

# DAOwallet Privacy Policy

**Privacy Policy Effective Date: January 28, 2020**

## 1. Introduction and Scope

DWlab Crytech OÜ incorporated in Estonia with the registration address Harju maakond, Tallinn, Mustamäe linnaosa, Laki tn 30-23, 12915 (“DAOwallet”, “Company” “we,” “us,” “our”) takes the protection of Your Personal Data (“Personal Data”) very seriously when You visit, access our Website or use other products or services (collectively, the “Services”). This privacy policy (the “Notice”) addresses data subjects whose Personal Data we may collect via our website [www.daowallet.com](http://www.daowallet.com) (“Website”). This Notice explains what Personal Data we collect about You, the ways and the purposes for which such data is gathered and the rights You may have with respect to Your Personal Data.

## 2. Categories of Personal Data

We may process the following categories of Personal Data about You:

- Wallet Addresses,
- email address,
- survey responses,
- name, surname, place of residence, income sources,
- information about you from third-party sources,
- any other information You choose to provide.

## 3. Collecting Information

When You use our Services, we collect information from You. We may collect:

- **Log Information and e-mail.** Information that You provide to us when registering with our Services, including e-mail, access times, pages views, IP address, and the website navigation paths.
- **Wallet addresses.** When You use DAOwallet we may link Your e-mail to wallet addresses access via DAOwallet.
- **Device information:** We collect information about the computer or mobile device You use to access our Services, including the hardware model, operating system and version, Your web browser, and device identifiers (including a network ID used to communicate with other nodes on the platform).
- **Usage information.** If You use our Website, we will collect information contained in or relating to any communication that You send to us or send through our Website (including shard size, number of shards and frequency of access), and metadata associated with the communication.

- **Information collected by cookies and other tracking technologies via our Services.** A “cookie” is a small file stored on Your device that contains information about Your computer. We use cookies on Website to collect information about Your visit and to allow You to navigate from page to page without having to re-login each time, count visits, and see which areas and features of our website are popular. Cookies are small text files that are usually stored on a computer's hard drive by websites that You visit. With this knowledge, we can improve the quality of Your experience with our Services by recognizing and delivering more of the most desired features and information, as well as by resolving access difficulties. Web beacons (or pixel tags) are electronic images that may be used in our web Services or emails to help deliver cookies, count website visits, understand usage and determine the effectiveness of email marketing campaigns. For more information, please visit <https://www.aboutcookies.org/>.
- **Information collected by our support.** When You contact our support we may collect information provided by You.
- **Information collected during KYC and AML checks.** full name, address and postcode, date of birth, PEPs and sanctions related data, income sources, etc.
- **Information we collect from other sources.** We may also receive information about You from other sources, such as when logging into Your Website account by using Your account credentials for a separate third-party service. We will receive information from that service as indicated in the relevant third party's authorization screen.

#### 4. **Controllership**

In the context of this Notice, we act as a data controller for Personal Data we process about You.

#### 5. **Basis of Processing**

Within the scope of this Notice, we may rely on one or more of the following lawful grounds for the processing of Your Personal Data:

- Your consent;
- meeting contractual obligations or taking steps to enter into a contract;
- any other ground, as required or permitted by law in the specific respective context.

#### 6. **Purpose of Processing**

Personal Data collected via our Website is processed for the following purposes:

- Administer our Services;
- Develop new Services

- Personalize our Website for You;
- Send You technical notices and support and administrative messages;
- Communicate with You about Services, promotions, events and other news and information we think will be of interest to You;
- Monitor and analyze trends, usage and activities in connection with our Services;
- Provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of Company and others;
- Link or combine information we collect from or about You; and
- Verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service).

## **7. Data Retention**

In accordance with applicable laws and as needed to provide Services to our Users, we may hold Your Personal Data. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain Your Personal Data so long as Your account is active. Moreover, Your information may be held beyond the period mentioned above until it is indispensable for us to have relevant information to respond to any issues that may arise later.

