

NuID, Inc.

Privacy Policy

Last updated on June 10, 2020

We at NuID, Inc. ("**NuID**," "**we**," or "**us**") know that our users ("**you**" or "**your**") care about how their information is used and shared, and the privacy and security of your personal information is important to us. NuID was founded with the mission of returning data ownership to the individual. We aim to embody this not only in the products and services that we provide, but also in our everyday business practices. If you have any questions at all about this Privacy Policy, please do not hesitate to contact us at privacy@nuid.io.

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Applicability of this Privacy Policy

This Privacy Policy ("**Privacy Policy**") applies to our website at <https://nuid.io> and other associated websites and mobile applications (collectively, the "**Site**") and our trustless authentication solution delivered through REST API and SDK, and other features, tools, materials, or other services offered from time to time by us (the "**Services**") and explains how we collect, use, share and otherwise process information relating to natural persons ("**Personal Information**"). All capitalized terms not herein defined will have the meaning set forth in our Terms of Service. This Privacy Policy applies to any user of or visitor to our Site and/or Services. We process Personal Information in the role of a controller as described in this Privacy Policy. We may also process Personal Information in the role of a processor where your Personal Information was submitted to us by one of our customers or partners. If you wish to exercise any of your rights with respect to your Personal Information, please contact the applicable customer or partner directly.

We may update this Privacy Policy from time to time to reflect changes in our privacy practices. If we do, we will notify you of any changes by posting notice on our Site or by sending notice to the primary email address specified in your account, at which point we will update the "Last Updated" date at the top of the page. Changes that materially affect your rights or our obligations will go into effect thirty (30) days following the "Last Updated" date. Non-material changes or clarifications will take effect immediately. We encourage you to periodically check the Site and this page for updates.

You acknowledge that your use of our Site or Services indicates to us that you have read this Privacy Policy and consent to the privacy practices described, and your continued use of our Site or Services after we publish or send

a notice about any changes to this Privacy Policy indicates that you have read and consent to the updated Privacy Policy.

What Information Do We Collect?

We collect information, including Personal Information, only where we have a lawful basis. Lawful bases on which we rely include your consent where you have given it, contract where processing is necessary for us to perform our obligations pursuant to a contract with you, and legitimate interests of our business such as operating and providing the Site and Services to you.

We collect, store, and use the following categories of information, which includes Personal Information:

Information you give us:

- Your name, email address, employer, and any other information you voluntarily share when you create an account on our Site or otherwise access our Services.
- Your responses to surveys that we may ask you to complete for research purposes or to help direct our activities.
- Other Personal Information you voluntarily submit, which may include your profession, gender, date of birth, your profile picture, etc.
- Payment details such as billing address and credit card or banking information.
- Any information you share when you contact us.

Information we get from your use of the Site and/or Services:

- Details of how you use the Site and/or Services.
- Your internet protocol address (i.e., IP address) and, if you access the Site or Services from a mobile application, your unique mobile device ID number and non-email authentication.
- Details of financial transactions (if any) you participate in on the Site and/or Services, including the amount, currency, and method of payment.
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- Browser and device information and information collected through Tracking Technologies (defined below), such as cookies, pixel tags, and other technologies.

A note on the use of NuID's "Nebulous" API, including the NebulousAD tool:

NuID's Nebulous API is a service that allows users to check hashed passwords against a database of passwords that have been found in previous data breaches. The API is also available through the use of NuID's NebulousAD tool for checking passwords in an Active Directory domain. More details can be found [here](#). Information collected by NuID from users of the Nebulous API includes:

- Email and login credentials used to register an API key at <https://nebulous.nuid.io>
- IP address
- API key
- Usage metrics such as time, hash type queried, and number of queries

We DO NOT collect or store the hashes queried by Nebulous API users. Users can take advantage of our k-anonymity search function (details [here](#)) to avoid sending any complete hashes to the Nebulous API. However, if users do elect to send complete hashes to the API, those hashes are not collected, stored, or logged by Nebulous API.

How Do We Use The Information We Collect?

We use the information we collect for a variety of purposes, including to improve the Site and/or Services, optimize our technology [and algorithms], and refine and customize our offerings and user experience.

