

TEMPORAL PRIVACY POLICY

Posted: March 7, 2019

Effective: March 7, 2019

Updated: July 10, 2019

Thanks for using Temporal! Temporal is operated by RTrade Operations Ltd. (“**RTrade**”, “**us**” “**our**” and “**we**”), and we respect your privacy. This “**Privacy Policy**” summarizes what personal information we collect, and how we use and disclose this information when you use our website, software, or services (collectively, the “**Services**”).

This Privacy Policy applies to all users of our Services. These Services include, without limitation, our website, temporal.cloud (the “**Website**”), Temporal (our interface for interacting with the Interplanetary File System (“**IPFS**”)), and our storage solution powered by Temporal. By using our Services, or by creating an account on through our Services, you signify your consent to the terms of our Privacy Policy. If you do not agree with any terms of this Privacy Policy, please do not use our Services or submit any personal information to us.

We reserve the right to modify this Privacy Policy at any time. We will reflect any such modifications to this Privacy Policy on our Services. Your continued use of the Services after any such changes constitutes your acceptance of this Privacy Policy, as revised.

What Personal Information We Collect

“**Personal Information**” is information about an identifiable individual. We collect Personal Information when you voluntarily provide it through our Services, or when you provide it to us through other means. For example, we may collect Personal Information when you:

- contact us through email;
- create an account on the Services;
- use the Services, including the Website;
- upload content to Temporal;
- pin content to the IPFS using the Services;
- communicate with RTrade;

The Personal Information we collect will depend on the service you request. The Personal Information we collect might include:

- your email address;
- your IP address;
- your computer’s operating system;

- your web browser user agent;
- the data you upload or pin using the Services, to the extent that such data contains Personal Information;
- the content hash associated with data you upload or pin, to the extent that such data contains Personal Information;
- the keys you generate or retrieve using the Services;
- and any other Personal Information that you choose to submit to us.

If you purchase Credits on the Website, or subscribe for a paid tier of the Services, the information we collect may include the following:

- information provided by third party payment processors such as PayPal, Dash and Stripe;
- your Bitcoin, Ethereum, and RTCoin wallet addresses; and
- your banking or payment information as requested through our Services;

When you upload or pin data using the Services, we may collect information related to such uploaded or pinned data, such as your account information or your IP address. We do this to make the Services better for you (for example, so that it is easier for you to keep track of your data and share your data with others), to verify compliance with our Terms and Conditions of Use, to comply with legal requests, and to carry out and assist with investigations.

How RTrade Collects Information Through Technological Means

When you use our Services, we may collect information that is automatically sent to us by your web browser, such as your numerical IP address. We may also collect other information, such as the type of browser you use, which pages you view, and the files you request. The home page <https://temporal.cloud> uses google analytics, however <https://play.temporal.cloud> use Fathom to track page views, average time spent on the site, and how a user arrived at our website by off-site links. Fathom does not use personally identifiable information and is an open source alternative to google analytics that we self host within our data center. Please refer to the instructions provided by your browser or device if you want to learn more about what information it sends to Services you use, or how you may change or restrict this.

Using software that we developed in-house, (<https://github.com/RTradeLtd/tfarmer>) we track certain metrics such as daily active users, number of registered users, and number of user types (free, paid, etc.). None of this tracking information examines Personal Information. We use this information to improve our understanding of how users use our Services, to improve our Services, and attract more users. We may also use the information collected for our own research and development purposes.

For authentication we use JWTs instead of cookies.

How RTrade Uses and Discloses Personal Information

The information we collect from you may be used by us for the purposes for which it was collected, as provided in this Privacy Policy, or for other purposes that are disclosed to you and to which you consent. In addition to as otherwise described in this Privacy Policy, we may use and disclose information collected from you as follows:

- to deliver our Services to you;
- to register your account on the Services;
- to verify and authenticate your account information;
- to send you informational, or administrative communications;
- to transmit data uploaded to Temporal to our local nodes, or third-party nodes, for storage for the specified number of months or for an indefinite period;
- to pin data to our IPFS node;
- to share your data with persons who have the hash of the corresponding file and who download that file through the Services;
- to share data with other users through your selected gateway (either IPFS Gateway or RTrade Gateway);
- to verify compliance with our Terms of Use;
- to conduct investigations;
- to respond to inquiries and provide you with customer support;
- to increase the security and safety of our Services and users;
- to perform analytics on our Services;
- for any other purposes that are disclosed to you and to which you consent; and
- for any purpose required by law.

