



Nebulic OÜ, Harju maakond, Tallinn, Kesklinna linnaosa, Narva mnt 5, 10117

Nebula Network Privacy Policy

Last updated: 2018-07-23

Nebulic OÜ (“Company” or “we” or “us” or “our”) respects the privacy of our users (“user” or “you” or “Backer”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our websites related to the Nebula Network project (“Project”) as made available under the <https://nebula.network> domain (“Website” or “Websites”) or partake in any offer or program made available in relation to the Project. Please read this privacy policy carefully, and to its full extent. If you do not agree with the terms of this privacy policy, please do not access the Websites or partake in any offer or program offered within. By continuing to use the Websites or subscribing to any offer or program within you consent to our Privacy Policy.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last updated” date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Websites, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Websites or additional engagement with any offer or program offered within after the date such revised Privacy Policy is posted.

What Information Do We Collect and When?

We collect personally identifiable information from you when you subscribe to our newsletter, register as a Backer, respond to a survey or marketing communication, or fill out a form on any of our Websites. The data encompasses anything you fill on the forms on the Websites, such as name, email address, or where applicable information required for ‘know your customer’ (“KYC”) and ‘anti-money laundering’ (“AML”) checks, and might also additionally include automatically collected data provided by your browser when connecting to our servers such as IP address, and user agent strings.

Additionally non personally identifiable information might be collected when you visit our Websites as described below.

How do we use your information?

We may use the information we collect as described in the previous section in the following ways:

- To administer any program including but not limited to funding, contest, promotion, or survey.
- To enhance the security of our Websites and related programs, and spot potential breaches.
- To quickly process your requests or transactions.
- To improve our Websites in order to better serve you.
- To allow us to better service you in responding to your customer service requests.
- To send periodic emails regarding your order or other products and services, if you have given your clear consent.
- To follow up with them after correspondence (email, live chat, or phone inquiries).
- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.

The Company may, from time to time, take direct contact with you to obtain additional information or regarding the need to process the personal data for some other purpose.

Term and location of processing

We retain the personal information we collect from you where we have a legal ground to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no legal ground to process your personal information, we will either delete or anonymise the data or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

We will anonymise or aggregate your data if we intend to use it for analytical purposes or trend analysis over longer periods.

In some cases we might ask your consent to retain the personal data.

Cookies and Analytics

The Websites might use cookies and other behavior tracking technologies. They might be used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services and supply additional security measures. We compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since every browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookie settings.

We do not include or offer third-party products or services on our Websites, other than listing systems compatible with the Company's products.

Our Websites might use Google Analytics. We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to optimize website experience

Opting out:

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

How do we protect your information?

Our Websites are scanned on a regular basis for security holes and known vulnerabilities in order to make your visits as safe as possible.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive information you supply is encrypted via Secure Socket Layer (SSL) technology.

Third-parties

We do not sell or trade or offer any of your personally identifiable information to any third parties. This does not include trusted third parties who assist us in operating our Websites, conducting our business,

or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety, or comply with KYC and AML checks.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

We do not include or offer third-party products or services on our Websites, although there might be links to third-party websites on our Websites. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

COPPA (Children Online Privacy Protection Act)

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under the age of 13 years old.

Fair Information Practices

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach be detected we will notify you via email within 7 business days.

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

California Online Privacy Protection Act

California Online Privacy Protection Act (“CalOPPA” is the first state law in the United States to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. See more at:

<https://consumercal.org/california-online-privacy-protection-act-caloppa/>

According to CalOPPA, we agree to the following:

- Users can visit our site anonymously.
- Once this Privacy Policy is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our Website.
- Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.

You will be notified of any Privacy Policy changes on our Privacy Policy Page.

You can change your personal information by contacting us through the addresses provided in the 'Contacting Us' section of this Privacy Policy.

Our Websites do not respond to Do Not Track (DNT) signals.

We do allow third-party behavioral tracking on our behalf as described in the previous sections.

CAN SPAM Act

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions
- Process orders and to send information and updates pertaining to orders.
- Send you additional information related to your product and/or service
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

To be in accordance with CAN-SPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.

Allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, you can contact us through the addresses provided in the 'Contacting Us' section of this Privacy Policy.

Online Privacy Policy Only

This online privacy policy applies only to information collected through our Websites and not to information collected offline.

Data subject's rights

Right of access

The GDPR gives you the right to access information that we held about you. If you want to access that information, please send you request at contact@nebula.network.

Any request for access of your information shall be a subject to providing the acceptable proof of identification. If all complies, you will be provided with the copy of your personal data. If a person's request for information or measures is clearly unjustified or excessive, a reasonable fee may be asked or the action taken may be refused.

Right of rectification

You can have your personal data rectified at any time, in case it is inaccurate or incomplete. You should notify us to correct or update your personal data. You can notify us at any time at contact@nebula.network.

Right of erasure

You can request to delete your personal data at any time by contacting us at contact@nebula.network. When the personal data is being used to satisfy a legal obligation, Company may be required to retain that data.

Right to restrict processing

In certain circumstances, you have a right to restrict or block us from processing your personal data.

Right to withdraw your consent

In cases the legal ground for processing is your consent, you have the right to withdraw your consent to processing of your personal data at any time by contacting us at contact@nebula.network.

Right to data portability

Starting May 25, 2018, you have a right to request the personal data from us and reuse this data for other services. If Company intends to process your personal data for purposes other than those for which they were originally collected, you will be informed in advance of the purpose of further processing the data in question.

Right to object

At any given time, you have a right to object to the processing of your personal data.

Right related to automation

You are protected from automated decision making processes.

Governing law, jurisdiction and submitting complaints

This Privacy Policy and obligations arising from or related to it are governed by the legislation of the Republic of Estonia.

Any and all disputes arising from or related to the personal data protection will be settled by the parties by way of negotiations. Failing agreement, the you shall have the right to lodge a complaint with the supervisory authority Estonian Data Protection Inspectorate, Väike-Ameerika 19, 10129 Tallinn, Estonia, or a claim to court.

In case the dispute between the parties is to be resolved in judicial proceedings, the parties agree to refer the dispute to Harju County Court in accordance with the legislation in force in the Republic of Estonia.

The above mentioned does not exclude consumers from their rights regarding jurisdiction.

Contacting Us

You may contact us using the information below:

Nebulic OÜ

Harju maakond, Tallinn, Kesklinna linnaosa, Narva mnt 5, 10117

Estonia

contact@nebula.network