In particular, we use the information we collect to:

- Administer the Site and provide the Services, enable you to use its features, and improve the overall user experience.
- Communicate with you through email, text, SMS, message via social media platforms, telephone, or any other medium for which we have contact information so that we can provide you with information and updates about us, our work, and our community, and to make it easier for you to share such information about us with your social networks.
- Send information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.
- Respond to comments and questions and provide technical support and customer support.
- Analyze how users use the Site and Services using tools like Google Analytics and other tools to help us understand traffic patterns and know if there are problems with the Site and/or Services.
- Create targeted advertising to promote the Site and Services and engage our users.
- Protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.
- Link or combine user information with other Personal Information.
- Compare information for accuracy, update our records, and verify it with third parties.

Do We Share Your Personal Information?

We do not rent, sell, or share your Personal Information with other people or non-affiliated third parties except with your consent or as necessary to complete any transaction or provide you with the Services or any specific service you have requested or authorized. We do not share personal data with third parties for their direct marketing purposes without your consent.

To help us do our work, we may provide limited access to some of your Personal Information to the following third parties, each of which is only disclosed your Personal Information if, and to the extent that, they need to know such information to carry out their services.

- **Collaborating Organizations:** Sometimes we collaborate closely with other groups to further our mission. In these cases, we may share your name, contact information and other details you provided when making an account with our partners.
- **Service Providers:** We work with a wide range of third party providers, notably our database administrators, cloud computing services, advertising services, data analysts, application service providers, bulk SMS services, and other non-governmental organizations. We do not authorize them to use or disclose your Personal Information except in connection with providing their services.
- **Payment processors:** We may work with payment processors such as PayPal and Stripe to help process credit card transactions and other payment methods made through the Site and Services. These payment processors will store certain information about you. Please refer to their privacy policies to learn more about how they use your Personal Information.

We may also transfer your Personal Information to a third party as a result of a merger, acquisition, reorganization or similar transaction; when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security of the Site and/or Services; and to protect our rights or property. In such event, and to the extent legally permitted, we will notify you and, if there are material changes in relation to the processing of your Personal Information, give you an opportunity to consent to such changes.

We will also share Personal Information with companies, organizations or individuals outside of NuID if we have a good-faith belief that access, use, preservation, or disclosure of your Personal Information is reasonably necessary to (1) detect or protect against fraud or security issues, to enforce our Terms of Service, (2) meet any enforceable

government request, (3) defend against legal claims, or protect against harm our legal rights or safety, or that of our staff and/or users.

Cookie Policy - What are Tracking Technologies, such as Cookies and Web Beacons, and How Do We Use Them?

We, or third parties we do business with, may use certain technologies to automatically collect log files and other information about your usage of, and the devices you use to access, the Site and the Services ("**Tracking Technologies**"). For example, we may use Tracking Technologies like cookies, log files, web beacons, session replay scripts, or similar technologies to help us analyze our web page flow, customize our services, content and advertising, measure promotional effectiveness and promote trust and safety.

You may delete and block all cookies from our Site and/or Services, but parts of the Site and/or Services will not work. We want to be open about our cookie use.

Even if you are only browsing the Site and/or Services, certain information (including computer and connection information, browser type and version, operating system and platform details, and the time of accessing the Site and/or Services) is automatically collected about you. This information will be collected every time you access the Site and/or Services and it will be used for the purposes outlined in this Privacy Policy.

You can reduce the information cookies collected from your device. An easy way of doing this is often to change the settings in your browser. If you do that you should know that (a) your use of the Site and/or Services may be adversely affected (and possibly entirely prevented), (b) your experience of this and other sites that use cookies to enhance or personalize your experience may be adversely affected. You can find out how to make these changes to your browser at this site: www.allaboutcookies.org/manage-cookies/. Unless you have adjusted your browser settings so that it will refuse cookies, our system will send cookies as soon as you visit our Site and/or access our Services. By using the Site and/or Services you consent to this, unless you change your browser settings.

Web beacons may be used to track the traffic patterns of users from one page to another in order to maximize web traffic flow. Our third-party advertising service providers may also use web beacons to recognize you when you visit the Site or access the Services and to help determine how you found the Site and/or Services. If you would like more information about this and to know your choices about not having this information used by these companies, please visit: the Digital Advertising Alliance's website, <http://www.aboutads.info/>, or the Network Advertising Initiative's website, http://networkadvertising.org/consumer/opt_out.asp.

How Do We Secure Your Personal Information?

