# **FIN NEXT Wallet Privacy Policy**

Last Updated: May 17, 2021

FIN NEXT Wallet is a mobile application browser service for the HERB Network (the "Network") distributed by FIN NEXT ("we" or "us" or "our") which allows users to broadcast messages & transactions and view addresses & information that are part of the Network (the "App" or "FIN NEXT Wallet"). This Privacy Policy ("Privacy Policy") helps explain how we collect, use, store, and protect your information when you use the App, our developer software. Please also read FIN NEXT Wallet's Terms of Service (the "Terms"), which describe the terms under which you use the Services.

### How we collect information about you

We receive or collect information when we operate and provide our Services, including when you install, access, or use our Services.

#### Information you provide

- Your Account Information In order to create a FIN NEXT Wallet account, you will provide us with a username. You may also voluntarily add other information, such as a profile name, profile picture, biography, or location.
- Your Messages and Contacts We do not retain your messages or your list of contacts in the ordinary course of providing our Services to you. Once your chat messages (including any text, photos, videos, voice messages, files, and share location information that may be attached to them) are delivered, they are deleted from our servers. Your messages and contacts are stored on your own device. If a message cannot be delivered immediately (for example, if you are offline), we may keep it on our servers until you are back online and the message is delivered. All messages sent through the Services are encrypted end-to-end, so even if we temporarily store them on our servers, neither we nor any third parties can read them. However, we may retain high level, anonymized message metrics and metadata (for example the total number of messages sent using the Services during a given month or year).
- Your Transactions Your Network private key, which you utilize to access your funds and initiate
  transactions, is stored only on your own device. However, to facilitate your transactions and
  provide you with your account balance, we store the Network public key address associated with
  your Network private key.
- Customer Support We may collect additional information you may disclose to our customer support team.

#### **Automatically collected information**

- Metrics and Performance Data We may collect service-related, diagnostic, and performance
  information. This includes high level information about your activity (such as how you use our
  Services and how you interact with others using our Services), and diagnostic, crash, website, and
  performance logs and reports.
- Device and Connection Information We may collect device-specific information when you
  install, access, or use our Services. This may include your IP address and, if you choose to allow
  push notifications through FIN NEXT Wallet, your device's unique push token.
- Status Information We may collect information about your online status on our Services, such as when you last used our Services (your "last seen status").

#### How we use the Information we collect

Our primary purpose in collecting information is to to help us operate, provide, improve, customize, support, and market our Services. We may use your information to:

- Provide the Services and customer support you request;
- Verify your account;
- Resolve disputes and troubleshoot problems;
- Prevent and investigate potentially prohibited or illegal activities, and/or violations of our posted Terms:
- Customize, measure, and improve the Services and the content and layout of our application; and
- Deliver targeted marketing and service update notices based on your communications preferences.
  - We will not use your information for purposes other than those purposes we have disclosed to you, without your permission.

### Marketing

We will never sell or rent your information to third parties.

Any communications we send to you will either be related to your account or will be related to the Services. In the event we send any communication to you which is not related specifically to your account, we will provide you with an "unsubscribe" mechanism through which you may opt out of receiving other similar messages in the future.

## How your information is shared with other FIN NEXT wallet users

If you use your account to send a message to or engage in a transaction with another user, that user will have access to your message content or transaction information, respectively. Users with whom you interact with may store or re-share your information with others, on or off of our Services. We, however, will never have access to your underlying messages or store your transaction information.

# How we share information with third-parties

We work with third-party providers to help us operate, provide, improve, customize, support, and market our Services. For example, we work with companies to distribute our apps, provide our infrastructure, delivery, and other systems. These providers may provide us information about you in certain circumstances; for example, app stores may provide us reports to help us diagnose and fix service issues.

We may also share information with law enforcement, government officials, or other third parties when:

- We are compelled to do so by a subpoena, court order, or similar legal procedure; or
- We believe in good faith that the disclosure of personal information is necessary to prevent
  physical harm or financial loss, to report suspected illegal activity or to investigate violations of
  our Terms.

Finally, we may share information with companies or other entities that we plan to merge with or be acquired by. Should such a combination occur, we will require that the new combined entity follow this

Privacy Policy with respect to your personal information. You will receive prior notice of any change in applicable policy.

#### How we use Cookies

When you access our Services, we may place small data files called cookies or pixel tags on your computer or mobile device.

We use these files to understand, secure, operate, and provide our Services. For example, we use cookies to:

- Provide all web-based Services, improve your experience, and understand how our Services are being used;
- Measure the effectiveness of our promotions; and
- Remember your choices and customize our Services for you

You can follow the instructions provided by your browser or device (usually located under "Settings" or "Preferences") to modify your cookie or pixel data settings. Please note that if you set your browser or device to disable cookies, certain of our Services may not function properly.

### How you can access or change your information

If you would like to manage, change, limit, or delete your information, you may do so by logging into FIN NEXT Wallet and tapping the more icon. You can change your profile name, profile picture, biography, and location information any time. You can also manage your contacts by tapping the Contacts icon.

You may delete your FIN NEXT Wallet account at any time. When you delete your account, your undelivered messages are deleted from our servers as well as any of your other information we no longer need to operate and provide our Services. Please remember that when you delete your account, it does not affect the information other users have relating to you, such as their copy of the messages you sent them. Please also note that FIN NEXT Wallet does not ever store your Network private key, so if you delete the application, make sure you have a copy of your private key elsewhere so that you may continue to access your Network funds.

# **Our global operations**

You agree to our information practices, including the collection, use, processing, and sharing of your information as described in this Privacy Policy, as well as the transfer and processing of your information to the United States and other countries globally where we have or use facilities, service providers, or partners, regardless of where you use our Services.

You acknowledge that the laws, regulations, and standards of the country in which your information is stored or processed may be different from those of your own country. However, we require our service providers to treat your information in strict confidence and use appropriate security measures to protect it. We also require them to uphold all obligations under this Privacy Policy.

# **Updates to our Policy**

We may amend or update our Privacy Policy from time to time. We will notify you of material changes to this policy by updating the last updated date at the top of this page, and we will provide you with explicit

notice of material changes as required by law. Your continued use of our Services confirms your acceptance of our Privacy Policy, as amended. If you do not agree to our Privacy Policy, as amended, you must stop using our Services. We recommend that you visit this page frequently to check for changes.

### **Contact Us**

If you have any questions about our Privacy Policy, please do not hesitate to contact us at support@finnext.io