

FLEXPOOL.IO

PRIVACY POLICY

Effective Date: 1 August 2021

1. INTRODUCTION

Flexpool.io Technologies Inc. ("**Flexpool**") is an incorporated company under the Business Corporations Act (British Columbia) with its registered office at 400 – 725 Granville Street, Vancouver, British Columbia, Canada, V7Y 1G5. Flexpool.io is a website and cryptocurrency mining platform operated by Flexpool that allows individual miners to pool their computing power to mine cryptocurrencies more effectively.

You means any person, whether an individual or a legal person, who uses Flexpool's website and/or platform to mine cryptocurrencies with Flexpool.

Flexpool respects your privacy and is committed to protecting it by complying with this policy (the "**Privacy Policy**").

The Privacy Policy describes:

- how we collect, use, disclose, and protect the personal information of our customers and website users ("**you**");
- describes the types of information we may collect from you or that you may provide when you visit the website, flexpool.io (our "**Website**"); and
- our practices for collecting, using, maintaining, protecting, and disclosing that information.

We will only use your personal information in accordance with this policy unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

Privacy laws in Canada generally define "personal information" as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person.

This policy applies to information we collect, use, or disclose about you:

- on this Website; and
- in email, text, and other electronic messages between you and this Website.

The Website may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

Please read this Privacy Policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you indicate that you

understand, accept, and consent to the practices described in this policy. This policy may change from time to time. Your continued use of this Website after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates.

2. INFORMATION WE COLLECT ABOUT YOU

We collect and use several types of information from and about you, including:

- **Personal information**, that we can reasonably use to directly or indirectly identify you, such as your e-mail address, cryptocurrency wallet address, and the Internet protocol (IP) address used to connect your computer to the Internet (the "**Personal Information**").

We provide an opportunity for any user to unsubscribe from our email notification list on an ongoing basis by e-mailing to privacy@flexpool.io.

- **Technical information**, including the IP addresses of your mining rigs, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Website, and usage details.
- **Non-personal details about your Website interactions**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Website (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from the page.

3. HOW WE COLLECT INFORMATION ABOUT YOU

We use different methods to collect your information, including through:

- **direct interactions with you when you provide it to us**, for example, by filling in forms or corresponding with us by phone, email, or otherwise; and
- **automated technologies or interactions**, as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies.

4. INFORMATION WE COLLECT THROUGH COOKIES AND OTHER AUTOMATIC DATA COLLECTION TECHNOLOGIES

As you navigate through and interact with our Website, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- details of your visits to our Website, including traffic data, location data, logs and other communication data and the resources that you access and use on the Website; and
- information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical data and does not include personal information and we may maintain it or associate it with personal information we that you provide

to us. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences, allowing us to customize our Website according to your individual interests; and
- recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings that are used for browser cookies.
- **Web Beacons.** Pages of our Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permits Flexpool, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

The list of cookies that are used on our website include:

- Google Analytics analytical cookies;
- Atlassian status page cookies; and
- Intercom cookies.

5. HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any Personal Information:

- to present our Website and its contents to you;
- to provide you with information, products, or services that you request from us;
- to fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it;
- to carry out our obligations and enforce our rights arising from any contracts with you, including for payment of rewards or to comply with legal requirements;
- to notify you about changes to our Website or any products or services we offer or provide though it;
- to improve our Website, products or services, marketing, or customer relationships and experiences;
- to verify mining equipment ownership;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

6. DISCLOSURE OF YOUR INFORMATION

We may disclose personal information that we collect or you provide as described in this Privacy Policy:

- to our subsidiaries and affiliates;
- in accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Flexpool's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Flexpool about our customers and users is among the assets transferred;
- to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy;
- to fulfill the purpose for which you provide it;
- for any other purpose disclosed by us when you provide the information; and
- with your consent.

We may also disclose your personal information:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law;
- to enforce or apply our [Terms of Use](#) and other agreements; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Flexpool, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

7. TRANSFERRING YOUR PERSONAL INFORMATION

We may transfer personal information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

By submitting your Personal Information or engaging with the Website, you consent to this transfer, storage, or processing.

8. DATA SECURITY

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

However, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

9. DATA RETENTION

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

10. WITHDRAWING YOUR CONSENT

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances.

To withdraw your consent, if applicable, contact us at privacy@flexpool.io. Please note that if you withdraw your consent we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.

11. CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page.

We include the date the privacy policy was last revised at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

12. CONTACT INFORMATION

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at privacy@flexpool.io.

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact us using the contact information listed above.