

Privacy Policy

We are committed to protecting the privacy of our users and visitors. The following Privacy Policy outlines the information JewelPay OÜ Private limited company, the “Company”) may collect and how we may use that information to better serve its visitors, participating merchants, charitable organizations and members. All terms not defined herein shall have the meanings described in the Terms of Service.

If you have questions about this Privacy Policy, please contact us at info@jewelpay.org.

1. Children Under the Age of 18

The Services are meant for adults only, and children may not register for accounts. The Company does not knowingly collect or maintain personally identifiable information or non-personally-identifiable information from persons under 18 years of age, and no part of our website is directed to persons under 18. If you are under 18 years of age, then please do not use or access the Services at any time or in any manner. If Company learns that personally identifiable information of persons under 18 years of age has been collected on the Services without verified parental consent, then Company will take the appropriate steps to delete this information.

2. Information We Collect

When registering for an account and/or using our Services, we may ask that you provide us with some personally identifiable information – information about you that can be used to contact or identify you, and information on your use /or potential use of the Services and related services (“Personal Information”). Personal Information that we may collect include, phone numbers, FBUID (for verification through Facebook) and email address.

If you submit Personal Information to us through the Services, then we may use your personal information to operate, maintain, and provide to you the features and functionality of the Services.

We may employ third party companies or individuals to process Personal Information on our behalf based on our instructions and in compliance with this Privacy Policy. For example, we may share data with a security consultant to help us get better at identifying spam or with third party analytics providers to optimize our site and gather aggregate data on where lumens are popular. In addition, some of the information we request may be collected by third party providers on our behalf.

We do not use your phone number or email address or other Personal Information to send commercial or marketing messages without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out. We may, however, use your email address without further consent for non-marketing or administrative purposes (such as notifying you of major service changes or for customer service purposes).

We, and any authorized third party analytics providers may collect and may use both your Personal Information and certain non-personally-identifiable information (such as anonymous User usage data, cookies, IP addresses, browser type, clickstream data, etc.) to improve the quality and design of the Service and the Company website, to

comply with applicable laws and regulation, and to create new features, promotions, functionality, and other services by storing, tracking, and analyzing User preferences and trends. We, and any authorized third party analytics providers may use cookies and log file information to: (a) monitor individual and aggregate metrics such as total number of visitors, pages viewed, etc.; and (b) track your logins, entries, submissions, views and such. We, and any authorized third party analytics providers may utilize session ID cookies to enable certain features of the Services or Company applications. Session ID cookies are typically deleted from your computer when you log off from the Services and then close your browser.

At any time, you can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Please understand that if you do not accept cookies, you may not be able to use all portions or all functionality of the Services.

For these purposes, when you use our Services through an application, our servers may (i) automatically record information that your mobile phone/device sends or transmits, including, but not limited to, your phone's device ID number, user settings, location (if you consent to that) and information about your use of the Services, and (ii) record information derived from such information and other sources. We also may be given such information from our third party analytics providers, affiliated partner(s), participating merchants and charitable organizations for whom the Services are being sponsored by, provided on behalf of, or provided in partnership with ("Affiliated Partners"). If we accept this information with our Affiliated Partners, we will require in our agreements with our Affiliated Partners that this information will not be transferred to the Company without the actual user's consent. However, we will not be liable or responsible for the Affiliated Partners' compliance with these agreements.

In order to provide any location-based Services related to your use of a Company application, Company and/or its Affiliated Partners may collect, use, and share with us precise location data, including the real-time geographic location of your mobile device. This location data is collected anonymously in a form that does not personally identify you and is used by Company to provide and improve the Services and comply with any applicable laws and regulations. For example, we may share geographic location data with partners in order to support our distributions of contributed funds to particular charities or other recipients.

3. How We Use Your Information

Among our primary goals in collecting information is to provide you with a positive experience when visiting our website and to make our site more valuable to you. We use this information to closely monitor which areas of the website are used most and to determine which areas we need to focus on improving. This information is used exclusively by Company in aggregate form so that we may continue to improve the value of the Services and information on the Services for our users as a whole.

As a valued user of Services, we may occasionally contact you, typically by e-mail (or any other way you prefer) in order to notify you of special promotions, and up-to-date news. Of course, if you do not wish to receive this personalized information, you can remove yourself from receiving such information by changing the appropriate option in your user account.

The Company uses your Internet Protocol (IP) address to help diagnose problems with our computer server, and to administer our website. Your IP address is used to help identify you, and to gather broad demographic data, as well as assist in compliance with any applicable laws or regulations the Company is subject to. Your IP address contains no personal information about you.

Except as described above, we will not monitor, edit or disclose any Personal Information about you or your account, without your prior consent unless we have a belief that such action is necessary to: (i) comply with the valid legal process or other legal requirements of any United States governmental authority; (ii) protect and defend the rights or property of the Company; (iii) enforce our Terms of Service <https://www.stellar.org/terms-of-service>; or (iv) protect the interests of users of our Services other than you or any other person.

4. Our Disclosure of Your Information

The Company and any authorized third party analytics providers may perform aggregate statistical analysis of customer usage in order to measure interest in, and use of, the various parts of the Service and other applications, and Company may share that information with other interested third parties or the public. Any information shared in this manner is aggregated data only (statistics, etc.), and contains no Personal Information whatsoever (other than what is aggregated and anonymized).

Company cooperates with all valid United States law enforcement notices or orders and with all third parties to enforce their intellectual property or other rights.

You should be aware that if you voluntarily disclose personal information and make it publicly viewable, that publicly available information might be collected and disseminated by third-parties, and result in, among other things, unsolicited inquiries, messages, and offers from third-parties. Please understand that any information that is disclosed in that manner becomes public information and this third-party conduct is out of the control of Company. Please exercise caution when deciding to publicly disclose your personal information.

The Services may also contains links to other web sites. Company is not responsible for the privacy practices or the content of such web sites.

5. Security

The Personal Information we collect is securely stored within our database, and we use standard, industry-wide practices such as encryption, firewalls and (in some certain areas) SSL (Secure Socket Layers) for protecting your information. However, as effective as encryption technology is, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the Internet. We recommend that you not disclose your password to anyone.

6. Revisions and Amendments

If you have further privacy concerns please do not hesitate to ask us by contacting info@jewelpay.org. This Privacy Policy is effective as of Tuesday the 23th, September 2018. This Privacy Policy is not intended to and does not create any contractual or other legal rights in or on behalf of any party. Company reserves the

right, at any time and without notice, to add to, modify, change or update this Privacy Policy, simply by posting such change, update or modification on www.jewelpay.org. Any such change, update or modification will be effective immediately upon posting on the Company's website.