Our Services. We also combine, analyze, process, and store certain information we collect from you for the purposes of facilitating and improving our Services. We will **NOT** transfer information we collect from you to trusted third party service providers (“**Trusted Third-Parties**”) to assist us with carrying out any of these purposes. These Trusted Third-Parties will only be provided with your Personal Information to the extent necessary to perform services on our behalf in compliance with this Privacy Policy and only in accordance with our instructions. At all times, we will remain responsible for the Trusted Third-Parties access and use of your Personal Information.

We work with payment services providers to collect payments from users of our Services. As a result, we will share your Personal Information and other payment information with third party payment service providers, to the extent necessary to make such payment collections.

We index data uploaded by users through the Services in order to improve the operability of Lens, the search tool on the Website. This is an opt in functionality when uploading data or via the API endpoint which is free to use by anyone, whenever you upload any data with the web interface you can choose to automatically index it.

Additional Third-Party Services. From time to time, we may partner with various third-partners to provide you with additional services, such as additional storage space on third-party servers or nodes ("**Third-Party Services**"). If you choose to use a Third-Party Service, then you agree that we may disclose your Personal Information as necessary to facilitate your use of such Third-Party Service. Any such Personal Information will be subject to the privacy policies of such Third-Party Services provider.

Other Jurisdictions. The only information stored outside of Canada is that which is collected by stripe and may be stored or processed in jurisdictions outside of Canada. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions.

We also may transfer your Personal Information to our parent corporation, RTrade Technologies Ltd. (the "**Parent**"), as necessary to enable and assist our Parent with improvement and development of our Services. We may also transfer your Personal Information to our Parent if we amalgamate or merge with our Parent. Our Parent's use of your Personal Information will be subject to this Privacy Policy.

We also may use or disclose your Personal Information for any other purpose permitted by law or to which you consent.

Legal Process and Public Interest. We may disclose your Personal Information to third parties if we believe that such disclosure is necessary to: (i) comply with applicable laws, regulations, legal process, appropriate government request, or court orders; (ii) to assist in a criminal or civil investigation; (iii) to enforce or verify compliance with Temporal's Terms and Conditions of Use; (iv) to prevent crime; (v) to protect any person from bodily injury or death; (vi) to protect the safety of RTrade, our directors, officers, or employees, or the safety of our users; or (vii) to perform a task carried out in the public interest.

Discoverability on the IPFS

The Services allow you to upload or pin data (including Personal Information) to the IPFS. If you upload or pin data to the public IPFS network, it will be discoverable by any person that knows the corresponding content hash or searches for it through Lens. If you upload or pin data to a private IPFS network, it will be discoverable only by persons who are authorized to access the private network and who know the

content hash. You are responsible for understanding the extent to which the data you upload or pin to the IPFS using the Services is accessible by other persons, and you understand that failure to do so may result in your Personal Information being accessible by the public or at least certain members of the public.

How We Protect Personal Information

The security of your Personal Information is important to us. We protect your Personal Information by maintaining administrative, physical, and technological safeguards appropriate to the sensitivity of such Personal Information. Personal Information may only be accessed by persons within our organization who require such access to provide you with the services indicated above.

We retain Personal Information that we collect only as long as necessary for the purposes for which it was collected or to meet legal requirements. We destroy Personal Information when it is no longer needed.

Third Party Collection of Information

This Privacy Policy does not apply to applications, services, technologies, or websites that are owned by and/or operated by other parties. The relevant third party's terms of use, privacy policy, permissions, notices and choices should be reviewed by yourself regarding their collection, use, storage, and sharing practices since they may be different from ours.

Access and Rectification

You have a right to access to your Personal Information and to request a correction to it if you believe it is inaccurate. If you have submitted Personal Information and would like to have access to it, or if you would like to have it corrected, please contact us using the contact information provided below. However, if your Personal Information has been pinned to third-party nodes or is otherwise stored on third-party servers, we will be unable to assist you with rectifying such Personal Information as it will no longer be under our control.

Withdrawal of Consent

By contacting our Privacy Officer in writing at support@rtradetechnologies.com and following the instructions given by our Privacy Officer, you may withdraw consent to the collection, use, or disclosure of your information, subject to our legal or contractual obligations, reasonable notice, reasonable processing times, and technological restrictions.

How to Contact Us

If you have any questions regarding this Privacy Policy, or to access your information, please contact our Privacy Officer at support@rtradetechnologies.com