made available by us, including device download time, install time, interaction type and time, and event time, name, and source.

Marketing and Communications Data—your preferences in receiving marketing material from third parties or us, your communication preferences, and your survey preferences.

Certain personal information may be sensitive and used only in accordance with applicable law.

We may also collect, use, and share anonymized or de-identified information, including statistical or demographic data, for any purpose (“Aggregate Consumer Information”). For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, suppose we combine or connect Aggregate Consumer Information with your personal information so that it can directly or indirectly identify you. In that case, we treat the combined data as Personal Information according to applicable law.

If You Refuse to Provide Personal Information

Where we need to collect personal information by law or under the terms of a contract we have with you, and you refuse to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you, including the ability to offer or provide or continue to provide Services or other functionality.

3. How We Collect Your Personal Information

We use different methods to collect information from and about you, including:

Direct Interactions. You may give us your Identity Data, Social Identity Data, Contact Data, Financial Data, Profile Data, and Marketing and Communications Data by directly interacting with us—such as by filling in forms. This includes personal information you provide when you:

- Visit the site;
- Apply for, access, or attempt to access the Services;
- Create or modify an account;
- Subscribe to our publications;
- Use any of the Services;
- Request marketing materials;
- Enter a competition, promotion, or survey, including through social media;
- Give us feedback or contact us.

Automated Technologies or Interactions. As you interact with us via our Site, we will automatically collect Technical Data about your equipment, browsing actions, activity, and patterns. We collect this data using cookies, server logs, and other similar technologies. We will also collect Transactional Data, Investment Data, and Usage Data. We may also receive Technical Data and Marketing and Communications Data about you if you visit other websites employing our cookies. You may find more information about how we use cookies and adjust your particular preferences through the Cookie Preferences section on the Site.

Third-Parties or Publicly Available Sources. We also obtain information about you, including Social Identity Data, from third parties or publicly-available sources. These sources may include:

- Fraud and crime prevention agencies;
- Customer referring you;
- Public blockchains;
- Marketing partners and analytics providers;
- Other publicly available databases and information.

4. How We Use Your Personal Information

We will only use your Personal Information according to applicable law and this Privacy Policy. In general, we use Personal Information in the following ways:

- To provide Services;
- When in our legitimate interests and your interests and fundamental rights do not override those interests;

- To comply with a legal obligation;
- For business purposes in accordance with this Privacy Policy.

When you use our Services, our authorized partners may collect categories of personal information about you and use this data for their purposes. This activity may qualify as a sale under the California Consumer Privacy Act (“CCPA”). Under the CCPA, you can choose to allow or prevent such uses.

Common Purposes for Which We May Use Your Personal Information

More specifically, we may use your Personal Information to:

- Register you as a new customer;
- Carry out legal and compliance obligations;
- Process and deliver the Services and any features and functionality;
- Prevent abuse of our Services and Site;
- Manage our relationship with you—including notifying you about changes to our terms or Privacy Policy, asking you to leave a review, take a survey, or keeping you informed of our business and product development;
- Keep our records updated and evaluate how customers use our Services;
- Manage, process, collect, and transfer payments and fees;
- Collect and recover amounts owed;
- Ensure proper management of our payments, fees, and charges and collection and recovery of amounts owed;
- Manage risk and crime prevention—including performing anti-money laundering, counter-terrorism, sanction screening, fraud, and other background checks;
- Detect, investigate, report, and prevent financial crime broadly—including obeying applicable laws and regulations and responding to and resolving any complaints;
- Administer and protect our company, our Services, the Site, and social media channels, including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data;
- Generate data analytics to improve our website, our Services, marketing, and customer experience;
- Record voice calls and other conversations for compliance, quality assurance, and training purposes.

Marketing

We aim to provide choices regarding personal information uses, particularly around marketing and advertising.

Opting Out

You can ask us to stop sending you marketing messages anytime by following the opt-out links on any marketing message sent to you—typically an email. Further, you can directly inform us that you prefer not to receive marketing messages by emailing legal@poppie.xyz.

When you opt-out of receiving these marketing messages, this will not apply to service messages directly related to using our Services—including (but not limited to) changes to our terms and conditions or this Privacy Policy.

Cookies

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Services or Site may become inaccessible or not function properly. For more information about the cookies we use, please review the Cookie Preferences available on the Site.

Sale or Transfer of Business

We may need to process your Personal Information in connection with or during the negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction, or proceeding involving all or a part of our shares, business, or assets.

5. Disclosures of Your Personal Information

We may share your Personal Information with our third-party service providers, agents, subcontractors, other associated organizations, and our group companies and affiliates to complete tasks, provide the Services, make the Site available to you, and otherwise fulfill our obligations. When using third-party service providers, we request they preserve your personal information's security and treat it in accordance with the law.

