

Privacy Policy

Effective date: January, 2019

Digital Silo Pty Ltd ABN 97 626 208 393 ("us", "we", or "our") operates the <https://octowallet.com> website (the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <https://octowallet.com>

Definitions

Service

Service is the <https://octowallet.com> website operated by Digital Silo Pty Ltd ABN 97 626 208 393

Personal Data

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies

Cookies are small pieces of data stored on your device (computer or mobile device).

Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processors (or Service Providers)

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User)

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Date of birth
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

The purpose for which we collect personal data is to provide you with the best service experience possible on the Service and for our internal business purposes that form part of normal business practices. Some provision of personal data is optional. However, if you do not provide us with certain types of personal data, you may be unable to enjoy the full functionality of the Service.

Usage Data

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service. We send a session cookie to your computer when you log in to your User account. This type of cookie helps if you visit multiple pages on the Service during the same session, so that you don't need to enter your password on each page. Once you log out or close your browser, this cookie expires.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.
- **Longer-lasting Cookies.** We use longer-lasting cookies for other purposes such as to display your Content and account information. We encode our cookie so that only we can interpret the information stored in them. Users always have the option of disabling cookies via their browser preferences. If you disable cookies on your browser, please note that some parts of our Service may not function as effectively or may be considerably slower.

Use of Data

Digital Silo Pty Ltd ABN 97 626 208 393 uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Digital Silo Pty Ltd ABN 97 626 208 393 legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Digital Silo Pty Ltd ABN 97 626 208 393 may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- To comply with the law

Retention of Data

Digital Silo Pty Ltd ABN 97 626 208 393 will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Digital Silo Pty Ltd ABN 97 626 208 393 will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Digital Silo Pty Ltd ABN 97 626 208 393 may dispose of information in our discretion without notice, subject to applicable law that specifically requires the handling or retention of information. You must keep your own, separate back-up records.

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Australia and choose to provide information to us, please note that we transfer the data, including Personal Data, to Australia and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Digital Silo Pty Ltd ABN 97 626 208 393 will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of Data

Legal Requirements

Digital Silo Pty Ltd ABN 97 626 208 393 may disclose your Personal Data in the good faith belief that such action is necessary:

- To comply with a legal obligation
- To protect and defend the rights or property of Digital Silo Pty Ltd ABN 97 626 208 393
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Digital Silo Pty Ltd ABN 97 626 208 393 aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.

The right to object. You have the right to object to our processing of your Personal Data.

The right of restriction. You have the right to request that we restrict the processing of your personal information.

The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

The right to withdraw consent. You also have the right to withdraw your consent at any time where Digital Silo Pty Ltd ABN 97 626 208 393 relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Communications

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

Compliance with Laws

We may disclose personal Data in special situations where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring or interfering (intentionally or unintentionally) with our rights or property, users or anyone else who could be harmed by such activities.

We will disclose your Personal Data where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.

Business Transaction

In the event that we sell or buy businesses or their assets, or engage in transfers, acquisitions, mergers, restructurings, changes of control and other similar transactions, customer or user information is generally one of the transferable business assets. Thus, your personal data may be subject to such a transfer. In the unlikely event of insolvency, personal data may be transferred to a trustee or debtor in possession and then to a subsequent purchaser.

Access and Correction

Australian Privacy Principle 6 of the Privacy Act 1988 (Cth) allows you to get access to, and correct, the personal data we hold about you in certain circumstances. If you would like to obtain such access, please contact us on the details set out above.

Please note that the access and correction requirements under this Privacy Policy operates alongside and do not replace other informal or legal procedures by which an individual can be provided access to, or correction of, their personal data, including the requirements under the Freedom of Information Act 1982 (Cth).

Complaints

Australian Privacy Principle 1 of the Privacy Act 1988 (Cth) allows you to make a complaint about any alleged breaches of privacy. In order to lodge a complaint with us, please contact us using the details above with the following information:

- Your name and address;
- Details of the alleged breach of privacy; and
- URL link to the alleged breach of privacy (if applicable).

Please allow us 30 days to investigate your complaint, after which we will contact you immediately to resolve the issue.

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Consent

You warrant that you are able to give consents under Australian Law or, in the event that you do not have the capacity to give consent, you warrant that your guardian or attorney is able to give any consent required under this Privacy Policy on your behalf.

You hereby expressly and voluntarily grant your informed consent to us to deal with your personal data in accordance with the terms and conditions of this Privacy Policy. Should you retract your consent, please contact us. If you retract your consent, you acknowledge and agree that failure to provide certain types of personal data may not give you access to the full functionality of the Service.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

By email: support@octowallet.com

By visiting this page on our website: <https://octowallet.com>