



LEVERJ PRIVACY POLICY

Updated: October 13, 2020

LEVERJ services are not offered to US or UK Persons and OFAC sanctioned countries.

Edge.sh (“**Edge.sh**,” “**we**,” and “**us**”) understands your privacy is important and is committed to protecting it. Edge.sh provides this privacy policy (“**Privacy Policy**”) to help you understand how we collect, use, and disclose information collected or received through the Leverj website located at leverj.io (“**Site**”) or exchange located at live.leverj.io (“**Exchange**”). Together the “**Site**” and the “**Exchange**” constitute our “**Services**”.

BY ACCESSING and USING our Services, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY AND YOU EXPRESSLY CONSENT TO THE COLLECTION, USE AND DISCLOSURE OF INFORMATION COLLECTED ON OR THROUGH THE Services IN ACCORDANCE WITH THIS PRIVACY POLICY. You understand that by providing us Personal Data, you allow us to identify you. You may choose to not provide us with certain information, but some or all portions of the Services may not be available or may be limited as a result. If you do not agree to the terms of this Privacy Policy, you should immediately cease access or use of the Services.

1. **Types of Data.** Edge.sh may collect both Personal Data and Anonymous Data, each as defined below, to administer the Services.
 - 1.1. **Personal Data.** “Personal Data” means any information relating to an identified or identifiable natural person.
 - 1.2. **Anonymous Data.** “Anonymous Data” means any information that is not associated with or linked to your Personal Data and which on its own does not individually identify you.
2. **How We Collect and Use Information on the Exchange.**
 - 2.1. **Information You Submit.** When users register with the Exchange, Edge.sh records the user’s public Ethereum address and the digital receipt confirming acceptance of the terms and conditions. The Ethereum address and record of the digital receipt confirming acceptance of the terms and conditions are used to ensure that users are aware of and accept the terms and conditions for using the exchange. The public Ethereum address is used to secure and administer the Exchange. User’s Ethereum addresses and digital receipts confirming acceptance are registered with a smart contract on the Ethereum blockchain and therefore, are publicly available.

- 2.2. **Information Collected Automatically.** The Exchange automatically collects IP addresses, time when the Ethereum address is registered, and trading passes (also referred to as the api keys). Each IP address is read to verify that the country the user is located in is one of the countries where Edge.sh offers its services. IP addresses are masked to obscure precise location information and complete IP addresses are not permanently stored by Edge.sh. The trading passes are registered with a smart contract on the Ethereum blockchain and therefore, are publicly available.

3. How We Collect Information About You on the Site.

- 3.1. **Information You Submit.** In some cases, you may provide us with your email address so that we can communicate with you. When submitting your email address, you may also provide us with additional Personal Data. Leverj has a legitimate interest in maintaining the Personal Data of those who voluntarily communicate with us.
- 3.2. **Log Files.** The Site collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, browser type, and operating system.
- 3.3. **Cookies.** A cookie is a small text file that the Site saves on your computer when you visit the Site. When visiting the Site, the cookie is transmitted to the Site to develop a record of your online activity. In some cases, other websites will also recognise and utilise our cookies. This Site uses first-party cookies (cookies that are provided by Leverj) and third-party cookies (cookies that are provided by third party service providers like Google).
- 3.4. **Web Beacons.** Web beacons are transparent pixel images that are used to collect information about users' interaction with the Site.

4. How We Use Information About You.

- 4.1. **Information You Submit.** If you choose to provide us with your email address to communicate with us, we may retain your contact information and any additional information you provide us to respond to your inquiry; to notify you of important information relating to Leverj; or to keep a record of your inquiry or complaint.
- 4.2. **Cookies and Web Beacons.** We use cookies and web beacons to collect information about visitors to the Site including, but not limited to, pages visited on the Site, and access times to learn more about Site traffic patterns, customise marketing and to perform maintenance. Leverj has a legitimate business interest in providing Site functionality and understanding how visitors and customers use the Site. We also use this information to improve our internal operations and software, improve the Site, and to customise the Site for individual visitors. Although most browsers automatically accept cookies, you can change your browser options to stop automatically accepting cookies or to prompt you before accepting cookies. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this Site. To learn more about your ability to manage cookies and web beacons, review the privacy features in your browser.

5. How We Share Information.

- 5.1. **Our Service Providers.** We employ third-party companies and individuals to administer and provide services on our behalf (including, but not limited to, a cloud

service provider) who may need your information to provide services for us. These third-party service providers are restricted from using your information for any purpose other than to provide the services requested by Edge.sh.