We take reasonable steps to protect your Personal Information against unauthorized access, alteration, disclosure, misuse, or destruction. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. The safety and security of your Personal Information also depends on you. You are solely responsible for keeping your account details confidential, including any access credentials like passwords or mobile device PINs.

Your Rights Regarding Your Personal Information

You have certain rights with respect to the use of Personal Information on our Site and/or Services:

Changing or Deleting Your Personal Data. All users may review, update, correct or delete the Personal Information furnished by a user in their user account (including any imported contacts) by contacting us at privacy@nuid.io. If you completely delete all of your Personal Information, then your user account may become deactivated. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes.

Delete or Correct Your Content. You may access, correct, amend, or delete text, images, photos, audio, video, location data and all other forms of data or communication that you submit or transmit to, through, or in connection with the Site and/or Services ("**Your Content**") by accessing your user account (including any imported contacts). You control all of Your Content and any other User Content you upload. Content that you delete (including Content containing Personal Information) may be retained in archived or backup copies in order to

enable you to use certain features like revision history and base snapshots. For instructions on how to permanently delete Your Content from your account, please contact us at privacy@nuid.io. Please note that permanent deletion of Your Content through this process will impair or disable those features with respect to that Content.

Delete or Correct Personal Information. You may access, correct, amend, or delete Personal Information we have about you by logging into your account and navigating to your account page or by emailing us at privacy@nuid.io. For your protection, we may only share and update the Personal Information associated with the specific email address that you use to send us your request, and we may need to verify your identity before doing so. We will try to comply with such requests in a reasonably timely manner. If you wish to cancel your account, you may do so through your account page. If you do, personally identifiable information associated with your account will be deleted as soon as is reasonably practical or as required by applicable law. Please note that we may retain information that is otherwise deleted in anonymized and aggregated form, in archived or backup copies as required pursuant to records retention obligations, or otherwise as required by law.

Download or Access Personal Information. You can ask us for a copy of your Personal Information, as well as information about its processing, and can ask for a copy of your Personal Information (including in machine readable form) by emailing us at privacy@nuid.io.

Opting Out of Email Communications. If at any time you would like to unsubscribe from our email list, contact us at privacy@nuid.io.

Marketing Communications. We may use some of the information we collect for marketing purposes, including to send you promotional communications about new NuID features, products, events, or other opportunities. If you wish to stop receiving these communications or to opt out of use of your information for these purposes, please follow the opt-out instructions by clicking "Unsubscribe" (or similar opt-out language) in those communications. You can also contact us at privacy@nuid.io to opt out.

Site Communications. We will periodically send you free newsletters and e-mails that directly promote the use of our Site or Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly at privacy@nuid.io. Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Service or Privacy Policy.

Links to Third Party Websites

We may provide links to other websites. We have no control over these websites and they are subject to their own terms of use and privacy policies. As such, we do not endorse and are not responsible for the availability of, or for any content, advertising, products, or other materials on or available from, these third party websites.

By using the Site and Services, you agree that we will not be liable for any damage or loss caused by your use of or reliance on any content, advertising, products, or other materials on or available from these third party websites.

How We Respond to Do Not Track Signals

Your browser settings may allow you to automatically transmit a Do Not Track signal to websites and other online services you visit. We do not alter our practices when we receive a Do Not Track signal from a visitor's browser because we do not track our visitors to provide targeted advertising. To find out more about Do Not Track, please visit <http://www.allaboutdnt.com>.

Children Under 16

The Services are not directed to individuals who are under age of sixteen (16) and we do not solicit nor knowingly collect Personal Information from children under the age of sixteen (16). If you believe that we have unknowingly collected any Personal Information from someone under the age of sixteen (16), please contact us immediately at privacy@nuid.io and the information will be deleted.

A Note to Users Outside the United States

NuID is based in the United States. The Site and Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Your Personal Information may be collected, transferred to, stored and otherwise processed in any country where we have facilities or in which we engage service providers, and by using the Site and/or Services you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

Contact Us

If you have any questions about this Policy, your Personal Information, or the Site and/or Services, you can contact privacy@nuid.io or by emailing us at the below address:

NuID, Inc.
400 Jay St. Box 151
Brooklyn, NY 11201

Please contact us if you have any complaints or concerns with respect to your privacy. If you believe we are unable to assist you, you have the right to lodge a complaint with a supervisory authority in the relevant jurisdiction. However, we are committed to working with you to resolve any complaint or concern you may have with respect to your privacy.