

# Sila Inc. Privacy Policy

## Overview

Sila Inc., and its affiliates (collectively “ Sila”, “ we”, “us”, or “ our”) operate internationally. Sila is committed to ensuring that when we collect and use information about visitors to our websites (as described below) we do so in accordance with applicable data privacy laws. This Privacy Policy explains how we may use information that we obtain about you through your use of our websites and other sources (collectively, our “ Site”), including but not limited to: [www.silamoney.com](http://www.silamoney.com), [sillamoney.com](http://sillamoney.com), [silamoney.org](http://silamoney.org), [silacoin.org](http://silacoin.org), [sila.money](http://sila.money), [sila.cash](http://sila.cash), and [silamoney.net](http://silamoney.net).

The Privacy Policy: (i) provides you information as to how Sila collects and processes your Personal Data, through the use of the Site and any data you may provide through the Site, and (ii) outlines Sila’s duties of Transparency under the “General Data Protection Regulation ” or “GDPR”.

For the purpose of applicable data protection legislation, the data controller of your Personal Data is Sila Inc.

You can contact us by emailing [legal@silamoney.com](mailto:legal@silamoney.com)

## Marketing Communications Preferences

You may request us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, by opting out on our website, or by contacting us at any time at [legal@silamoney.com](mailto:legal@silamoney.com)

When you use our Site or when we interact with you, the Personal Data we collect, may include:

- **Contact Data**, such as your name, job title, business address, telephone number, mobile phone number, fax number, email address, and social media profiles;
- **Professional Data**, such as job titles, previous roles, and professional experience and qualifications;
- **Profile and Usage Data**, including passwords to our Site or password protected platforms or services, your preferences in receiving marketing information from us, your communication preferences and information about how you use our Site including the services you viewed. To learn more about our use of cookies or similar technology please check our Cookies policy below.

- **Technical Data**, including, without limitation, Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Site or use our services;
- **Physical Access Data** relating to details of your visits to our premises; and
- **Sensitive Personal Data**. In connection with the registration for and provision of access to an event or seminar, we may ask for information about your health for the purpose of identifying and being considerate of any disabilities or special dietary requirements you may have. Any use of such information is based on your consent and limited to providing you access to that event or seminar.

When you enter our recruitment process, we may additionally collect the following Personal Data:

- **Resume Data**, comprised of information submitted by you on your resume, cover letter, or other application materials;
- **Government Data**, including background checks and other information to allow us to establish your right to work;
- **Social Data**. If you connect to us from a social network, such as LinkedIn or Facebook, we will collect Personal Data from the social network in accordance with your privacy settings on that social network. The connected social network may provide us with information such as your name, profile picture, network, gender, username, user ID, age or age range, language, country, friends list, follower list, and any other information you have agreed it can share or that the social network provides to us; and
- **Data from Third Parties**, including, without limitation, information from your references to whom you direct us or from third parties who recommend or suggest that we contact you.

We also collect, use and share “**Aggregated Data**” such as statistical data for any purpose. Aggregated Data may be derived from your Personal Data, but once in aggregated form it will not constitute considered Personal Data for the purposes of the GDPR as this data does not directly or indirectly reveal your identity.

### **Sensitive Personal Data**

In connection with the registration for and provision of access to an event or seminar, we may ask for information about your health for the purpose of identifying and being considerate of any disabilities or special dietary requirements you may have. Any use of such information is based on your consent and limited to providing you access to that event or seminar.

Except for the foregoing, we ask that you not send us, and you do not disclose to us, any Sensitive Personal Data (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through our Site or otherwise to us, unless specifically requested for a valid legal purpose.

## How We Use Your Personal Data

We will use the Personal Data listed above if and to the extent necessary to achieve the following the purposes:

- To provide our products and/or services in accordance with our contractual relationship with your organization;
- To manage and administer your organization's relationship with us, including billing and collection, marketing, support services, or other steps linked to the performance of our business relationship;
- To comply with our legal and regulatory obligations, such as for anti-money laundering, financial and credit check, audit requirements, fraud and crime prevention and detection, and record keeping. This may include automated checks of Personal Data you or your organization provides about your identity against relevant databases and contacting you to confirm your identity, or making records of our communications with you for compliance purposes;
- To analyze and improve our services and promote our business such as sending you publications and invites;
- Protecting the security of and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities;
- For insurance purposes;
- Where applicable, and only as permitted by law with respect to the specific category of Personal Data, to assess your application to join us or your or your organization's ability to collaborate with us on a project;
- To comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;
- To comply with court orders and/or to exercise and/or defend our legal rights;
- To assist or enhance your experience at an event, for example, details of your dietary requirements;

- To personalize and foster the quality of our communications and interaction with you;
- To market our products and services;
- To facilitate due diligence with third parties in connection with a transaction, such as a merger, a financing, or acquisition of all or a portion of our business or our acquisition of another business;
- For any other purposes related and/or ancillary to any of the above or any other purposes for which your Personal Data was provided to us; and
- For our recruitment.

