

# Privacy Policy

BY USING OR ACCESSING THE WEBSITES, SYSTEMS OR SERVICES OF ODINTOKEN YOU SIGNIFY YOUR ACKNOWLEDGEMENT AND ASSENT TO THE PRIVACY POLICY SET FORTH BELOW. IF YOU DO NOT AGREE TO THIS POLICY, PLEASE DO NOT USE ODINTOKEN'S WEBSITES, SYSTEMS OR SERVICES. PLEASE CHECK THIS POLICY PERIODICALLY FOR CHANGES.

## **Application of this Privacy Policy**

This Privacy Policy applies to your use of (regardless of means of access) any of the current set of ODINTOKEN products, collectively referred to as “ODINTOKEN’s Products”, such as our website ([www.odintoken.io](http://www.odintoken.io)), our App for Windows, our App for Mac, our Android app and our browser extensions. The ODINTOKEN Products are owned and provided by “Shinwa Asset Management “

You can access, download or use Odin Products, through applications on Devices, through APIs, and through third parties as set forth herein, in the Terms of Use section and in any Customer Agreement applicable to you. A “Device” is any computer used to access ODINTOKEN’s Products, including without limitation a desktop, laptop, mobile phone, tablet, or other consumer electronic Device.

## **Information collection**

We collect only user provided information. The application obtains the information you provide when you download and register the Application. Registration with us is optional. However, please keep in mind that you may not be able to use some of the features offered by the Application unless you register with us.

When you register with us and use the Application, you generally provide (a) your name, email address, password and other registration information, verified ID’s, pictures etc; (b) transaction-related information, such as when you make purchases, respond to any offers, or download or use applications from us; (c) information you provide us when you contact us for help; (d) information you enter into our system when using the Application. We may also use the information you provided us to contact you from time to time to provide you with vital information, required notices and future roadmaps.

## **Automatically Collected Information**

In addition, the Application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use the Application.

## **Third parties?**

Only anonymized data is periodically transmitted to external services to help us improve the Application and our service. We will share your information with third parties only in the ways that are described in this privacy statement.

## **We may disclose User Provided and Automatically Collected Information:**

As required by law, such as to comply with a subpoena, or similar legal process;

when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;

with our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement. If “Shinwa Asset Management” is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

## **Cookies**

We may use a variety of methods, including "cookies" to collect information.

### **Performance Cookies**

Odin Token collects cookies on our Sites and/or Services to capture information about page visits (e.g. “performance cookies.”) This information is anonymous and Odintoken uses this information only internally - to deliver the most effective content to our visitors. Information from the cookie is used to gauge page popularity, analyse traffic patterns on our Sites and/or Services and guide development of other improvements to our Sites and/or Services.

## **Targeting, Performance, and Functionality Cookies**

In our email programs, OdinToken may employ some tracking methods (e.g. “targeting, performance, and functionality cookies”). We track “opens” via a tracking pixel in the email—meaning we may track who opens our e-mail messages and when you open our e-mail messages; and we may track “clicks” via encoded URLs—meaning we track whether you click on the links contained in our e-mail messages. This information is used internally only to help us deliver relevant messaging, and is not shared with any third parties.

## **Functionality and Necessary Cookies**

OdinToken does not require that you accept cookies and/or you may withdraw your consent to our use of cookies at any time by adjusting your browser's privacy settings, however, some functionality on our Sites (e.g. “functionality cookies”), our product or service check-out process, and Services may be disabled if you decline to accept cookies ( e.g. “necessary cookies”).

## **Opting Out of Cookies**

By using the Sites and Services, you consent to the placement of the cookies referenced above.

In addition to using cookies and related technologies as described above, we also may permit certain third party companies to help us tailor advertising that we think may be of interest to users and to collect and use other data about user activities on our Sites and/or Services (e.g., to allow them to tailor ads on third party services). These companies may deliver ads that might also place cookies and otherwise track user behaviour. You may opt out of third-party companies use of cookies by visiting the Network Advertising Initiative opt-out page. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **Opt-out rights?**

You can stop all collection of information by the Application easily by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

## **Data Retention Policy, Managing Your Information**

If you'd like us to delete User Provided Data that you have provided via the Application, please contact us at [privacy@odintoken.io](mailto:privacy@odintoken.io) and we will respond in a reasonable time. Please note that some or all of the User Provided Data may be required in order for the Application to function properly.

## **Children**

We do not use the Application to knowingly solicit data from or market to children under the age of 18. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at [privacy@odintoken.io](mailto:privacy@odintoken.io). We will delete such information from our files within a reasonable time.

## **Security**

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Application. Please be aware that, although we endeavour provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

## **Changes**

This Privacy Policy is effective as of 1 July 2017 and will remain in effect, except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Web site after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided to us, or by placing a prominent notice on this page.

**Your Consent**

By using the Application, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. "Processing," means using cookies on a computer/hand held device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information.

**Contact us**

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at [privacy@odintoken.io](mailto:privacy@odintoken.io)