



Trade 'Em Holdings, LLC

Privacy Policy

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Chapter 1 Overview

This privacy policy has been compiled to better serve all customers of Trade 'Em Holdings, LLC, hereafter referred to as "GEM WALLET", including those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online.

PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our technology.

Data Collection

When using our website or mobile applications, as appropriate, you may be asked to enter your name, email address, phone number, birth date or other details to enhance your experience, for both security and ease of use.

We collect information from you when you register on our website or mobile applications, fill out a form or enter information on our website and/or mobile applications.

Data Usage

We may use the information we collect from you when you register, make a purchase, sign up, respond to a survey or marketing communication, surf the website, or use certain other website or mobile application features in the following ways:

- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To improve our website in order to better serve you.
- To allow us to better service you in responding to your customer service requests.
- To administer a contest, promotion, survey or other website or mobile application feature.
- To quickly process your transactions.
- To ask for ratings and reviews of services or products
- To follow up with end-users after correspondence (live chat, email, or phone inquiries)
- To reward mobile end-users or allow our subscribing merchants to reward loyal customers.
- To monitor and report, as mandated by Anti-Money Laundering (AML) and/or Suspicious Activity (SAR).
- To search OFAC or other US government records for Specially Designated Nationals (SDN)
- To comply with all United States laws and regulations.

Data Protection

We do not use vulnerability scanning and/or scanning to PCI standards. An external PCI compliant payment gateway handles all payment transactions via Apple Pay, GPay, and our financial institution. We use regular Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a very limited number of persons who have special access permissions to such systems and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology. We implement a variety of security measures when a user places an order, enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

Cookies

Cookies are small files that a website or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the website's or service provider's systems to recognize your browser and capture and remember certain information.

For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current website activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about website traffic and website interaction so that we can offer better website and mobile app experiences and tools in the future.

We use cookies to understand and save user's preferences for future visits, and continually improve our services to our customers.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since the browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, it will not affect the user's experience.

Third Party Usage

We do not share, sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information.

We do not include or offer third-party products or services on our website. Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. <https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We have not enabled Google AdSense on our website or mobile applications, but we may do so in the future.

How does our website handle Do Not Track signals?

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Does our website allow third-party behavioral tracking?

It's also important to note that we do not allow third-party behavioral tracking.

Chapter 2 Disclaimers

California Online Privacy Protection Act

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. – See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

According to CalOPPA, we agree to the following:

Users can visit our website anonymously. We maintain a link to our privacy policy page on our website home page.

Our Privacy Policy link includes the word 'Privacy' and can easily be found on our homepage. You will be notified of any Privacy Policy changes on our [Privacy Policy Page](#). Customers may request to change their own personal information by:

- editing profile in “settings” on the GEM WALLET application
- emailing us: privacy@thegemapp.com
- calling us: 1-877-208-7233

WARNING: Requests to remove your fractional data and/or personal information from our website or mobile applications may result in your inability to use some or all of our services, and our disabling of your mobile application user account, including the inability to redeem values held in the user account wallet in our mobile applications.

COPPA (Children Online Privacy Protection Act)

When it comes to the collection of personal information from children under the age of 13 years old, the Children’s Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States’ consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children’s privacy and safety online.

We do not specifically market to anyone under the age of 18 years old.

Fair Information Practices

The Fair Information Practice Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

We will notify you via email as soon as possible.

- At the latest, within 7 business days

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

CAN SPAM Act (Controlling the Assault of Non-Solicited Pornography and Marketing)

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions.

To be in accordance with CAN-SPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email (GEM Wallet does not send subscription emails or marketing emails).

Customer Identification Program

Important Information You Need to Know about Opening a New Account.

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial

institutions to obtain, verify and record information that identifies each person who opens an account.

GEM WALLET requires the following types of information to comply with CIP regulations

- we collect identification information and check user IP addresses on our platform in order to thwart unlawful use of our technology.
- Username
- First Name
- Last Name
- Date of birth
- Zip Code (US)
- Mobile Phone Number
- Mobile Device IP Address
- Identification number: (only subject to GEM WALLET version 2.0 and above)

U.S. business entities: taxpayer identification number or employer identification number (only subject to GEM WALLET version 3.0 and above)

Non-U.S. citizen: GEM WALLET presently operates only in the United States, and only allows U.S. citizens to register on our systems.

If necessary, for U.S regulatory reporting requirements, you may also need to provide your driver's license or other government issued identifying documents.

A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, personally identifying information of all "beneficial owners" or the organization, certificate of good standing from state attorney general, a partnership agreement or a trust agreement.

U.S. Department of the Treasury, Securities and Exchange Commission, and FINRA rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives and risk tolerance (These objectives are only sought after if GEM is asked to report to a regulator; GEM does not require all of these measures in order to continue use of its technology platform).

What happens if I do not provide the information requested or my identity cannot be verified?

You (individuals, or your firm (business entities) may not be able to open an account or carry out transactions on GEM WALLET systems. If you or your firm has already opened an account, regulations may cause GEM WALLET to shut down your account.

If at any time you would like to unsubscribe from private data collection, you can email us at privacy@thegemapp.com or call 1-877-208-7233 and we will promptly begin the process of investigating your user activity. Once investigation is complete and it is deemed that your request is not malicious and/or nefarious in nature, your private data will be removed, in its entirety, from our database.

If GEM WALLET is legally acquired by another organization, the acquiring organization assumes full responsibility for the privacy of all GEM WALLET owned information, including the personal information of all customers of GEM WALLET. All personal information, and all information related to legal entities which are customers of GEM WALLET, would become the property of, and regulatory responsibility of, the acquiring organization, and be subject to the Privacy Policies of the acquiring organization.

Contacting Us:

If there are any questions regarding this privacy policy, you may contact us using the information below.

<http://thegemapp.com>

2308 West 5th Street, Plainview, TX 79072 USA

privacy@thegemapp.com

1-877-208-7233

Change History

This section contains the history of all changes made to this document and who approved the changes:

Version	Page(s)	Description of Change(s)	Approved By	Approval Date	Published Date
V.1	7	Initial Draft			