### Legal Basis for Our Use of Your Personal Data

We may process your Personal Data in connection with any of the purposes set out above on one or more of the following legal grounds:

- Because it is necessary for us to do so to perform our contract with you or your organization;
- To comply with our legal obligations as well as to keep records of our compliance processes or tax records;
- Because our legitimate interests, or those of a third-party recipient of your Personal Data, make the processing necessary, provided that those interests are not overridden by your interests or fundamental rights and freedoms; or
- Because you have expressly given us your consent to process your Personal Data in that manner.

Specifically, we may use your Personal Data for the following purposes:

- **Business Use.** We use your Personal Data primarily to facilitate our ongoing and proposed business dealings with your organization. This includes, without limitation: (i) providing your organization with our products and/or services; (ii) registering you as a user of these products or services and granting you access to our Site; (iv) communicating with you about updates, maintenance, outages, or other technical matters concerning these products and/or services; (v) providing you with training and support regarding usage of these products and/or services; (vi) notifying you about changes to any of the policies and procedures for use of these products and/or services; (vii) verifying the accuracy of the Personal Information we have on file for you and your organization in relation to these products and/or services; and (viii) responding to questions or inquiries that you or your organization may have about our products and/or services. We also may use your Personal Data as required for us to comply with laws and regulations relating to the products or services that we provide in any of the jurisdictions in which Sila operates, and we may use Personal Data

internally within Sila to help us improve our products or services, or to develop new products or services.

We may also use your Personal Data to personalize the content of the Site and communications based on your preferences, and to comply with our legal or contractual obligations and to resolve disputes. Additionally, we may use your Personal Data to protect against or deter fraudulent, illegal, or harmful actions and to enforce our contractual agreements and other legal rights. In all cases in which our legal basis for processing is our legitimate interests or those of our clients or prospective clients, we will use your Personal Data for our legitimate interests provided that those interests are not overridden by your interests or fundamental rights and freedoms

- **Marketing.** With your consent or as otherwise permitted by applicable law, we may use your Personal Data for purposes relating to the marketing of our content, products, and services, or those of our business partners. This includes, without limitation: (i) sending you newsletters, press releases, event announcements, and other similar communications regarding the products or services that we offer; (ii) marketing or promoting our products and/or services to your organization, including by offering your organization limited access to certain of our products and/or services; (iii) soliciting feedback from you regarding improvement of our products and/or services; and (iv) other purposes that we disclosed to you at the time we obtained your consent. If you have not opted in to our providing you with information promoting our business, we will use your Personal Data for our legitimate interests provided that those interests are not overridden by your interests or fundamental rights and freedoms (e.g., if you are a client for news and updates). We will give you the opportunity to opt out at any time.
- **Recruitment.** If you apply to join us, we will be processing your Personal Data based on your application and consent.
- **Business partners.** If you are engaged by us to provide services or supplies, or you wish to be, our processing your Personal Data will be necessary for determining whether the potential collaboration is feasible, for the performance of a contract, or for our other legitimate interests.

We will not use your Personal Data for taking any automated decisions affecting or creating profiles other than as described above.

### Sharing and Transferring Your Personal Data

Sila and our service providers are located in numerous locations around the world. We may share your Personal Data:

- Within Sila;

- With third parties including certain service providers we have retained in connection with the products and/or services we provide, such as online storage providers, consultants, lawyers, or other necessary entities;
- On a confidential basis with third parties to help us provide, improve, and promote our products and/or services;
- With companies providing services for money laundering and terrorist financing checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such Personal Data is shared;
- With courts, law enforcement authorities, regulators, or government officials, and/or with other parties where it is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim;
- With service providers who we engage to process Personal Data for any of the purposes listed above on our behalf and in accordance with our instructions only;
- If we raise any capital or seek additional funding, we may disclose your Personal Data with a prospective investor or lender; and
- If we sell or buy any business or assets, we may disclose your Personal Data to the prospective seller or buyer of such business or assets to whom we assign or novate any of our rights and obligations.

