

ESSEVAULT LIMITED PRIVACY POLICY Updated 26th May 2023

This explains the privacy rules applicable to personal information and other information collected or submitted when you access, install, or use EsseVault regardless of the device (computer, mobile phone, tablet, etc.) you use.

The capitalised words used in this Privacy Policy as definitions are defined here or in our General Terms.

By visiting our Websites, by submitting your personal information to us, and by accessing, installing and/or using our Services, you confirm that you have read this Privacy Policy and agree to be bound by the terms of this Privacy Policy. If you do not agree with this Privacy Policy or any provisions hereof, please do not use our Services.

INFORMATION refers to the information you share with us, see below for specific details.

DATA refers to the content of your vaults, the digital files that are stored in your vaults, this data is Zero knowledge encrypted and can not be accessed by EsseVault.

PROCESSING OF YOUR PERSONAL INFORMATION

EsseVault processes personal information to a limited scope to: provide Services, process payments for the Services, and enable the functioning of our Websites and mobile applications. We may process the following categories of personal information:

Information for creating your Account.

Email address. We ask for your email address as part of your registration. It is necessary for creation of your EsseVault account, resetting a lost password, and using the Services.

Payment related information.

Payment information. This information is necessary to collect payments for the Services. Our payment processing partners process basic billing information for payment processing and refund requests (e.g., date of purchase, payer's IP address, credit card owner's full name and credit card information). We also process some of such billing information ourselves (e. g., date of purchase, credit card owner's full name, part of your credit card number, its expiration date) for recurring payments or when you provide your payment details directly to us.

Country details. When making a purchase we process information on the user's country that the purchase takes place from.

Information for payment fraud prevention. To prevent fraudulent payments for the Services, your personal information (such as email address) is verified by our payment processing partners fraud management tools. A payment transaction that is considered high risk may be rejected.

Communication information.

Email address. We use your email address to: i) send you important updates and announcements related to your use of the Services and Websites; ii) responding to your requests or inquiries; iii) sending you offers, surveys, and other marketing content (you can opt-out of those at any time).

Communication optimisation information. We use various tools to help us optimise our emailing campaigns. These tools may track actions you perform with an email, such as open it or unsubscribe

from further communication. We may also be able to see the user device's operating system (e.g., Windows, Mac, iOS, Android) and country in order to optimise, push and email notifications.

Help and support. If you contact us via our Websites, in addition to processing your contact information, we may be able to collect your device information and IP address.

If you contact us for help and support, in addition to processing your contact information, we may also process your device information (such as type of the operating system and browser) and IP address. This information is necessary for our support to determine the user's country, prevent abuse, see if the user is connected to our servers, and help our support to process queries faster.

Information collected on our Website

Access logs. As most websites on the internet, our Websites collect access logs (such as IP address, browser type, operating system) to operate our Services and ensure they are secure, reliable, and give robust performance.. This information is also essential for fighting against DDoS attacks, scanning, and similar hacking attempts.

Cookies Cookies, pixels, and other similar technologies are usually small text or image files that are placed on your device when you visit our Websites. Some cookies are essential for our Websites to operate smoothly; others are used to improve Websites' functionality, analyse aggregated usage statistics to improve Websites' performance. We may also use affiliate cookies to identify the customers referred to our Websites by our partners so that we can grant the referrers their commission.

Referrals information

Information for participating in referral programs. Participation in referral programs maintained by EsseVault requires referrers to submit personal information (e.g., full name, e-mail address, phone number, relationship with the referred party) about themselves and a referred party so that EsseVault can i) reach out to the referred party; ii) contact referrers with regards to their participation in referral programs and/or provision of rewards. It is the referrer's responsibility to abide by applicable privacy laws when disclosing third parties' personal information to EsseVault, including informing third parties that they are providing referred parties' personal information to EsseVault and how it will be used and processed. Referred parties may unsubscribe from any future communication at any time. If you believe that one of your contacts has provided us with your personal information and you would like it to be removed from our database, please contact us.

