

BLOCKBOX LLC

Brand "FOLKS FINANCE"

Privacy Policy – Protecting Your Data

Our Principles

- The protection of your privacy is very important to us.
- We treat your data responsibly and only for specified purposes.
- We are aware of the sensitivity of the data you have entrusted to us.
- We do not process any personal data without a legal basis.
- We will never pass on your data to third parties without your explicit consent.
- We use several well-established measures (such as encryption) to prevent any misuse of your data.
- We follow the principle of data minimization.

General

BLOCKBOX LLC (hereinafter: 'BLOCKBOX') under the brand name Folks Finance is a legal entity incorporated pursuant to the Company Law of Georgia by the National Agency of Public Registry of Georgia.

BLOCKBOX is aware that the personal data you have entrusted to us is sensitive. We ensure that the personal data that customers and prospective customers provide when using our services is always treated confidentially.

Personal data is any information that personally identifies you (or can be directly linked to you) such as your name, telephone number, address, and other information required for the provision of our services. This does not include information which cannot be directly linked to your person.

We protect the personal data of customers and prospective customers through the use of high security standards as well as standard operating procedures, which have been created specifically to prevent any misuse of this information.

Customer Information about data processing in accordance with the EU General Data

Protection Regulation (GDPR)

The protection of personal data is important to us at BLOCKBOX and we aim to comply with the data protection regulations in order to achieve sufficient protection and security of the customer data. With this document we wish to inform you about the processing of your personal data by BLOCKBOX and the rights regarding data protection, to which you are entitled.

1. Who is responsible for data processing and who can you contact?

Responsible for the data processing is:

BLOCKBOX – Folks Finance

Address: Avtomshenebeli St. N88, Kutaisi, Georgia (Free Industrial Zone)

Email address: contact@folksmobile.app

Our corporate data protection officer can be reached at:

Data protection officer: Benedetto Biondi

Address: Avtomshenebeli St. N88, Kutaisi, Georgia (Free Industrial Zone)

Email address: contact@folksmobile.app

2. Which data is processed by us and what are the sources for this data?

We process personal data that we receive from you in the context of the customer relationship. The customer relationship begins with the use of our services and includes the permanent termination of such use. We also process data that we obtained permissibly from publicly available sources (e.g. commercial register).

Personal data from you that we process includes for example:

first and last name, address, date and place of birth, nationality, occupational information, phone numbers, email address, bank account information, information on personal income, information on personal wealth, marital status, tax number, data from identification documents, login data, customer number, etc.

3. For what purposes and on what legal basis do we process the data?

a) To fulfil contractual obligations (Art. 6 (1) lit b) GDPR):

We process personal data (Art 4 No. 2 GDPR) in order to provide our services under the platform contract and other relevant required activities. Precontractual information that you provide as part of the registration process is also included.

b) To meet legal obligations (Art. 6 (1) lit c) GDPR):

We may process personal data for the purpose of fulfilling various legal obligations, e.g. due to taxation law etc.

c) Within the framework of your consent (Art. 6 (1) lit a) GDPR):

In case you give us consent for the processing of your personal data for specific purposes, we process data in accordance with the purposes and to the extent defined in the declaration of consent. You have the possibility to revoke your consent at any time with effect for the future.

d) To protect legitimate interests (Art. 6 (1) lit f) GDPR):

It is possible as result of a balancing of interests that in favor of BLOCKBOX or third parties or a third party process data beyond the actual fulfilment of the contract to protect legitimate interests of BLOCKBOX or third parties. Such processing is:

e) Testing and optimization of requirements analysis and direct customer approach;

f) Measures to manage the business, to improve services and to recover customers;

g) Advertising or market and opinion research, unless you have not objected to this kind of usage of your personal data according to Art. 21 GDPR.

4. Who receives my personal data?

a) Within BLOCKBOX those departments and employees process your personal data, which need the data to fulfill the contractual obligations, legal obligations or legitimate interests.

b) In addition, data processors (e.g. external IT service providers) and distribution partners contracted by us process your personal data if they need the data to perform their respective services. All data processors and distribution partners have a contractual obligation to treat your data as confidential and to process the data only within the framework of the provision of their services to us.

c) Based on the fulfillment of legal obligations BLOCKBOX may be obliged under certain circumstances to forward data to public bodies and institutions.

d) Other persons may receive your data if you have given your consent for the transmission of data to such persons.

5. Does BLOCKBOX transmit my data to a third country or an international organization?

In principle, your personal data will not be transmitted to a third country or international organization. In any case such transmission only occurs as part of a data processing agreement, an express consent by you or based on a legal obligation and taking into account legal restrictions.

6. How long will my data be stored?

- BLOCKBOX stores your personal data no longer than absolutely necessary. In order to fulfill the contract, we store the data for the duration of the entire customer relationship.
- Based on legal retention and documentation requirements BLOCKBOX can store data beyond the customer relationship.

