

PRIVACY POLICY

Last updated: February 5, 2020

INTRODUCTION

We, at Magic Lamp LTD ("**us**", "**we**" or "**Company**"), respect the privacy of our users (each, "**you**" or "**User**") and are committed to protecting the privacy of Users who access, visit, use or engage with our website (wby.io, my.wby.io including any applicable subdomains), our mobile application and any other online service we provide (collectively: the "**Services**").

Our privacy policy ("**Privacy Policy**") will help you understand what types of information we collect through the Services, how we use it, and what choices you have. We encourage you to read this Privacy Policy carefully and use it to make informed decisions. By using our Services, you agree to the terms of this Privacy Policy and your continued use of the Services constitutes your ongoing agreement to it.

WHAT INFORMATION DO WE COLLECT?

We may collect the following types of information from or about you:

Personal Information

Personal Information is individually identifiable information, namely information that identifies an individual or which may, with reasonable effort, identify an individual. We gather the following types of Personal Information:

- **Registration details:**
 - When you sign-up and register to the Services, you will be asked to provide us certain details about yourself, such as your full name, email address, phone number and physical address.
 - in certain cases, our Services require us to gather additional information for our compliance with regulatory Know Your Customer ("**KYC**") requirements, such as your bank statement, passport or ID information (Passport/ID number, date of issuance, full name, issuing country, expiry date, etc.), driving license information (including driving license number, date of issuance, full name, issuance country, date of birth) images of identification documents, images of proof-of-residence (utility bills, bank/credit card statements, government-issued letters), and images of yourself (selfie photos).
- **Payment transaction information:** We will collect your transaction information, such as 4 last digits of your credit card, card owner information and crypto wallet information.
- **Voluntary information:** We collect information which you provide us voluntarily. For example, when you respond to communications from us, or when you share additional information through your use of the Services.

- **Communication information:** We may collect information from your communication with our support team via email, WhatsApp, calls, Skype or other means of communication.
- **Device information:** We also collect specific types of connection details and information with regard to your device, software or hardware that may identify you, such as: online identifiers, device unique identifiers (e.g. UDID, MAC address), IP address and geolocation.

Non-personal Information

Non-personal Information is non-identifiable information that, when taken alone, cannot be used to identify you. As such, we are not aware of the identity of the user from which the Non-personal Information was collected.

We may anonymize or de-identify the information collected by the Services or via other means so that the information cannot, on its own, personally identify you. Our use and disclosure of such aggregated or de-identified information is not subject to any restrictions under this Privacy Policy, and we may disclose it to others without limitation and for any purpose.

Analytics Data

Our servers automatically record certain information regarding the use of our Services. Such data may include information such as the website that a User was visiting before accessing our Services and other statistics related to our Services. We also perform statistical analysis on all of the data and metadata which is collected through our Services.

We use this information to administer the Services and analyze this information to improve and enhance the Services by expanding their features and functionality. Such data is also used for troubleshooting errors and bugs as well as for research and analytics purposes about your use of the Services.

For the avoidance of doubt, if we combine Personal Information with Non-personal Information (e.g. analytics data), the combined information will be treated as Personal Information as long as it remains combined.

HOW DO WE USE THE INFORMATION THAT WE COLLECT?

In addition to the purposes listed herein, the information we collect, which may include your Personal Information, is used for the following purposes:

- To set up your account and to provide you with the Services;
- To identify and authenticate your access to our Services;
- To authenticate your identity for the purpose of compliance with regulatory requirements, such as with KYC requirements;
- To support and troubleshoot our Services and to respond to queries;

- To improve and customize our Services to Users' needs and interests;
- To communicate with you and to keep you informed of our latest updates;
- To serve you advertisements that are relevant to you and your interests, regarding our Services (see more under "Advertisement");
- To market our Services (see more under "Marketing");
- To investigate and resolve disputes in connection with your use of the Services;
- To detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the Services; and
- To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request.

WITH WHOM DO WE SHARE THE INFORMATION THAT WE COLLECT?

We do not rent or sell any Personal Information. We may disclose Personal Information to other trusted third party service providers or business partners for the following purposes:

- Assisting us with our business operations (e.g. processing and analyzing Personal Information);
- Storage (e.g. cloud computing service providers);
- Research and analytics that will enable us to improve the Services;
- Communicating promotional and informational materials (see below under "Marketing");
- Escrow services (only if you choose to, and in such case your KYC data will be shared with the escrow service);
- If we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies (including our agreements), including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or (vi) for the purpose of collaborating with law enforcement agencies or in case we find it necessary in order to enforce intellectual property or other legal rights.

In addition, we may transfer or disclose Personal Information to our subsidiaries and other affiliated companies.