- 5.2. **Other Disclosures.** We may disclose information collected through our Services: (i) to respond to subpoenas, warrants, court orders, lawful requests, or legal process, (ii) to establish or exercise our legal rights or defend against legal claims, or protect other users, (iii) in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, or as otherwise required by law, or (iv) to investigate, prevent, or take action regarding any violation of this Privacy Policy.
- 5.3. **Business Transfers.** As we develop our business, we might sell or buy businesses or assets. In the event we are acquired by or merged with a third party, we reserve the right to transfer or assign the information we have collected through our Services as a part of such merger, acquisition, sale, or other change of control. In an event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors' rights generally, information collected through our Services may be transferred by the trustee. If Edge.sh or any of its affiliates is acquired by or merged with a third party, that third party will possess the information in Edge.sh's or its affiliate's possession and will assume the rights and obligations regarding information as described in this Privacy Policy.
6. **Children.** Our Services are not designed for individuals under the age of 13 and Edge.sh does not knowingly collect any information from children under the age of 13. If we verify that a person under 13 has submitted information to the Exchange or Site, we will proceed to delete this information as soon as possible.
7. **How We Respond to Do Not Track.** We do not collect information about visitor's browsing activities across third-party websites or online services. Therefore, the Exchange and Site do not respond to Do Not Track signals.
8. **Data Protection for Users in Europe.** For purposes of the General Data Protection Regulation ("GDPR"), Leverj is the controller of your Personal Data. For more information on how you can contact us, please see Section 11 below.
 - 8.1. **Processing Your Data.** We internally process your Personal Data for our legitimate business interests, like improving Leverj products and services, in a manner that does not outweigh your fundamental rights and freedoms. When you provide your email to us, we will use that information to contact you. In some cases, we will use your Personal Data for direct marketing, in which case you have the right to object and opt-out to direct marketing.
 - 8.2. **Categories of Recipients of Your Personal Data.** We employ third-party service providers to administer and provide services on our behalf (including, but not limited to, a cloud service provider) who may need your Personal Data to provide services for us. These third-party service providers are restricted from using your Personal Data for any purpose other than to provide the services requested by Leverj.
 - 8.3. **Data Subject Rights.** The GDPR provides certain rights for individuals. You may request information about: the purpose of processing; the categories of Personal Data concerned; third parties that may have received your Personal Data from Leverj; the source of your Personal Data (if you didn't provide it directly to Leverj); and how long your Personal Data will be stored. You have a right to correct your Personal Data record maintained by Leverj if it is inaccurate. Subject to certain exceptions

(including, but not limited to, satisfying legal requirements), you may request that the Leverj erase your Personal Data or cease processing your Personal Data. You have the right to receive, or transmit to another controller, Personal Data concerning you that you have submitted to Leverj. Leverj will provide reasonable access to your Personal Data at no cost upon request and if access cannot be provided within a reasonable time frame, Leverj will provide you with a date when the information will be provided. If for some reason access is denied, Leverj will provide an explanation as to why access has been denied. In many countries, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how Leverj processes your Personal Data.

- 8.4. **Transferring Personal Data from the EU.** Leverj analyzes service logs outside of the EU. Leverj may analyze service logs in a country that has not received a finding of “adequacy” from the European Union under Article 45 of the GDPR. Leverj relies on derogations for specific situations as set forth in Article 49 of the GDPR. In particular, Leverj collects and transfers Personal Data only: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of Leverj when your rights and freedoms are not overriding.
- 8.5. **Data Storage and Retention.** Leverj uses cloud-based servers in the EU to store information about users of our Services. Leverj retains data for the duration of your business relationship with Leverj and for a period of time thereafter to satisfy legal requirements. For more information on where and how long your Personal Data is stored, and for more information on your rights of erasure and portability, please contact us at info@leverj.io.
9. **Changes to This Privacy Policy.** We may update this Privacy Policy from time to time to reflect changes or updates to our technology, data practices, service methods, or other factors. If we make material changes to this Privacy Policy, we will notify you by posting the revised Privacy Policy on our Site. Changes to the Privacy Policy will become effective immediately, unless otherwise noted. Your continued use of our Services following the effective date of these changes indicates your consent to the revised policies and practices. You are expected to check this page frequently so you are aware of any changes, as they are binding on you. If you object to any revisions, you should immediately cease using our Services.
10. **Questions.** If you have questions related to this Privacy Policy, please contact us at info@leverj.io.