GROUNDS FOR PROCESSING OF PERSONAL INFORMATION

Your personal information is processed:

Where it is necessary to fulfill our contract with you at your request. Such cases include: i) to provide access to our Services; ii) to process your purchase transactions; iii) to ensure the secure, reliable, and robust performance of our Services and Websites.

When we have a legal obligation to process certain personal information collected from you (e.g., to keep and process records for tax purposes and accounting).

i) to send marketing communication ii) to communicate with you and manage your participation in EsseVaults offers, referrals, or promotions. Please note that although EsseVault may process your personal information for marketing purposes, if you choose not to receive marketing communication from us (i.e., if you opt-out), we will honour your request.

We may sometimes process your personal information, such cases include: i) to properly administer business communication with you; ii) to detect, prevent, or otherwise address fraud, abuse, security, or technical issues with our Services and Websites; iii) to protect against harm to the rights, property, and safety of EsseVault, our users, or third parties; iv) to improve or maintain our Services and provide new products and features; v) to receive knowledge of how our Websites and applications are being used.

SHARING YOUR PERSONAL INFORMATION

Service providers. We use third-party service providers to help us with various operations, such as payment processing, email automation, Websites and app diagnostics, analytics, and other. As a result, some of these service providers may process personal information.

Our service providers may include:

Live chat and support service platforms

Emailing service providers

Marketing, application analytics and diagnostics, e.g., Google Analytics

Payments processing

EsseVault partners. Sometimes our partners, for example, distributors, resellers, and app store partners, will be independent controllers of your personal information. In such cases, the procedures established by them (e.g., terms of service and privacy policies) will apply to such relationships. In other cases we may collaborate with partners as joint controllers meaning that we jointly define the purpose and means of information processing with them. Both joint controllers are then responsible for the information processing and its compliance with applicable privacy laws.

Your personal information may be processed in any country in which we engage service providers and partners. When you use our Services and Websites, you understand and acknowledge that your personal information may be transferred outside of the country where you reside.

Protection of our rights. We may disclose personal information to establish or exercise our legal rights or defend against any legal claims or other complaints. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, and violations of our General Terms.

Business transfers. We may share your personal information in those cases where we sell or negotiate to sell our business or go through a corporate merger, acquisition, consolidation, asset sale, reorganization, or similar event. In these situations, EsseVault will continue to ensure the confidentiality of your personal information.

Zero-knowledge encryption, means that the data is encrypted before a user ever communicates with EsseVault making it impossible for EsseVault to decrypt the data.

EsseVault never has access to the encryption keys required to read your data. In addition, you can log in and access your sensitive information without your account password itself ever being sent over the network to EsseVault.

Only you know your account password, and your Secret Key is generated on your device during setup. The two are combined locally to encrypt your vault data and are never sent to EsseVault. Because only the encrypted data in your EsseVault lives on our servers, neither EsseVault nor an

attacker who manages to figure out your account password would be able to access your vaults, as a result, even if someone steals or guesses your EsseVault account password, they still can't access your account.

Cross-border transfers of personal Information

To facilitate our Services and Websites, we may store, access, and transfer personal information from around the world, including in countries that may not guarantee the same level of protection of personal information as the one in which you reside. We assess the circumstances involving all cross-border information transfers and have suitable safeguards in place to require that your personal information will remain protected in accordance with this Privacy Policy.

CHOICES RELATED TO YOUR PERSONAL INFORMATION

Please note that there are various information protection laws across different jurisdictions that provide privacy rights to you. Subject to those applicable information protection laws, you may have the following rights:

Delete: request us to erase your personal information.

Access: know and access personal information EsseVault has collected about you.

Rectify: rectify, correct, update, or complement inaccurate/incomplete personal information EsseVault has about you.

Object: object to the processing of your personal information which is done on the basis of our legitimate interests (e.g., for marketing purposes).

Portability: request us to provide you with a copy of your personal information in a structured, commonly used and machine-readable format or to transmit (if technically feasible) your personal information to another controller (only where our processing is based on your consent and carried out by automated means).