The Personal Data we collect may therefore be collected, transferred to, and stored in countries outside of the jurisdiction you are in. Any international transfers of your Personal Data are made pursuant to appropriate safeguards, such as standard data protection clauses adopted by the European Commission. If you wish to enquire further about these safeguards used, please contact us using the details set out at the end of this Privacy Policy.

We do not sell, rent or otherwise make Personal Data commercially available to any third party, except with your prior permission.

### **Refusal to Provide Necessary Personal Data**

Where we require your Personal Data (i) to provide the products and services contracted by your organization, (ii) to further a professional relationship, venture, or other collaboration, or (iii) to comply with applicable law or regulation, and where you fail to provide that data when requested, we may not be able to provide our products and/or services to your organization or to collaborate with you or your organization.

### **Cookies and Other Tracking Technologies**

## What are Cookies?

Sila collects information using “cookies”. A cookie is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. We may use both session cookies that expire once you close your web browser, and persistent cookies that stay on your computer or mobile device until you delete them to provide you with a more personal and interactive experience on our Site. For instance, when we use a cookie to identify you, you may not have to login a password more than once, thereby saving time while on our Site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our Site.

We use different categories of cookies, including first-party cookies that are served directly by us to your computer or mobile device, and third-party cookies that are served by others through our Site. We use first-party and third-party cookies for a number of reasons. Some cookies are needed for technical reasons for our Site to operate, which are referred to as “essential” or “strictly necessary” cookies. Other cookies enable us to track and target the interests of our users to enhance the experience on our Site. In addition, third parties may serve cookies through our Site for advertising, analytics, and other purposes, as described in more detail below.

## Cookies We Use

Our Site uses the following types of cookies for the purposes described below:

COOKIE NAME	PURPOSE
_ga*	Google Analytics tracking
_return_visit	Suppress pop up on revisit
	Suppress need to fill form on revisit

## Consent to Cookies

If you continue to use our Site, we assume that you consent to receive cookies from our Site. However, if you would prefer to change your cookie settings, you can do so at any time as described below in “Changing Cookie Settings”.

## Changing Cookie Settings

Most browsers automatically accept cookies unless you change your Internet browser settings. If you wish to restrict, block, or delete the cookies set by our Site, you can generally do this through your browser settings. The settings are usually found in the “options” or “preferences” menu of your Internet browser. If you set your Internet

browser preferences to block all cookies, you may not be able to access all or parts of our Site.

If you delete cookies relating to our Site, certain information about you will not be saved for future use, including your cookie preferences, and you may be treated as a new visitor to our Site the next time you visit the Site. This can impact your experience on our Site.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### Third-Party Website Cookies

Our Site links through to third-party websites (including, for example, for news-related purposes, social media, software artifact repositories, user registration and authentication, product documentation, customer support), which may also use cookies over which we have no control. If you wish to receive information about how these third-party websites use your cookies, please check the relevant third party's privacy policies for information about any cookies that may be used.

### Other Tracking and Analytics Information

Sila's use of other tracking and analytics software that may collect information from you is provided below.

- **Do Not Track Policy.** Your browser may offer "Do Not Track" functionality, which allows you to notify websites that you do not wish operators to track certain online activities. Sila does not support Do Not Track requests at this time.
- **Site Analytics.** Analytics and performance cookies are used to gather information about traffic to our Site. The information includes the number of visitors to our Site, the websites that referred visitors to our Site, the pages visited on our Site, and other similar information collected by analytics applications used on our Site (e.g., Google Analytics). We use the analytics information obtained to improve our Site and our product and service offerings. The information generated about your use of our Site may be transferred and saved to a vendor's server. You can: (i) find out more information about Google Analytics cookies here, (ii) find out more about how Google protects your data here, and (iii) prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available here.
- **Web Beacons.** A web beacon, also known as a clear gif, is one of various techniques used on web pages or email, to unobtrusively (usually invisibly) allow checking that a user has accessed some content, such as an email. We may use web beacons to better manage our Site by informing us as to what Site content

is effective. Web beacons are also used to understand whether users read email messages and click on links contained within those messages so we can deliver content that is relevant to users. Our web beacons may collect certain contact information (e.g., an email address associated with a message that contains a web beacon). We may tie the information gathered by web beacons in emails to our customers' Personal Data.

- **Embedded Scripts.** An embedded script is programming code that is designed to collect information about your interactions with our Site, such as which links within our Site you click on, which type of browser or device you use (e.g., mobile or desktop version). We use such information to enhance the user experience of our Site. This code is downloaded onto your device when you access our Site and is deactivated or deleted when you leave our Site.

