

Privacy Policy

(Last Updated: December 29, 2022)

The privacy of our customers is our top priority. We handle your personal data in a fully transparent and legally compliant manner. We also take all precautions when handling your personal data and protecting it from unauthorized access. The following privacy policy outlines the circumstances and conditions under which information is stored by us, processed, or, as the case may be, transferred to third parties.

Savl Limited (“**Savl**,” “**we**,” “**our**,” and/or “**us**”) values the privacy of individuals who use our websites (including savl.com (the “**Website**” or “**Site**”)), applications, or services, and any services that link to this Privacy Policy (collectively, our “**Services**”). This privacy policy (the “**Privacy Policy**”) explains how we collect, use, and disclose Personal Data from users of our Software, Site, and Services. For the purposes of this Privacy Policy, “**Personal Data**” means information that relates to an identified or identifiable natural person.

By using our Site or Services, you agree to the collection, use, and disclosure of your Personal Data as described in this Privacy Policy. Beyond this Privacy Policy, your use of our Site or Services is also subject to our [Terms of Use](#).

Savl Wallet is a non-custodial crypto asset software wallet, we do not have customer accounts. We do not require you to provide your Personal Data to us to use the Savl Wallet. If you sign up for our newsletter or provide your Personal Data in a customer service ticket, that information will be collected by us. However, certain advanced services may require government-level compliance, and certain third-party API providers may require you to provide them with Personal Data to use their services through the Savl Wallet.

INFORMATION WE COLLECT

We may collect Personal Data from or about you or your devices from various sources, as described below.

Information You Provide to Us. When you contact us or sign up for our newsletter, we collect any Personal Data you provide to us, such as your name and email address.

Collection and Processing of Mobile App Data: (1) When you download our mobile app from an app store, the necessary information is sent to the app store, in particular the user name, email address, and customer number of your account, the time of the download, the payment information, and the individual device code. Depending on the end device used, the app store will either be the iOS App Store by Apple Inc. (“Apple”) or Google Play Store by Google LLC. (“Google”). We have no influence on this data collection and are not responsible for it. We process such data only to the extent necessary for downloading the mobile app onto your mobile device.

Apple’s privacy policy: <https://www.apple.com/legal/privacy/>

Google’s privacy policy: <https://policies.google.com/>

APPLICATION INFORMATION WE COLLECT

When you use our mobile app, we collect additional personal data that we require to provide you with the functions of our mobile app as well as to improve it and to ensure the stability and safety of use. The nature and composition of the data processed and stored by us depend on the concrete use of our app by the end user. The data stored and processed by us are, for example,

1. Mobile phone number of the user, to enable you to use certain features of our application.
2. Email address and country that the user has selected during the registration process in order to promote the security of our services.
3. Preferred fiat currency of the user, e.g., USD, GBP, EUR, to facilitate the use of our services.
4. The date of registration and the last profile update to promote the security of users in their use of the application.
5. The individual address of the investments blockchain, as well as a list of the public user, addresses from the most currently common crypto-currencies to enable transactions within the application.
6. The optional synchronization of contacts in the address book on the mobile device of the user with the registered users of SAVL enables transactions between the user and the saved contacts of the user within the application.
7. Transactions of the user within the app to ensure secure use of the application
8. Technical usage information such as hash values and tokens for facilitating and simplifying the login process in the application.

AUTOMATICALLY COLLECTED INFORMATION

We may automatically collect information about you and your devices when you use our Site or Services. For example, when you visit our Website, we collect your internet protocol (IP) address, web browser type, web browser language, operating system type, the website you visited before browsing our website, a pseudonymous User ID that is unique to Savl for internal use in improving its products and services, the pages you view, the length of time you spend on a page, the dates and times of your visits, the hyperlinks you click on, and other information about your use of our Website. When performing an exchange through a third-party API provider, we log information such as the wallet addresses and transaction IDs.

Cookies. We (and third-party API providers) may collect information using cookies, pixel tags, or similar technologies. Our third-party partners, such as analytics or advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Site.

For further information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org.

You can block cookies by setting your internet browser to block some or all of the cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our Site and Services. You can change your browser settings to block or notify you when you receive a cookie, delete cookies or browse our Site using your browser's anonymous usage setting. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings. If you do not agree to our use of cookies or similar technologies which store information on your device, you should change your browser settings accordingly. You should understand that some features of our Site or Services may not function properly if you do not accept cookies or these technologies. Where applicable law requires, you will be asked to consent to certain cookies and similar technologies before we use or install them on your computer or another device.

Information We Receive From Third Parties. We may receive Personal Data about you from third parties, such as data or marketing partners, and combine it with other Personal Data we have about you.

Appsflyer: This website uses the Appsflyer web analytics service provided by AppsFlyer Ltd. ("Appsflyer").

