

# PRIVACY POLICY

**Last Updated: April 12, 2018; Effective: April 13, 2018.**

This privacy policy applies to [www.polluxnetwork.com](http://www.polluxnetwork.com) and the services associated with the site owned and operated by Fedrax Lda (“Pollux Network”, “We”, “Us”).

If you are accepting these Data Processing Terms on behalf of Customer, you warrant that: (a) you have full legal authority to bind Customer to these Data Processing Terms; (b) you have read and understand these Data Processing Terms; and (c) you agree, on behalf of Customer, to these Data Processing Terms. If you do not have the legal authority to bind Customer, please do not accept these Data Processing Terms.

Pursuant to our Terms and Conditions, this document describes how we treat personal information related to your use of the Service provided on our site; as well as information you supply us with when using the service. It also describes the choices available to you regarding our use of your personal information and how you can access and update this data.

If you have questions or complaints regarding our privacy policy, please contact us at [info@polluxnetwork.com](mailto:info@polluxnetwork.com)

## Data Collection

You can access some sections of our Service without having an Account, in which case only your IP address, country of origin and other non-personal information about your computer or device (such as web requests, browser type, browser language, referring URL, operating system and date and time of requests) will be recorded for log file information, aggregated traffic information and in the event that there is any misappropriation of information and/or content. If you have an Account, this information will also be recorded and may be associated with your Account.

Creating an Account is required for using many of the features of the Service. We require certain information about you at registration, including your login and password (which you generate), your name, company name and e-mail address. Other optional information may be added by you as well. Your IP address is also recorded automatically whenever you access the Service and may be associated with your Account. Any other information or content you provide us on the Service will be saved and associated with your account, including information such as bank account number, payment escrow service log-ins and National ID number that is used for fund transfers, (either to us or from us).

Usage Information. We may record information about your usage of the Service such as which products you view and purchase, the frequency and size of data transfers and other statistics. If you have registered and are logged in, we may associate that information with your Account.

Correspondence. We may keep a record of any correspondence between you and us, including Customer Service requests, e-mails and live chats.

Cookies. When you use the Service, we may send cookies and other related technologies to your computer to uniquely identify your browser session and provide you with a better experience on the Service (see our “Website Cookie Policy” for more information).

You authorize Pollux Network, directly or through third parties, to make any inquiries we consider necessary to validate your identity. This may include asking you for further information that will allow us to reasonably identify you, requiring you to take steps to confirm ownership of your email address or financial instruments or verifying your Information against third party databases or through other sources. We may also ask to see your government issued picture ID or any other identifying documents at any time. Pollux Network reserves the right to close, suspend, or limit access to your account in the event that we are unable to obtain or verify this information.

## **Data Usage**

We may use the information you give us to provide you with certain features and to create a personalized experience on the Service. We may also use that information to operate, maintain and improve the features and functionality of the Service.

We do not sell, trade, or otherwise transfer your personally identifiable information to outside parties. This does not include trusted third parties who assist us in operating our website, 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. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

We will retain your information for as long as your account is active or as needed to provide our services to you or as applicable according to the law. Please contact us if you wish to cancel your account or request that we no longer use your information to provide you with our services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **Updating your Personal Information**

Upon creating an account, you will be able to review and change your information through the Pollux Network platform. You may do this by logging in to your account and clicking on "Entity Details" via your username tab. From there, you can update individual information provided by you regarding your account. Alternatively, if you would like to review, correct, update, suppress, or delete Personally Identifiable Information that has been previously provided to us by you or you would like to request a copy of your Personally Identifiable Information held by us, you may contact us at [info@polluxnetwork.com](mailto:info@polluxnetwork.com). To reduce the occurrence of unauthorized access to your account information, Pollux Network strongly urges you to periodically change your password.

## **Security**

Pollux Network has security measures in place to protect and avoid the misuse and loss of the information under our control. We use industry standard efforts to safeguard the confidentiality of your personal identifiable information. Our technical experts at Pollux Network work hard to make sure that the use of our services is as secure as possible. However, no method of transmission over the Internet, or method of electronic storage, is entirely untraversable, reason why we cannot guarantee its absolute security. Any information or content you transmit to us is done at your own risk.

## **Third Party Assets**

Our Site and associated Services include links to other Web sites whose privacy practices may differ from those of Pollux Network. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Web site you visit.

## **Changes to this Privacy Policy**

We may change this policy as new services are added or old ones are changed. Such changes will be effective when a notice of the change is posted on the Site. Please check this Privacy Policy from time to time for updates by checking the date of the "Last Updated" at the top of this document. We may e-mail periodic reminders of our policies and terms & conditions, but you should check our website frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account. In the unlikely event that Pollux Network or substantially all of its assets are acquired, user information is to be one of the transferred assets.

## **Terms and Conditions**

We recommend that you visit our Terms and Conditions section establishing the use, disclaimers, and limitations of liability governing the use of our website [HERE](#)