## How We Keep Your Personal Data Secure

We will take reasonable precautions to protect your Personal Data in our possession from loss, misuse, and unauthorized access or disclosure. While we strive to secure your Personal Data, we cannot warrant or guarantee that this information will be protected under all circumstances, including those beyond our reasonable control.

We have put in place procedures to deal with any actual or suspected Personal Data breach. In the event of any such breach, we have procedures in place to work with applicable regulators. In addition, where we are legally required to do so, we will notify you of breaches affecting your Personal Data.

## How Long We Retain Your Personal Data

Your Personal Data will be retained for so long as we reasonably need to use it for the purposes set out above. In some cases, we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes, or collect fees owed, or is otherwise permitted or required by applicable law, rule, or regulation. Afterwards, we may retain some information in a depersonalized or aggregated form, but not in a way that would identify you personally.

## Your Rights Regarding Your Personal Data

By law you have the right to:

- To request details of the Personal Data we hold about you and how we process it;
- To have the Personal Data we hold rectified or deleted, to restrict our processing of that information, to stop unauthorized transfers of your Personal Data to a

third party and, in some circumstances, to have Personal Data relating to you transferred to another organization;

- To withdraw consent to our processing of your Personal Data; and
- To lodge a complaint in relation to Sila's processing of your Personal Data with a local supervisory authority.

You can learn more about these rights at [ec.europa.eu](http://ec.europa.eu).

If you object to the processing of your Personal Data, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above (see "How We Use Your Personal Data"), or that you may not be able to make use of the services and products offered by Sila. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your Personal Data to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations. If you have provided your consent and wish to withdraw your consent, please follow the opt-out links on any marketing message sent to you or contact us at [legal@silamoney.com](mailto:legal@silamoney.com).

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented, unless there are compelling legitimate grounds for further processing which override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims. Withdrawal of consent to receive marketing communications will not affect the processing of Personal Data necessary for us to provide products or services to you necessitated by any contractual relationship you or your firm has with Sila.

We must ensure that your Personal Data is accurate and up to date, where relevant. Therefore, please advise us of any changes to your information by emailing us at [legal@silamoney.com](mailto:legal@silamoney.com)

If you would like to make a complaint regarding this Privacy Policy or our practices in relation to your Personal Data, please contact us at [legal@silamoney.com](mailto:legal@silamoney.com). We will reply to your complaint as soon as we can.

If you feel that your complaint has not been adequately resolved, please note that the GDPR gives you the right to contact your local data protection supervisory authority.

## Minors

We do not intentionally collect or solicit data relating to anyone under the age of 16. If we learn that we have the Personal Data of a minor under 16, we will attempt to delete the information as soon as possible. If you believe that we might have any Personal Data from a minor under 16, please contact us at [legal@silamoney.com](mailto:legal@silamoney.com)

### **The Internet**

Our Site may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

### **California Privacy Rights**

If you are a resident of the State of California, under the California Civil Code, you have the right to request information on how to exercise your disclosure choice options from companies conducting business in California. To do so, send a request for information indicating your preference as to how you would like us to respond to your request (i.e., email or postal mail). To request such information, either send an email to [legal@silamoney.com](mailto:legal@silamoney.com) or contact us via postal mail, proper postage prepaid, at: Sila Inc., 920 SW 6th Avenue, 12th Floor, Portland, Oregon 97204.

Attn: Your California Privacy Rights

All requests sent via postal mail must be labeled “Your California Privacy Rights” on the envelope or postcard and clearly stated on the actual request. For all requests, please include your name, street address (if you would like a response via postal mail), city, state, and zip code. We will not accept requests via telephone or fax. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

### **Your Consent**

By submitting or providing to us your Personal Data, you consent to the use of that information as set out in this Privacy Policy.

If you apply for employment or work placement, you may need to provide information about your education, employment, right to work, and state of health. Your application will constitute your express consent to our use of this information to assess your application and to allow us to carry out any vetting or monitoring activities, which may be required of us under applicable law as an employer, and which we may undertake to assist us to monitor delivery of our own commitments to diversity and equality.

### **This Privacy Policy**

We may need to revise this Privacy Policy in the future. If we change our Privacy Policy we will post the changes on this page so that you may be aware of the information we collect and how we use it at all times. This Privacy Policy was last updated on September 18, 2018. You should therefore review this page regularly to ensure that you are aware of any changes to its terms. If you have any questions about this Privacy Policy, please contact [legal@silamoney.com](mailto:legal@silamoney.com). Any security concerns should be reported to [contact@silamoney.com](mailto:contact@silamoney.com)