A list of the data stored and processed by AppsFlyer can be found here:

<https://www.appsflyer.com/services-privacy-policy/>

AppsFlyer will process this information in our commission in order to evaluate the use of our online services by the users and generate reports on user activities within these online services for the purposes of analysis and optimization of our services.

AppsFlyer may need to transfer Customer Data to countries other than the country from which the Data originated. Any such transfer shall be done in compliance with all applicable laws. With regards to the collection, use, and retention of personal data transferred from the European Economic Area or Switzerland to the United States, AppsFlyer complies with the EU-U.S. and Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce, by which AppsFlyer demonstrates in accordance with chaps 45, 46 GDPR that it complies with the level of data protection in accordance with the GDPR. **The data protection policy of AppsFlyer can be found here:**

<https://www.appsflyer.com/services-privacy-policy/>

Your IP address is stored by our partner only in an abbreviated form and evaluated for us so that only a rough localization of your IP down to the country of origin is possible. AppsFlyer provides End Users with the ability to opt-out of being measured by the Services by emailing a request to privacy@appsflyer.com or by completing the form here: <https://www.appsflyer.com/optout/>

Sum&Substance: Within the application of our mobile app we make use of the digital identification service Sum&Substance of the Sum and Substance Ltd. Sum&Substance will store and process the following information on our behalf, in order to adhere to the legal provisions relating to the services offered by us in our mobile app and to support the security of the transactions carried out via our mobile app.

Sum&Substance exclusively stores the personal data of users on a server within the area of application of the GDPR in the European Union.

Your IP address is stored by our partner only in an abbreviated form and evaluated for us so that only a rough localization of your IP down to the country of origin is possible.

The data protection policy of Sum&Substance can be found here:

<https://sumsub.com/security-compliance/>

How we use this data:

- To provide, maintain, debug, improve, and enhance our Site and Services.
- To understand and analyze how you use our Site and Services and develop new products, services, features, and functionality.
- To communicate with you, provide you with updates and other information relating to our Site and Services, provide information that you request, provide you with our newsletter, respond to comments and questions, and otherwise provide customer support.
- For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable, or otherwise of interest to you.
- To personalize your experience on our Site, such as identifying you as a repeat visitor.
- To facilitate the connection of third-party services or applications.
- To create de-identified and/or aggregated data to improve our business purposes, including to improve our Services.
- To find and prevent fraud, detect security incidents, and respond to trust and safety issues that may arise.

- For compliance purposes, including enforcing our Terms of Service or other legal rights, as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- To contract with third-party API providers, including providing customer service, verifying customer information, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- For other purposes for which we provide specific notice at the time the Personal Data is collected.

LEGAL BASIS FOR PROCESSING EUROPEAN PERSONAL DATA

If you are located in the European Economic Area or the United Kingdom, we only process your Personal Data when we have a valid “legal basis,” including when:

- **Consent is given.** You have consented to the use of your Personal Data, for example, to send you marketing communications or to use cookies.
- **Contractual necessity.** We need your Personal Data to provide you with the Services, for example, to respond to your inquiries.
- **Compliance with a legal obligation.** We have a legal obligation to use your Personal Data, for example, to comply with tax and accounting obligations.
- **Legitimate interests.** We (or a third party) have a legitimate interest in using your Personal Data. In particular, we have a legitimate interest in using your Personal Data for product development and internal analytics purposes and otherwise to improve the safety, security, and performance of our Site and Services. We only rely on our or a third party’s legitimate interests to process your Personal Data when these interests are not overridden by your rights and interests.

DATA SHARING

We do not share or otherwise disclose Personal Data we collect from or about you except as described below or otherwise disclosed to you at the time of collection.

- **Affiliates.** We may share any information we receive with our affiliates for any purpose described in this Privacy Policy.
- **Analytics Partners.** We use analytics services such as Google Analytics to collect and process certain analytics data. These services also may collect information about your use of other websites and online resources.
- **As Required by Law and Similar Disclosures.** We may access, preserve, and disclose your Personal Data if we believe doing so is required or appropriate to (i) comply with applicable laws; (ii) respond to law enforcement requests and legal processes, such as a court order or subpoena; or (iii) protect the rights, property, and safety of Savl, our employees, agents, customers, and others, including to enforce our agreements, policies, and Terms of Service.
- **Merger, Sale, or Other Asset Transfers.** We may transfer your Personal Data to service providers, advisors, potential third-party API providers, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company, or we sell, liquidate, or transfer all or a portion of our assets.
- **Vendors and Service Providers.** We may share your information with vendors and service providers retained in connection with the provision of our Services.
- **Consent.** We also may disclose your Personal Data with your consent.

