

Effective Date: April 2, 2018

Vanbex
Website Privacy Notice

Vanbex Group Inc. (“Vanbex”) takes privacy and data security seriously. We are committed to transparency in the collection and use of your personal information. The Privacy Notice below describes how we use personal information, and the circumstances under which we may share this information. This Privacy Notice applies to the privacy practices of Vanbex on its websites located at: <https://www.vanbex.com/> and <https://etherparty.com/>.

Collection and Use of Personal Information

● **Account Creation:**

We collect your name, email address, mailing address, birthday, geographic location, mailing address and a username and password that you select to create an account with us. We use this information to administer your account, and to satisfy know-your-client, anti-money laundering and other industry compliance obligations. We may also use this information for fraud detection and prevention purposes.

You may also have the option to sign in from your Facebook or Google account. If you chose to sign in from your Facebook or Google account, you may authorize us to collect certain information from that social media account (e.g., name, username, email address, profile picture, gender, friend or contact list, or other information you make public on your social media profile). You may be able to control what information you provide us with in the preferences or settings of your social media account. We may use this information to personalize your experience on the websites.

● **Social Media:**

We may offer you the opportunity to engage with Vanbex or its content on or through third-party social networking websites, plug-ins and applications. When you engage with us on or through third-party social networking websites, plug-ins and applications, you may allow us to have access to certain information associated with your social media account (e.g., name, username, email address, profile picture) to deliver content or as part of the operation of the website, plug-in or application. Vanbex will never “post” content to your social media account without your immediate prior consent.

● **Payment Information:**

If you make a purchase on our website, a third-party payment processor collects your payment-card details (including payment card number, security code, expiration date,

cardholder name and billing address) for the purposes of processing your payment. Vanbex does not store your payment-card details on its servers or otherwise.

- **Cryptocurrency Transactions:**

When you engage in cryptocurrency transactions through our websites, we collect transaction information on the purchase or sale of digital currencies, or other transaction-based information that you generate or that is connected to your account.

- **Marketing Communications:**

You may select if you wish to receive email marketing communications with updates and other information regarding Vanbex by providing us with your name and email.

You can opt out of receiving marketing emails from us using the opt-out or “unsubscribe” instructions provided in the communication. Alternatively, you may contact our Privacy Officer at privacy@vanbex.com.

- **Employment:**

In connection with a job application or related inquiry, you may provide us with personal information including a resume, cover letter, or similar employment-related materials. This information will be used for the purpose of processing and responding to your application for current and future career opportunities.

- **Survey and Customer Research:**

From time to time, Vanbex may offer you the opportunity to participate in one of our surveys or other customer research. The information obtained through our surveys and customer research is used in an aggregated, non-personally identifiable form to help us understand our customers and to enhance our product and service offerings.

- **Contests and Promotions:**

When you enter a contest or participate in a promotion, Vanbex may collect your name, address, phone number, email address, and other information you provide. This information is used to administer your participation in the contest, sweepstakes or promotion.

- **Contact Us:**

When you contact us with a comment or question, we collect the information you provide such as your name and email address, along with additional information that we may need to help us promptly respond to your inquiry. We retain this information to assist you in the future and to improve our customer service and service offerings. We also use personal information to establish and manage our relationship with you and provide quality service.

Information We Collect Automatically

We and our third party service providers, including Google Analytics, collect, process, store and analyze information obtained from your browser when you visit our website, including IP address, device identifiers, browser characteristics, operating system details, language preferences, referring URLs, length of visits, and pages viewed. We also use “cookies” or other tools that track, measure and analyze the behaviors and usage patterns of visitors to the Vanbex website. We use this information to help us understand how visitors engage with the Vanbex website and to improve our visitors’ experience.

A cookie is a tiny element of data that the Vanbex website can send to your browser, which may then be stored on your computer or mobile device so we can recognize you when you return. We use cookies for analytics purposes as well as for certain features of the Vanbex website. You may set your web browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from the Vanbex website, you may not be able to take advantage of all of the features of our website.

You can obtain additional information on Google Analytics’ [collection and processing of data](#) and [data privacy and security](#), including how to [learn more about opting out](#) of Google Analytics’ data collection.

Your web browser may have settings that allow you to transmit a “Do Not Track” signal when you visit various websites or use online services. Like many websites, this website is not designed to respond to “Do Not Track” signals received from browsers. You can learn more about “Do Not Track” signals [here](#).

Sharing of Personal Information

Except as set forth in this Privacy Notice and as required or permitted by law, we do not sell or share your personal information with third parties without your consent.

Service Providers

Your personal information may be transferred (or otherwise made available) to our affiliates and other third parties who provide services on our behalf. We use third parties to host and manage our website, and to handle payment processing. Our service providers are given the information they need to perform their designated functions, and are not authorized to use or disclose personal information for their own marketing or other purposes.

Your personal information may be maintained and processed by us, our affiliates and other third party service providers in the US or other jurisdictions. In the event that personal information is transferred to the US or other foreign jurisdiction, it will be subject to the laws of that jurisdiction and may be disclosed to or accessed by the courts, law enforcement and governmental authorities in accordance with those laws.

Third Parties

We may use and share non-personal information we collect with our affiliates and third parties to develop and deliver targeted advertising on our websites or on the websites or applications of third parties, and to analyze and report on advertising you see. We may combine non-personal information we collect with additional non-personal information collected from other sources. We also may share aggregated, non-personal information, or personal information in hashed, non-human readable form, with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis, advertising, marketing, or other business purposes.

Legal and Compliance

We and our service providers may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to another organization for the purposes of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise required or permitted by applicable Canadian, US or other law or legal process. Your personal information may also be disclosed where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspect loss or harm to persons or property.

Sale of Business

Personal information may be provided to third parties in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Vanbex or as part of a corporate reorganization or stock sale or other change in corporate control, including for the purpose of determining whether to proceed or continue with such transaction or business relationship.

Safeguarding and Retention of Personal Information

We have implemented reasonable administrative, technical and physical measures in an effort to safeguard the personal information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. We restrict access to your personal information on a need-to-know basis to employees and authorized service providers who require access to fulfill their job requirements.

We have personal information retention processes designed to retain personal information for no longer than necessary for the purposes stated above or to otherwise meet legal requirements.

Access to Personal Information

You have the right to access, update and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. You may request access, updating and corrections of inaccuracies in other personal information we have in our custody or control by emailing or writing to us at the contact information set out below. We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records.

Additional Information

Third Party Websites

The site may contain links to other websites that are not owned or controlled by us. We have no control over, do not review and are not responsible for the privacy policies of or content displayed on such other websites. When you click on such a link, you will leave our service and go to another site. During this process, another entity may collect personal information from you.

Updates to the Privacy Notice

We may update this Privacy Notice to reflect changes to our privacy practices. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

Vanbex welcomes your comments and questions regarding this Privacy Notice and the use of your personal information. If you have questions or concerns please contact our Privacy Officer: privacy@vanbex.com