

PHLO SYSTEMS LIMITED
[FORMER SATOSHI SYSTEMS LIMITED]

1. INTRODUCTION

Phlo Systems Limited (“we” or “us” or “our”) respects the privacy of our users (“user” or “you”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website [www.phlo.io], including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the “Site”). Please read this privacy policy carefully. If you do not agree with the terms of this privacy policy, please do not access the site.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Site after the date such revised Privacy Policy is posted.

2. COLLECTION OF PERSONAL DATA

We may collect information about you in a variety of ways. The information we may collect includes personally identifiable information, such as your name, shipping address, email address, and telephone number, and demographic information, such as your age, gender, hometown, and interests, that you voluntarily give to us [when you register with the Site or computer software] or when you choose to participate in various activities related to the Site, such as online chat and message boards or when you expressly grant us access or permission. Device information, such as your mobile device ID, model, and manufacturer, and information about the location of your device, if you access the Site from a mobile device. You are under no obligation to provide us with personal information of any kind, however your refusal to do so may prevent you from using certain features of the Site.

3. USE OF YOUR INFORMATION

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you to:

- Administer promotions, and contests.
- Create and manage your account.
- Deliver targeted advertising, coupons, newsletters, and other information regarding promotions and the Site to you.
- Email you regarding your account or order.
- Enable user-to-user communications.
- Fulfil and manage purchases, orders, payments, and other transactions related to the Site.
- Generate a personal profile about you to make future visits to the Site more personalized.
- Increase the efficiency and operation of the Site.
- Monitor and analyse usage and trends to improve your experience with the Site.
- Notify you of updates to the Site.
- Offer new products, services, [mobile applications,] and/or recommendations to you.
- Perform other business activities as needed.
- Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
- Process payments and refunds.
- Request feedback and contact you about your use of the Site [and our mobile application].
- Resolve disputes and troubleshoot problems.
- Respond to product and customer service requests.
- Send you a newsletter.
- Solicit support for the Site.

4. DISCLOSURE OF YOUR INFORMATION

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

4.1 Security & Law Enforcement Purposes

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

4.2 Vendors, Consultants & Service Providers

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

4.3 Marketing Communications

With your consent, or with an opportunity for you to withdraw consent, we may share your information with third parties for marketing purposes, as permitted by law.

4.4 Interactions with Other Users

If you interact with other users of the Site, those users may see your name, profile photo, and descriptions of your activity, including sending invitations to other users, chatting with other users, liking posts, following blogs.

4.5 Online Postings

When you post comments, contributions or other content to the Site,, your posts may be viewed by all users and may be publicly distributed outside the Site in perpetuity.

4.6 Third-Party Advertisers

We may use third-party advertising companies to serve ads when you visit the Site .These companies may use information about your visits to the Site and other websites that are contained in web cookies in order to provide advertisements about goods and services of interest to you.

4.7 Affiliates

We may share your information with our affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

4.8 Business Partners

We may share your information with our business partners to offer you certain products, services or promotions.

4.9 Other Third Parties

We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

5. COOKIES

5.1 Cookies and Web Beacons

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site to help customize the Site and improve your experience. When you access the Site, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the Site. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or

by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

[For more information on how we use cookies, please refer to our Cookie Policy posted on the Site. By using this Site, you agree to be bound by our Cookie Policy.]

5.2 Website Analytics

We may also partner with selected third-party vendors [such as [Google Analytics, Heap Analytics, and others], to allow tracking technologies and remarketing services on the Site through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the Site, determine the popularity of certain content and better understand online activity.

6. SECURITY OF DATA

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information. For the avoidance of doubt, if any personal information is compromised despite our efforts to prevent the occurrence of the same, you shall not hold us liable for such breach of privacy protection under this privacy policy.

7. POLICY FOR CHILDREN

We do not knowingly solicit information from or market to children under the age of 13. However, if anyone below the age of 13 years subscribes to our application, then we would require a consent from such subscriber's parent or guardian permitting the collection, storage and sharing of personal information of such subscriber as per the terms of this Privacy Policy. If you are a parent or guardian and have become aware of any data that your child has provided and we have collected from children under age 13 years, please contact us using the contact information provided below and we will take appropriate action for deletion of such information.

Email: info@phlo.io

8. EMAILS AND COMMUNICATIONS

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the Site.
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below

9. EXERCISE YOUR RIGHTS

General Data Protection Regulation provides several privacy rights to its residents. You can access your rights by mailing us at info@phlo.io

The rights you may enjoy include:

• **Right to Access**

You have a right to access and receive a copy of your personal data. We will provide this information free of charge unless your request is unfounded or excessive or repetitive, in which case we are entitled to charge a reasonable fee. To access your personal data stored with us, you can send us a Data Subject Access Request through email. We will provide the requested information at the earliest. To ensure we are providing the information to the right person, we may ask you for some particulars to prove your identity, when and so required.

• **Right to Rectification**

If you believe that your personal information with us is inaccurate or incomplete, you can request to rectify the said data. We will process the request within one month of receiving it.

• **Right to Erasure/ Right to be forgotten**

You can affirm your right to erasure by requesting Phlo to erase your personal information with us. You can access this right when:

- a) the collection and storage find legal basis in consent and you withdraw it.
- b) we no longer need the data for the purpose we collected for.
- c) where you object to the processing and we do not have any overriding legitimate interests to continue processing of such data.

Under certain circumstances we will not be able to comply with your request. If any of those circumstances apply, we will inform you at the earliest.

• **Right to Restriction of processing**

If you believe that the personal data we hold about you is inaccurate or incomplete or the processing is unlawful or Phlo does not require your data for the original purpose or if the verification of overriding grounds is pending in the context of an erasure request, you can ask us to restrict the use of your personal data. This right will block the use of your personal data by the company for a particular time period.

• **Right to Withdraw Consent**

If you do not want to receive marketing messages, updates or non-transactional communications by Phlo, you may opt-out or withdraw your consent at any time by unsubscribing to our e-mails or by sending a request to the abovementioned e-mail address. The withdrawal of your consent will not dispute the lawfulness of processing done in the past on the basis of consent.

Phlo is committed to ensure that the information we collect and use is appropriate for the above mentioned purposes and does not intend to invade your privacy.

• **Your Right to Data Portability**

You have the right to ask that we transfer the Personal Information you gave us to another organisation, or to you, in certain circumstances.

10. CONTACT US

If you wish to make a complaint about how your personal data is processed by us, email us at info@phlo.io. We at Phlo are committed to strict adherence to this Privacy Statement and secure your privacy. For us, you all are equally valuable and your trust is our asset. If you are unhappy about how a complaint has been handled by us, please contact us.

Email address: info@phlo.io

Telephone number: +44-7957165001 **Postal address:** Office 617, 83 Victoria Street Business Centre, London, SW1H 0HW, United Kingdom

Last Updated on- 09/06/2023