7. Which privacy rights do I have?

a) Right of information (Art. 15 GDPR):

Your right of information includes that you can request from BLOCKBOX a confirmation whether we process personal data of you. Is this the case, you have the right to get information about this data and further information about how we process the data.

b) Right to rectification (Art. 16 GDPR):

If your information is not correct (anymore), you have the right to claim for rectification of incorrect personal data by us.

c) Right to erasure (Art. 17 GDPR):

You have the right to call for an immediate erasure of your data by us if any of the following applies:

- The keeping of the personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- You have revoked your consent and there is no other legal basis for processing.
- Your personal data has been processed without good reason.
- Your personal data must be deleted to meet legal requirements.

d) Right to restrict processing (Art. 18 GDPR):

The right to restrict processing includes that you can require limited data processing if any of the following applies:

- The accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data.
- The processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead.
- BLOCKBOX no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims;
- You have objected to the processing and the verification whether the legitimate grounds of the controller override those of the data subject is still pending.

e) Right to object (Art. 21 GDPR):

If data processing takes place on the basis of a legitimate interest or of the public interest,

you have the right to object to this data processing. Detailed information on your right of objection can be found at the end of this section.

f) Right to data portability (Art. 20 GDPR):

You have the right to receive your personal data provided to us in a portable format and ask us to transmit such data to another controller without hindrance from BLOCKBOX.

g) Right to complain:

In case you believe that we process your data against national or European data protection law, we kindly ask you to contact us, to find a solution together. In addition, there is a right to complain at the respective data protection supervisory authority.

h) Revocation of consent for data processing:

A consent to the processing of personal data can be revoked at any time without any form requirements. This also applies with regard to the withdrawal of declarations of consent issued to us prior to the application of the GDPR, i.e. before 25 May 2018. We would like to point out that any revocation only applies for the future.

8. Am I required to provide personal data?

a) In the context of the customer relationship, you must provide the personal data necessary for the initiation and fulfillment of the customer relationship. Also you must provide us with personal data necessary for the fulfillment of legal obligations.

b) Should you disagree with the provision of these required personal data, we are not in a position to conclude or execute a contract with you.

9. Does BLOCKBOX use automated decision making (including profiling)?

BLOCKBOX does not use automated decision making in the sense of Art. 22 GDPR as part of the business relationship. BLOCKBOX processes your data partially automated to evaluate certain personal aspects (*profiling*) and to be able to provide the best possible service to you. In order to inform you about products in a targeted manner, we use evaluation tools that enable us to communicate and advertise on demand.

Information about our website

External Links

Links to external webpages are provided on our website for informational purposes only. If it is not obviously recognizable, we will explicitly point out when such links are to external websites. BLOCKBOX is not responsible for the contents and the design of third-party websites and cannot attest to their correctness, factuality or legality. Our privacy policy does not apply for those websites.

Statistics and tracking services

Below you will find an explanation of the statistics and tracking services that may be used by BLOCKBOX. All these services use so-called "cookies", text files which are stored on your computer and which allow an analysis of the use of the website by you.

Bing Universal Event Tracking

The Web site uses Bing Universal event tracking (a service from Microsoft Inc., one Microsoft Way, Redmond, WA 98052-6399, USA). This service allows us to track the activities of the users of our website, if they have been forwarded to our website via a display of Bing ads. In this case, a cookie is stored on your computer. On our website is a so-called Bing Universal event tracking tag is set. This is a code that, in conjunction with the cookie stored on your computer, stores anonymized data (such as the event type and event category) about your use of the site. This data is transferred to a Microsoft Inc. server in the United States and is stored there for a maximum of 180 days. By using our website, you consent to the processing of the data collected about you by Microsoft in the manner and for the purpose described above. You may oppose participation in the tracking at any time with effect for the future under this [link](#).

Crazy Egg

This website uses the web analytics service Crazy Egg of Crazy Egg Inc. ('Crazy Egg') to collect statistical data about the usage of our website. With the help of Crazy Egg's technology, visitor information is collected and sent to Crazy Egg's server. With the help of cookies, the technology enables us to determine, analyse and visualize the activities of users when visiting our website. However, in this process, no personal data, such as names, addresses or telephone numbers, is saved by Crazy Egg, and the information collected is not forwarded to third parties. By using this website you agree to the processing of data about you by Crazy Egg in the manner described above and for the above-stated purposes. You can opt out of the collection and storage of data by Crazy Egg at any time by adjusting your browser settings. For guidance on how to do this, click on this [link](#).

Facebook Remarketing

This website uses the so-called Facebook pixel of the social network Facebook (Facebook Inc., 1601 South California Avenue, Palo Alto, CA 94304, USA). When you visit our website, the Facebook pixel is used to establish a direct connection between your browser and the Facebook server. This will give Facebook the information that you have visited this page with your IP address. This allows Facebook to associate the visit to our pages with your user account. The information obtained in this way can be used for the display of Facebook ads or for tracking functions. For more information, see the [Facebook privacy statement](#). By using our website, you consent to the processing of the data collected about you by Facebook in the manner described above and for the aforementioned purpose. If you do not wish to collect data, you can disable it [here](#).