We may also share your Personal Information and other data you provide to:

- Verify your identity;
- Detect and prevent fraud, money laundering, terrorist financing, and other financial crimes or illicit activities;
- Facilitate services and relevant business operations that support our Services;
- Improve our information, technology, and security systems;
- Improve our websites and mobile applications;
- Provide customer service;
- Promote our Services if you submit a product review or post content on public areas of our Services or social media accounts;

- Transfer our rights and duties under the relevant terms and conditions governing the use of any Services (to the extent allowed);
- Comply with a legal request or protect or enforce our rights;
- Comply with applicable law or regulation;
- Respond to a request for information if we believe disclosure is required under any applicable law, regulation, or legal process;
- Reduce and prevent actual or potential fraud, unauthorized transactions, claims, or other liability;
- Protect the rights, property, and safety of us or others;
- Evaluate, effectuate, or otherwise transfer your personal information as part of a proposed or actual sale, merger, restructuring, transfer, or exchange of all or a portion of our assets to another company.

The categories of third parties with whom we may share your personal information for the purposes listed above include:

- Companies and organizations that assist us in processing, verifying, or refunding transactions or orders;
- Identity verification agencies;
- Fraud or crime prevention agencies;
- Anyone to whom we lawfully transfer or may transfer our rights and duties under the relevant terms and conditions governing the use of any of the Services;
- Any third party because of any restructure, sale, or acquisition of our group or any affiliates;
- Regulatory and law enforcement authorities (when the law allows or requires it).

We disclose Personal Information to third parties according to applicable laws.

6. Personal Information Security

While there is inherent risk in sharing information over the internet, we maintain commercially reasonable security measures aimed at preventing your Personal Information from being accidentally lost, used, damaged, altered, disclosed, or accessed in an unauthorized or unlawful way.

In addition, we limit access to your Personal Information to those employees, agents, contractors, and other third parties who have a legitimate business need to know that information. They will only process your Personal Information on our instructions.

Please note that you are also responsible for taking reasonable steps to protect your information against unauthorized disclosure or misuse—including maintaining the confidentiality of your Personal Information and periodically changing your passwords.

We also have procedures to deal with suspected personal data breaches and will notify you and any relevant regulator of a qualifying breach when required.

7. Personal Information Retention

To determine the appropriate retention period for Personal Information, we will consider:

- The amount, nature, and sensitivity of the Personal Information;
- The potential risk of harm from unauthorized use or disclosure of Personal Information;
- The purposes for which we process your personal information and whether we can achieve those purposes through other means;
- Any applicable legal, regulatory, tax, accounting, or other requirements.

The following are exemplary factors that we usually consider in determining how long we need to retain your Personal Information and data:

- Whether we are dealing with a complaint;
- Whether we reasonably believe there is a prospect of litigation regarding our relationship with you;
- Whether we need it to comply with any applicable legal or regulatory requirements, including relevant sanctions regimes;
- Whether it is necessary for audit purposes;
- Whether relevant industry standards or guidelines require us to keep certain information;
- Our legitimate business needs to prevent abuse of any promotions that we launch.

If we consider that we need to keep information to defend possible future legal claims, the respective personal information (for example, emails, chats, letters, or other correspondence) will be kept in accordance with the statutory limitation period applicable following the end of our relationship.

Please note that under certain conditions, you can ask us to delete your Personal Information subject to certain conditions.

8. Your Legal Rights

Under some circumstances, you may have rights concerning your Personal Information, including:

- The right to know about Personal Information collected and how it is used and disclosed;
- The right to request correction of certain Personal Information;

- The right to request deletion of certain Personal Information;
- The right to opt-out of the sharing of certain Personal Information.

If you wish to exercise any of the rights set out above or want to raise a question, complaint, or concern about our privacy policy and Personal Information practices, please contact us at legal@poppie.xyz.

When allowed by applicable law and required, we will take steps to disclose and deliver to you, free of charge, your Personal Information. We may also contact you to ask you for further information about your request to speed up our response.

California residents also have the right to know about Personal Information sold. In addition, you may opt out of the sale of your personal information by clicking on the “Do Not Sell My Personal Information” link.

If you are a California resident, please also note that some of your Personal Information is subject to the Gramm-Leach-Bliley Act. Information we collect for the purposes of complying with the GLBA and its implementing regulations is not covered by the CCPA (and therefore may not be subject to deletion requests). However, your other Personal Information could still be subject to the CCPA.

Non-Discrimination

You will not receive discriminatory treatment if you choose to exercise any of the rights conferred to you above.

If you want to make a request under the CCPA through a natural person or a business entity authorized to act on your behalf, please contact us beforehand, and we will then provide you with a reply on how to designate such a person.

9. Children’s Privacy

Poppie makes all efforts to comply with the Children’s Online Privacy Protection Act (“COPPA”). We do not knowingly collect Personal Information from children under thirteen (13) years old. Please contact us if you are a parent or guardian and know that your child under the age of thirteen (13) has provided us with personally identifiable information. If we become aware that we have collected personally identifiable information from children without verification of parental consent, we will take steps to remove that information from our servers.

12. USA Patriot Act

To help the government fight money laundering and the funding of terrorism, the USA PATRIOT Act requires all financial institutions to obtain, verify, and record information that identifies each person and each legal entity that opens an account. When you or your firm opens an account, we will ask for information that allows us to ascertain your identity. If you are opening an account on behalf of a business entity, we may also request documents relating to its formation, existence, and authority.