INTERNATIONAL DATA TRANSFERS: Your information, including the Personal Data that you provide to us, may be transferred to, stored at, and processed by us outside the country in which you reside, including, but not limited to, the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By providing any information, including

Personal Data, on our Site, you consent to such transfer, storage, and processing. We may also transfer Personal Data from the European Economic Area or the United Kingdom to the United States, as needed, to perform the Services that you have requested from us. We will take steps that we believe reasonably necessary to treat your Personal Data securely and in accordance with this Policy.

SECURITY: We use reasonable organizational, technical, and administrative measures to protect Personal Data within our organization. However, as no electronic transmission or storage of Personal Data can be entirely secure, we can make no guarantees as to the security or privacy of your Personal Data. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us via the "Contact Information" section below.

RETENTION: We will only retain your Personal Data as long as reasonably required for us to provide the requested customer support and inquiry services. In the context of customer support, we retain information sufficient to connect subsequent requests from the same user in order to provide efficient service unless a longer retention period is required or permitted by law (for example, for regulatory purposes).

THIRD-PARTIES: Our Site may contain links or API connections to other websites, products, or services that we do not own or operate. We are not responsible for the privacy and advertising practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party API providers or any Personal Data you disclose to these third parties. We encourage you to read their privacy policies before providing personal data to them.

DO NOT TRACK SIGNALS: Some Internet browsers may be configured to send "Do Not Track" signals to the online sites that you visit. There is no accepted standard for responding to Do Not Track signals, and we do not respond to such signals. To learn more about "Do Not Track," please visit <http://www.allaboutdnt.com>

MINORS: Our website, our mobile app and the services offered by us are not conceived or designed for minors, children under the age of 16. We will not knowingly collect or store information from minors.

YOUR RIGHTS AND CHOICES

Under the General Data Protection Regulation (GDPR) as set out by the European Union (EU) and the European Economic Area (EEA), you have the following rights:

- Right to information (chap. 15 GDPR)
- Right to rectification (chap. 16 GDPR) or deletion (chap. 17 GDPR)
- Right to limitation of processing (chap. 18 GDPR)
- Right to object to the processing (chap. 21 GDPR)
- Right to data portability (chap. 20 GDPR)

You also have the right to appeal to a data protection supervisory authority concerning the processing of your personal data. Before you take this path, however, we ask that you contact us directly with your concerns at app@savl.com. Your right of appeal will not be affected by this.

The following rights apply to everyone irrespective of their geographical location:

Opt-out. You may contact us anytime to opt-out of: (i) automated decision-making and/or profiling; (ii) any new processing of your Personal Data that we may carry out beyond the original purpose; (iii) any consent you previously provided to us regarding the processing of your Personal Data; or (iv) the transfer of your Personal Data outside the EEA. We will apply your preferences going forward, and this will not

affect the lawfulness of the processing before you withdraw your consent. Please note that using parts of our Website may be ineffective upon opt-out.

Access. You may access the information we hold about you by contacting us via the “Contact Information” section below.

Amend. You may update or correct any inaccuracies in your Personal Data by contacting us via the “Contact Information” section below. **Restrict or Object.** You may request us to restrict the processing of your Personal Data or object to our processing of your Personal Data via the “Contact Information” section below.

Move. Your Personal Data is portable – i.e., you have the flexibility to move your data to other service providers as you wish.

Erase. In certain situations, for example, when the information we hold about you is no longer relevant or is incorrect, you may request that we erase your data.

Exercising Your Rights. If you wish to exercise any of these rights, please contact us via the “Contact Information” section below. In your request, please clearly describe: (i) what Personal Data is concerned and; (ii) which of the above rights you would like to enforce. For your protection, we only process requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before processing your request. We will try to comply with your request as soon as reasonably practicable and, in any event, within thirty (30) days of your request. Please note that there are exceptions and limitations to each of these rights and that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain information for backups, archiving, prevention of fraud and abuse, analytics, the satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason for such retention.

Marketing Communications: You may unsubscribe from our promotional emails via the link provided in the emails. Even if you opt-out of receiving promotional messages from us, you will continue to receive administrative messages from us.

COMPLAINTS: We are committed to resolving any complaints about our collection or use of your Personal Data. If you would like to make a complaint regarding this Privacy Policy or our practices in relation to your Personal Data, please contact us as set forth below. We will reply to your complaint as soon as possible and, in any event, within thirty (30) days. We hope to resolve any complaint brought to our attention; however, if you feel that your complaint has not been adequately resolved, you have the right to contact your local data protection supervisory authority.

CONTACT INFORMATION: We welcome your comments or questions regarding our privacy practices. If you have questions about your privacy related to the Site or Services or this Privacy Policy, you may contact us at the address below.

190 Elfin Avenue, George Town, Grand Cayman KY1-9001, Cayman Islands app@savl.com

CHANGES TO THIS PRIVACY POLICY: We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share Personal Data previously collected from you through our Site or Services, we will attempt to notify you by email or other means.