Google Analytics

This website uses Google Analytics. This is a web analytics service which is provided by Google, Inc. ("Google"). Google Analytics uses "cookies", text files placed on your computer, to help analyze how customers use this site. Information generated by the cookie about your use of the website (including IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information to evaluate your use of the website, compiling reports on website activity for website operators, and providing other services relating to website activity and internet usage. Google may transfer this information to third parties where required to do so by law, or where third parties process the information on Google's behalf. Google will not associate your IP address with any other data that is held by Google. You may at any time refuse the use of cookies by selecting the appropriate settings in your browser. Please note that if you do this you may not be able to use the full functionality of the website. By using this website, you consent to the processing of your personal data by Google in the manner and for the purposes set out above. You can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available [here](#). You can also opt out from Google Analytics tracking on this website by clicking on this [link](#).

Google AdWords

Conversion tracking from AdWords is an analysis service from Google Inc. that links the data from the Google AdWords Network to the activity that is taking place on our website in order to generate conversion statistics. Cookies and usage data are collected. By using our website, you agree to the processing of the data collected about you in the manner and for the purpose described above. If you do not wish to participate in the tracking, please disable the saving of cookies in the appropriate setting of your browser.

Google remarketing

AdWords Remarketing is a remarketing and behavioural targeting service from Google Inc. that links the activity that takes place on our website to the AdWords Network and the DoubleClick cookie to display interest-based recommendations. Cookies and usage data are collected. By using our website, you agree to the processing of the data collected about you in the manner and for the purpose described above. If you do not wish to receive interest-based recommendations, please disable the saving of cookies in the appropriate setting of your browser.

Hotjar

In order to improve the user experience on our website, we use the software Hotjar (<http://www.hotjar.com>, 3 Lyons range, 20 Bisazza Street, Sliema SLM 1640, Malta, Europe). By using Hotjar we can measure and evaluate the user behaviour (mouse movements, clicks, scrolling etc.) on our internet pages. In order to collect data, Hotjar uses cookies on users's devices and can store data from users such as browser information, operating system, time on the site, etc. More information about data processing by Hotjar can be found [here](#).

Intercom

For a direct interaction with the visitors of our internet site via chat we use a communication tool of the provider Intercom R&D, Stephens Court, 18-21 Saint Stephens Green, Dublin 2, Ireland. When using the chat function on our internet site, no automatic recording or transmission of personal data of the visitor to intercom is carried out. If the visitor leaves his e-mail address, it will be stored by intercom and may be used in accordance with the privacy policy of Intercom. The privacy policy of intercom can be viewed [here](#).

LinkedIn website retargeting

LinkedIn website retargeting is a remarketing and behavioural targeting service from LinkedIn Corporation that connects the activity on our website to the LinkedIn network to display interest-based recommendations. To do this, this website uses the so-called LinkedIn insight tag. This tag deposits a cookie in the web browser of visitors to our website. We also receive aggregated and anonymous reports from LinkedIn about ad activity and information about how you interact with our site. The LinkedIn insight tag allows you to collect meta data such as IP address, timestamp, and events (such as visited page). All data is encrypted. The LinkedIn browser cookie is stored in your browser until the cookie is deleted or expires (the cookie has a six-month validity period from the time the user's browser last loaded the Insight tag). By using our website, you agree to the processing of the data collected about you in the manner and for the purpose described above. You can opt out of the analysis of your usage behaviour through LinkedIn and the display of interest-based recommendations. To do this, click the "Decline on LinkedIn" checkbox (for LinkedIn members) or "Decline" (for other users) at this [link](#).

Snowplow

Our website uses the analysis service Snowplow of Snowplow Analytics Ltd., London EC2A 4RQ, UK). Snowplow collects information about the use of our website by using a tracking pixel and cookies. Data collection and processing is carried out at any time without reference to persons. In particular, no full IP addresses are stored. By using our website, you agree to the processing of the data collected about you by Snowplow in the manner and for the purpose described above.

Intermediary Partners (affiliates, publisher)

When accessing our website through certain intermediary partners with whom we cooperate, cookies are set by these intermediary partners. The cookies remain stored beyond your current visit to our website. However, no personal data are collected, but only anonymous identification numbers for the purpose of assigning the reference to the respective intermediating partner.

How to prevent cookies

If you do not wish collecting data from cookies, please disable the storage of cookies in the appropriate setting of your browser. You can also delete existing cookies there. However, we would point out that in this case you may not be able to use all the functions of this website to its full extent.

Our Security Technology

The pages on which we collect personal data are encrypted with 128 bit and are certified by institutions that are approved for international accredited encryption certification.