Restrict: restrict the processing of your personal information (when there is a legal basis for that).

Withdraw consent: withdraw your consent where processing is based on a consent you have previously provided.

Lodge a complaint: exercise your rights by contacting us directly or, if all else fails, by lodging a complaint with a supervisory authority.

Rectification. If you'd like to edit your profile information (e.g., change your email address, add additional username), please contact our support team at support@essevault.com.

Access/Deletion. If you wish to delete access your Account or your personal information that we process, or request to provide you with a copy of your personal information, please contact us at support@essevault.com

Please note that you will need to pass through the Account Verification process so that we can verify you are the owner of the Account before taking further action on your request.

Additionally, you may delete your account.

EsseVault's Obligations on Termination. Upon expiration or termination of your Account and/or Subscription, EsseVault will immediately cease processing information that's associated with you.

However, please note that there might be cases when we retain information associated with you after expiration or termination of your Account and/or Subscription basic information (such as your email address) would still be visible in our system. EsseVault may also retain information associated with you (e.g., payments information) in order to fulfill its obligations as required by applicable laws, regulations, court orders, subpoenas, or other legal processes for archival purposes.

Opt-out. If you wish to unsubscribe from our communication, you can opt out at any time by clicking the “unsubscribe” link at the bottom of each email or contacting us at support@essevault.com.

You can control the use of cookies at the individual browser level on your device. To disable cookies, follow your browser’s instructions on how to block or clear cookies.

If you do not agree with the processing of your personal information by Essevault, please do not use our Services, Applications and Websites. You can request us to discontinue processing your personal information, in which case your information will be processed only as much as it is necessary to effect the discontinuation of your use of our Services (e.g., final settlement or deleting all personal information based on your email address), or finalising other EsseVault legal relationship with you (e.g., record keeping, accounting, processing refunds). Please note that we or our third-party service providers may be obliged to retain some of your personal information as required by law.

To raise any other questions, concerns, or complaints about our privacy practices or about our processing of your personal information, please contact us at support@essevault.com.

INFORMATION SECURITY

We maintain tight controls over the personal information we collect. Our security team has implemented appropriate physical, technical, and organizational measures to protect information about you against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure, or access and against all other unlawful forms of processing:

If we detect something suspicious. We will notify you immediately and guide you through steps to stay better protected. However, no company can guarantee the absolute security of internet communications as no technology is completely bulletproof. By using the Services and Websites, you expressly acknowledge that we cannot guarantee the 100% security of personal information provided to or received by us through the Services and that any information received from you through Websites or our Services is provided at your own responsibility. If you have any reason to believe that your interaction with us is no longer secure, please notify us at support@essevault.com.

INFORMATION RETENTION AND DELETION

EsseVault will keep your personal information only as long as necessary to provide you with the Services, or for as long as we have another legitimate ground to do so, but not longer than permitted or required by law. Some of the more specific information retention terms are provided below:

Customer billing information and payment details are kept by EsseVault for seven years from the last payment transaction.

When we no longer have a legal ground to keep your personal information, it will either be securely disposed of, or de-identified through appropriate anonymisation means.

OTHER TERMS

Limitation of Liability. To ensure the security of personal information, EsseVault employs various technical, physical, and organisational security measures; however, it is your responsibility to exercise caution and reason when using the Services and Websites. You will be personally liable if your use of the Services and Websites violates any third party privacy or any other rights or any applicable laws. Under no circumstances is EsseVault liable for the consequences of your unlawful, willful and negligent activities, and any circumstances that may not have been reasonably controlled or foreseen (please read the General Terms for more information).

Updates to the Privacy Policy. We develop our Services and Websites introducing new features or modifying current ones constantly. Therefore, we may need to amend the Privacy Policy from time to time.

CONTACT US

If you have questions, requests, concerns, or complaints about this Privacy Policy or our personal information processing practices, please contact us via support@essevault.com.