GROUNDS FOR DATA COLLECTION

Subject to your consent and in order to administer our Services we will collect and process your Personal Information. We also rely on other lawful grounds for processing your Personal Information, namely: the performance of our contractual obligations towards you, our legitimate

interests in provision of our Services, and for compliance with legal and regulatory obligations to which we are subject.

When you use our Services, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

INTERNATIONAL TRANSFER

Since we operate globally, it may be necessary to transfer data, including Personal Information, to countries outside the European Economic Area ("EEA"). In these instances, we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection.

YOUR PRIVACY RIGHTS

You may request to:

- Receive confirmation as to whether or not Personal Information concerning you is being processed, and access your stored personal information, together with certain supplementary information.
- Receive Personal Information you directly volunteer to us in a structured, commonly used and machine-readable format.
- Request rectification of your Personal Information that is in our control.
- Request erasure of your Personal Information.
- Object to the processing of Personal Information by us.
- Request to restrict processing of your Personal Information by us.

However, please note that: (a) Users residing in non-EU jurisdictions may be afforded additional rights, in case this applies to you please contact us by using the details provided below for more information or requests; (b) these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

If you wish to raise a complaint on how we have handled your Personal Information, you can contact us at dpo@wby.io

If you are not satisfied with our response or believe we are collecting or processing your Personal Information not in accordance with the laws, you can file a complaint to the applicable data protection authority.

FOR HOW LONG DO WE RETAIN THE INFORMATION THAT WE COLLECT?

We retain the information that we collect from Users for as long as needed to provide our Services and to comply with our legal obligations, resolve disputes and enforce our agreements (unless we are instructed otherwise). Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the

requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing your Personal Information, account opening documents, communications and anything else as required by applicable laws and regulations.

COOKIES

When you visit or access our Services we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies (collectively, "**Tracking Technologies**"). Those allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our Services, improve our Services' performance, perform analytics and customize your experience. In addition, we may merge data we have with data collected through these tracking technologies and data we may obtain from other sources and, as a result, such data may become Personal Information. To learn more about how we use Tracking Technologies, please read our [Cookie Policy](#).

HOW DO WE SAFEGUARD YOUR INFORMATION?

We take great care in implementing and maintaining the security of the Services and your Personal Information. We employ industry standard procedures to ensure the confidentiality, integrity, and availability of our Users' data, safety of your Personal Information, and prevent unauthorized use of any such information.

However, we cannot guarantee that hackers or unauthorized personnel will not gain access to information despite our efforts. You should note that by using our Services, your information will be transferred through third party infrastructures which are not under our control. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

If you feel that your privacy was treated not in accordance with this Privacy Policy, please contact us directly at dpo@wby.io

ADVERTISEMENTS

Through our Services, we may provide advertisements that are tailored to you, for example ads that are based on your recent browsing behavior across different websites, browsers, or devices.

Furthermore, in order to target advertisements to you for products and services in which you might be interested at, we, as well as certain third parties, may use Tracking Technologies to display advertisements based on your visits to Services, to target advertisements to you for products and services in which you might be interested, and to measure the effectiveness of such

ads. These Tracking Technologies are governed by each third party's specific privacy policy, not this one.

You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative (“NAI”) and the Digital Advertising Alliance (“DAA”). For more information about this practice by NAI and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI and DAA members, please visit their respective websites: <http://optout.networkadvertising.org/#/> and <http://optout.aboutads.info/#/>.

MARKETING

We may use your Personal Information, such as your full name, email address, etc. ourselves or by using our third-party partners for the purpose of providing you with promotional materials, concerning our Services.

Out of respect to your right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us. In addition, at any time, you may request to unsubscribe and discontinue receiving marketing offers by clicking on the word “unsubscribe” which contains the unsubscribe link, at the end of each received marketing email.

Please note that even if you unsubscribe from our marketing mailing list, we may continue to send you service-related updates and notifications.

CORPORATE TRANSACTION

We may share information, including Personal Information, in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale of an asset or transfer in the operation thereof) of the Company. In the event of the above, the acquiring company or transferee will respect the rights and obligations as described in this Privacy Policy.

MINORS

The Services are not designated to individuals under the age of 16. If you are under 16 you should not use the Services nor provide any Personal Information to us.

We reserve the right to access and verify any Personal Information which is collected from you by us. In the event that we become aware that an individual under the age of 16 shared any information, we will discard such information. If you have any reason to believe that a minor shared any information with us, please contact us at dpo@wby.io

UPDATES OR AMENDMENTS TO THE PRIVACY POLICY

We may revise this Privacy Policy from time to time, in our sole discretion, and the most current version will always be posted on our website (as reflected in the “Last Revised” heading). We encourage you to review this Privacy Policy regularly for any changes.

Your continued use of the Services, following the posting of such amendments on our website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

CONTACT US

If you have any general questions regarding the Services or the information that we collect about you and how we use it, please contact us at dpo@wby.io

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