UPHEAVAL.IO PRIVACY POLICY

Last updated: April 2, 2019

This Privacy Policy describes how Upheaval LLC (“upheaval.io”), a company organized under the laws of Washington with an address of 22722 29th Dr SE, Suite 100, Bothell, WA 98021 processes, collects, stores, shares, and protects your Personal Data whenever you use our website, or any of our software applications on mobile devices, tablets, or other electronic devices.

Throughout this Privacy Policy, we use the term “Personal Data” and “your data” to describe the aforementioned data that we collect. We store your Personal Data securely throughout the life of your account, unless you ask us to permanently delete it.

A. HOW UPHEAVAL.IO COLLECTS INFORMATION ABOUT YOU

When you use our Services, we collect information sent to us through your mobile device, tablet, computer, and other electronic devices.

Upheaval.io does not target its websites, mobile app, API, or any of our Services at children. Upheaval.io does not intentionally collect information from children. If we become aware that we have inadvertently received Personal Data from a user under the age of 13 (or any lower age pursuant to applicable law), we will delete such information from our records.

What information we collect:

If you create an account or use the upheaval.io application software or website, we require your consent to collect the following information:

- **User Account Information.** Your email address and password.
- **Contact Information.** Your name, birth of date, address, phone number.
- **Technical Information.** IP, login information, browser information, time zone setting, operating system, digital currency public key, and platform.
- **Information about Geo-location.** Real-time location-based information from your device at any time while you download or use Services. We may use this information to optimize your experience.
- **Transactions.** We collect information about your upheaval.io use, transactions and payment activity on our Site and Services. Information collected includes but is not limited to the amount, time, date, and wallet.
- **Cookies.** Like many websites and software services, we use “cookies.” Cookies are small programs that we transfer to your hard drive that allow us to recognize you and to provide you with a customized experience. If you do not want us to use cookies, you can easily disable them by going to the toolbar of your web browser and clicking on the “help” button. Follow the instructions that will prevent the browser from accepting cookies, or set the browser to inform you when you receive a new cookie. In addition, you may visit this and other websites anonymously through the use of utilities provided by other private companies.
• **Other Information.** Every computer and device has an IP (Internet Protocol) address. IP addresses of computers used to visit this site are noted. In addition, we automatically collect other information such as email addresses, browser types, operating systems, and the URL addresses of sites clicked to and from this site.

**B. HOW UPHEAVAL.IO PROTECTS AND STORES PERSONAL DATA**

Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purposed services requested by the customer.

We implement a variety of advanced security measures to maintain the safety of your personal information when you access your personal information.

**C. HOW UPHEAVAL.IO USES THE PERSONAL DATA WE COLLECT**

Any of the information we collect from you may be used only to personalize your experience. Having your information will help us better respond to your individual needs.

Additionally, we may use your information to:

• Help improve our application software and website and make it a better overall user experience.
• For communication purposes to send a periodic email to the e-mail address you provide us, such as our newsletter, any company updates or related gift card, product and service information. You can always unsubscribe if you do not wish to be contacted by us.
• Verify your identity and/or location to permit access to your accounts, gift card(s), transactions, and personal information and prevent fraud or illegal or unauthorized activity to enforce our user agreements and comply with laws and regulations.
• Business purposes such as data analytics, identifying user trends, and determining the effectiveness of marketing campaigns.
• Resolve disputes and troubleshoot any problems.
• In the event of a merger or acquisition or other purchase of upheaval.io assets by another company, the new company will have access to the information you provide and we will require that new entity follow the procedures of this Privacy Policy. We will notify you of any such changes.
• Customize, measure, and improve upheaval.io services and the content and layout of our website and applications.

We process your Personal Data on one or more of the following legal bases in accordance with applicable rules and regulations, including the General Data Protection Regulation (GDPR) in EU:

• With the consent from you, and/or;
• For our legitimate business purposes.

We will never use your Personal Data for any purpose other than what we have disclosed to you. You can revoke your consent to share your data with us at any time, however, we may not be able to continue offering you our services should you choose to do this.
- We will never sell or rent your Personal Data to any third parties.
- Any communications we send to you will either be related to your account or will be related to upheaval.io services or products.
- In the event upheaval.io sends any communication to you, which is not related specifically to your account, upheaval.io will provide you with an “unsubscribe” mechanism through which you may opt out of receiving other similar messages in the future.

**D. HOW UPHEAVAL.IO SHARES PERSONAL INFORMATION WITH OTHER PARTIES**

The only time we will share your data with another party is if we are required by law and are compelled to do so by subpoena, court order, or a similar legal procedure.

**E. SPECIFIC CONSENT BY USERS IN THE EUROPEAN ECONOMIC AREA**

The United States may not have protections in place for Personal Data as extensive as those within the EEA and may not provide adequate protection for Personal Data within the meaning of the GDPR. You may refuse to give or revoke your consent to this storage of your Personal Data at any time by emailing info@upheaval.io with the subject line “Revoke EEA data consent.” If you are an individual located in the EEA and you decline to consent, you will no longer be able to use upheaval.io.

**F. HOW YOU CAN CONTACT US ABOUT PRIVACY QUESTIONS AND EXERCISE YOUR DATA SUBJECT RIGHTS**

If you have questions or concerns regarding this policy, or if you have a complaint, you should first contact us on our support page by emailing info@upheaval.io

If you are located in, or a resident of, EEA, you have the following rights under EU data protection law:

- **Right of access**: You can request information about your Personal Data and request a copy of that data.
- **Right of rectification**: You can request that we correct or update your Personal Data if they are incomplete or incorrect by upheaval.io at any time by submitting a request to info@upheaval.io with the subject line “Revise Personal Information.”
- **Right to restriction**: You can request that we restrict the processing of your Personal Data.
- **Right to erasure**: You can request erasure of your Personal Data if the data are inaccurate or processed in a way that is incompatible with the purpose(s) pursued by us.
- **Right to data portability**: If we process your Personal Data on the basis of a contract with you or based on your consent, you can request to receive your Personal Data in a structured, commonly used and machine-readable format, and ask us to transfer such data to a third party, where technically feasible. Furthermore, if you wish to have a copy of your ledger in upheaval.io, you may download them by submitting a request to info@upheaval.io with the subject line “Download Ledger.”
- **Right to objection**: You can object to the processing of your Personal Data for direct marketing purpose at any time.
- **Right to lodge a complaint**: You can lodge a complaint with a competent supervisory authority in the EU situated at your habitual residence, place of work, or place of alleged infringement of the GDPR.

- **Right to refuse or withdraw your consent**: You can refuse to give and withdraw your consent to data processing at any time. You can also oppose the processing of your Personal Data, based on our legitimate interests, including profiling based on this provision, on compelling grounds relating to your particular situation at any time.

- **Right to deactivate/delete your account**: If you no longer wish to use our Services, you have the right to deactivate/delete your upheaval.io account by submitting a request to info@upheaval.io with the subject line “Deactivate/Delete Account.”

**G. HOW TO ACCESS AND EDIT YOUR INFORMATION**

If you need to access or edit your upheaval.io information, you can do so from the Settings or Account page after you have logged into your upheaval.io account. If you encounter any problems accessing or editing your personal information, contact us through our support links.

Thank you!