

Privacy Notice

STROOM NETWORK

Last updated: 07.03.2024

This notice describes how we collect and process users' data by Stroom Network through <https://stroom.network/#> website (referred to as the "**Platform**"). The terms "we", "us", "our" refer to **Current Limited**, a Cayman Islands exempted company.

We are committed to safeguarding the privacy of our users. We will not misuse your data.

From the data protection perspective, we are a data controller for the information collected through the Platform. You can contact us at:

Current Limited

Registered address: 190 Elgin Avenue, George Town, Grand Cayman KY1-9008, Cayman Islands

Contact email address: info@stroom.network

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Information we collect from you

Usage data

Usage Data is collected automatically when using the Platform and participating in the Testnet (as defined in Stroom Terms and Conditions).

Usage Data may include information such as your device's Internet Protocol address (e.g. IP address), type of device you use, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you participate in the Testnet we may collect certain information about your use of Testnet including but not limited to your BTC wallet address, MetaMask wallet address, deposit amount, deposit count, redeem amount, redeem count, and Blockchain transaction records.

We may also collect information that your browser sends whenever you visit our Platform or when you access it through a mobile device.

We also collect information about the traffic on our Platform for our analytical purposes. To learn more, please refer to "**Analytics**" section of this Notice.

Support Requests, Feedback and Other Inquiries

You may leave a request for our support, leave us feedback on your participation in the Testnet or ask relevant questions by email. We use this information to provide you with the help you might need, assist with your request and to fix and improve the Platform.

We will keep this information for two (2) years after our last communication related to it.

Cookies

A cookie is a small text file that is downloaded onto your 'terminal equipment' (e.g. a computer or smartphone) when you access our Platform. It allows us to recognise your device and store some information about your preferences or past actions.

Cookies are downloaded by your internet browser the first time you visit the Platform. The next time you visit the Platform from the same device, the cookie and the information stored in it is either sent back to the site that generated it (***first-party cookie***) or to a different website to which it belongs (***third-party cookie***).

Why do we use Cookies?

- **Strictly Necessary Cookies**. To enable the work of the Platform and provide users with a usable interface (on the grounds of necessity to provide you with our services). The Platform cannot function properly without these cookies.
- **Analytical Cookies**. To analyze how you interact with our Platform and conduct our marketing research. These cookies allow us to understand how visitors interact with our Platform and to improve the performance of our Platform.

Legal Basis for Processing

Performance of Contract (Terms of Use)

We process your usage data to provide you access to our Platform under Stroom Terms and Conditions. Without this information, we will be unable to provide you with access to our Platform.

Also, we use information provided by you as feedback, support requests or inquiries to properly provide you with our Services under the Terms of Use.

Legitimate Interests

For improving the quality of the Platform and analysing Platform traffic, as well as debugging its work, we process your usage data and your feedback in our legitimate interests.

Third-party Access to Information

Third-party service providers

The following categories of third-party providers are used to enable the work of our Platform:

- Providers of Platform analytics and user session recordings (such as Google Analytics).

Analytics

We use analytic services to collect details of the Platform use, including, but not limited to traffic data, location data, length visit, other communication data, IP address, device information (such as hardware model, operating system version, unique device identifiers), BTC wallet address, MetaMask wallet address, deposit amount, deposit count, redeem amount, redeem count. In aggregated form, this information allows us to analyse the popularity and usability of the Platform.

Other Disclosures

In addition to the disclosures for the purposes identified before, we may disclose information about you:

- if we are required to do so by law, in connection with any legal proceedings, or to establish, exercise or defend our legal rights; and
- in case we sell, license, or otherwise assign our company, corporate rights, Platform, or its separate parts or features to third parties.

Except as provided in this privacy notice, we will not sell, share, or rent your information to third parties.

Your rights

To maintain control of your personal data, you may exercise certain rights regarding your information. In particular, you have the right to:

- **Object to the processing of your information.** If we process your information in our legitimate interests, e.g., for our marketing purposes, you can object against it. We will consider your request and if there are no compelling interests to refuse it, stop the processing for such purposes;
- **Access your information.** You have the right to know if we process your information; obtain disclosure regarding certain aspects of the processing; obtain a copy of the information undergoing processing.
- **Verify your information and seek its rectification.** If you find that we process inaccurate or out-of-date information, you can verify the accuracy of your information and/or ask for it to be updated or corrected;
- **Restrict the processing of your information.** When you contest the accuracy of your information, believe we process it unlawfully or want to object against the processing, you have the right to temporarily stop the processing of your information to check if the processing was consistent. In this case, we will not process the information for any purpose other than storing it until the circumstances of restriction cease to exist;

- **Ask us to delete/destroy/otherwise remove your information.** If we are not obliged to keep the data for legal compliance, we will remove your information upon your request; and
- **Ask us to transfer your information to another organisation** if we process the information based on your consent or on the necessity to perform the contract.

You can complete the request to exercise your right by contacting us at info@stroom.network.

If you believe that our use of personal information violates your rights, you can lodge a complaint with the competent data protection authority.

Security of Information

We take necessary and sufficient measures to protect your information from unauthorised or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

Internally, immediate access to the data is only allowed to our authorised employees involved in maintaining our Platform and conducting other processing activities. Those employees include our backend software developer, operational and marketing team. Such employees keep strict confidentiality and prevent unauthorised third-party access to 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 unauthorised parties.

Third-party services

Our Platform may contain links to third-party services and platforms, including those posted by our partners and affiliate companies. Although we choose our partners thoroughly and diligently, we cannot be responsible for the content, terms and conditions, or privacy policies of third-party services.

We encourage users to be aware when they leave our Platform and to read the privacy statements of the services that collect personally identifiable information.

Third-party websites may contain their own cookies. We are not responsible for their usage of cookies.

Changes to This Notice

We may update this privacy notice from time to time by posting a new version on our website. We advise you to check this page occasionally to ensure you are happy with any changes. However, we will endeavour to provide you with an announcement about any significant changes.