

## bloXroute Privacy Policy

Effective as of April 1, 2019.

This “Privacy Policy” describes the privacy practices of bloXroute Labs and our subsidiaries and affiliates (collectively, “bloXroute”, “we”, “us”, or “our”) and the rights and choices available to individuals with respect to their information in connection with the [www.bloXroute.com](http://www.bloXroute.com) website and any other website or online services that we own or control and which posts this Privacy Policy (any, a “Site”), as well as the bloXroute software and APIs that we provide to our customers.

bloXroute may provide additional or supplemental privacy policies to individuals for specific products or services that we offer. These supplemental privacy policies will govern how we may process the information in the context of the specific product or service.

### Personal Information We Collect

bloXroute is a blockchain distribution network that increases the speed at which blocks propagate. When we provide our services, we collect information that may be considered personal information in some jurisdictions, and we describe the information we collect in this Privacy Policy. Like any company, we may also process personal information for our own business purposes, such as when we collect and use business contact details of our prospective and current customers and investors. This Privacy Policy also describes our practices when we process personal information for our own purposes.

#### Information we collect via the Site and when you communicate with us

We collect the personal information described below through the Site or when you communicate with us. We do not collect these types of information through our blockchain distribution network when performing our services.

- **Personal and business contact information**, such as your first name, last name, mailing address, phone number, and email address
- **Feedback and correspondence**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us online
- **Profile information**, such as the username and password that you may set to establish an online account with us, and your preferences regarding our services and marketing communications
- **Demographic information**, such as your city, state, country, and postal code
- **Usage information**, such as information about how you use the Site and interact with us, including any information that you submit to us through the Site

#### Investor information

In addition to the information identified above, we or our service providers collect certain other information of individuals who chose to invest in bloXroute. This may include information that we or our service providers need to confirm your eligibility to invest with us (such as documentation necessary to confirm that you are an

accredited investor in accordance with applicable law and to confirm your identity for KYC purposes) and your method of payment for the investment.

### **Information we collect when providing our services**

We may collect information that is publicly available in a blockchain when providing our services, such as:

- Public wallet identifier of the sender and recipient of a transaction
- Unique identifier for a transaction
- Date and time of a transaction
- Transaction value, along with associated costs
- Status of a transaction (such as whether the transaction is complete, in-progress, or resulted in an error)

### **Cookies and other information collected by automated means**

We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity occurring on or through the Site. Our service providers and business partners may collect this type of information over time and across third-party websites. This information is collected using cookies, browser web storage, web beacons, and similar technologies, and our emails may also contain web beacons.

The information that may be collected automatically includes:

- Computer or mobile device operating system type and version number, manufacturer and model, device identifier, browser type, screen resolution, and IP address
- The website you visited before browsing to our website
- General location information such as city, state or geographic area from which you access our Site
- Information about your use of and actions on the Site, such as pages you viewed, how long you spent on a page, navigation paths between pages, information about your activity on a page, access times, and length of access
- Information about your engagement with our marketing communications, including whether you open the marketing emails we send you and the links you click within those emails

## **How We Use Your Personal Information**

### **Our Use of Personal Information for bloXroute's Own Business Purposes**

We use personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

- Provide, operate, and improve the Site, and develop new products and services
- Communicate with you about our company, the Site, our products and services, and promotional and educational programs and events
- Process investments the company, which may entail verifying your identity and taking steps to detect, prevent, and mitigate fraud
- Send you marketing or promotional communications

- Understand how you interact with our Site and our communications
- Personalize Site content and our communications
- Respond to your requests, questions and feedback

In addition, we may use your personal information as we believe necessary or appropriate to: (a) comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities; (b) protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); (c) enforce the terms and conditions that govern the Site; and (d) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity;

We may also process personal information to create de-identified data that is not associated with individuals. We may use this de-identified data and share it with third parties for our lawful business purposes.

### **Our Use of Personal Information When Providing Our Services**

When we provide our services, we may use the information we collect to provide, operate, and improve the services, and develop new products and services. We may also process personal information to create de-identified data that is not associated with individuals. We may use this de-identified data and share it with third parties for our lawful business purposes.

## **How We Share your Personal Information**

### **Affiliates**

We may share your personal information with our parent company, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

### **Service providers**

We may employ third party companies and individuals to administer and provide services on our behalf (such as customer support, hosting, email delivery, investor accreditation and KYC, and database management services). We require these third parties to use and share your personal information only as directed or authorized by us.

### **Professional advisors**

We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

### **Compliance with Laws and Law Enforcement; Protection and Safety**

bloXroute may disclose information about you to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern the Site; (d) protect our rights, privacy, safety or property, and/or that of you or others; and (e) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

## **Business Transfers**

bloXroute may sell, transfer or otherwise share some or all of its business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Policy.

## **Your Choices**

### **Access or update your information**

In some countries, applicable law may provide a right for an individual to access, update or correct personal information in our custody and control about that individual. Individuals may contact us directly at the contact information set out below to exercise applicable rights. We may request certain personal information for the purpose of verifying the identity of the individual seeking access to his or her personal information. We may not be able to provide access to, or correction of, your information in all circumstances

### **Marketing communications**

You may opt out of marketing-related emails by clicking on the opt-out or unsubscribe link at the bottom of each such email. You may continue to receive service-related and other non-marketing emails.

### **Targeted online advertising**

Some of the business partners that collect information about users' activities on our Site may be members of organizations or programs that provide choices to individuals regarding the use of their browsing behavior or mobile application usage for purposes of targeted advertising.

Users may opt out of receiving targeted advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above.

If you choose to opt-out of targeted advertisements, you will still see advertisements online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.

### **Do Not Track Signals**

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not currently respond to do not track signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

## **Security**

The security of your personal information is important to us. We employ a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

## **International Transfer**

bloXroute is headquartered in the United States and has service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, country or other governmental jurisdiction where privacy laws may not be as protective as those in your jurisdiction.

## **Other Websites and Services**

The Site may contain links to other websites and services. These links are not an endorsement, authorization or representation that we are affiliated with that third party. We do not exercise control over third party websites or services, and are not responsible for their actions. Other websites and services may follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies of the other websites you visit and services you use.

## **Changes to this Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Site.

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Site (or as otherwise indicated at the time of posting). In all cases, your continued use of the Site after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

## **Contact Us**

If you have any questions or concerns about our Privacy Policy or privacy practices, please feel free to email us at [privacy@bloXroute.com](mailto:privacy@bloXroute.com).