## **8. Sharing Personal Data with Third Parties**

We may share Your Personal Information

- If You've consented or otherwise given us permission to share;
- With service providers that perform work for us (such as hosting providers, identity verification, support, payment, and email service providers);
- When You go through KYC and AML checks;
- When You use interactive areas of our Services, like our blog or other online forums, certain information You choose to share may be displayed publicly, such as Your username, actions You take and any content You post;
- When You use third-party exchanges Your wallet addresses will be shared with a third-party exchange.
- Our use of cookies and other technologies may allow third parties to collect information about Your browsing activities over time and across different websites following Your use of our Services We may

allow others to provide analytics services on our behalf in connection with our Services. These entities may use cookies and other technologies to collect information about Your use of the Services and other websites and apps, including Your IP address, web browser, pages views, app performance, time spent on pages and links clicked. This information may be used by the Company and others to, among other things, analyze and track data, determine the popularity of certain content and better understand Your online activity.

## **9. Other Disclosure of Your Personal Data**

We may also disclose Your Personal Data:

- to the extent required by law or if we have a good-faith belief that such disclosure is necessary in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, or private parties, including but not limited to: in response to subpoenas, search warrants, or court orders. The Company is based in the Republic of Estonia and the information we collect is governed by the Estonian law. By accessing or using our Services or otherwise providing information to us, You consent to the processing and transfer of information in and to Estonia and other countries, where You may not have the same rights as You do under local law. Where this is the case, we will take appropriate measures to protect information about You in accordance with this Privacy Policy;
- if we sell or transfer all or a portion of our company's business interests, assets, or both, or in connection with a corporate merger, consolidation, restructuring, or other company change; or
- to our subsidiaries or affiliates only if necessary for business and operational purposes as described in the section above.

We reserve the right to use, transfer, sell and share aggregated, anonymous data, which does not include any Personal Data, about the users of our Website as a group for any legal business purpose, such as analyzing usage trends and seeking compatible advertisers, sponsors, clients, and customers.

If we must disclose Your Personal Data in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, we may not be able to ensure that such recipients of Your Personal Data will maintain the privacy or security of Your Personal Data.

## 10. Your Rights Regarding Your Personal Information DAOWallet Collects and Processes

You have the following rights:

- **The right to know what Personal Information DAOWallet processes and get details of such processing.** That means that You have the right to ask DAOWallet provide You with the confirmation as to whether or not Your Personal Data is being processed by DAOWallet, as well as obtain the full information on the terms of such processing, i.e. purposes of collecting and processing, period of processing, third parties that have access to information. You also have the right to obtain Your Personal Data in a structured, commonly used and machine-readable format in order to be able to transmit it to the other controller of data.
- **The right to request DAOWallet to rectify Your Personal Data.** This means You have the right to ask that all inaccuracies in Your Personal Data be corrected. You can also complete the Personal Data if You feel there is a need to do so.
- **The right to request DAOWallet to erase Personal Information.** You can request DAOWallet to erase such data if its processing is no longer necessary in relation to the purposes for which it was collected as well as if there are no legal grounds for the processing. In most cases, DAOWallet will erase it unless otherwise will be required by the applicable legislation.

The Personal Data DAOWallet processes can be divided into two categories which are crucial in respect of Your right to request the erasure of Your data. The first category comprises information that is not stored in blockchains. This information includes all the Personal Data specified in Section Categories of Personal Data of this Privacy Policy. The other category of information which is processed and can be associated with You is the data that is stored in blockchains. This refers to Your wallet address and history of Your wallet transactions for example. The second category of data is inextricably connected with the first category of Your data. Furthermore, the second category of data is stored in blockchain permanently and there are no technical means to delete it or it is almost impossible to do so.

Hence, there are two aspects of Your right to erasure:

- 1) The second category of data stored in blockchains remains personal identifiable information only as long as it can be related to the first category of data processed by DAOWallet. Once the first category

of data is erased upon Your request the second category will no longer be determined as personal.

- 2) The request to erase the second category of data alone will require the erasure of the first category of data thus making the second category of data to be no longer classified as Personal Data as there will be no other data available in accumulation to identify a user.

Please note that the erasure of data that falls within the first category will inevitably cause Your inability to use DAOWallet Service.

- **The right to request DAOWallet to restrict the processing of Your Personal Data.** You have the right to request the restriction of processing of Your Personal Data in cases provided by the applicable law. For instance, if You want to verify whether the data processed by DAOWallet is accurate, the processing of Your data may be restricted for the period of time DAOWallet will require to verify Your Personal Data at Your request.
- **The right to withdraw consent.** You can withdraw Your consent to the collection and processing of Your Personal Data by DAOWallet at any time, without affecting the lawfulness of processing based on consent before its withdrawal. After we at DAOWallet receive such withdrawal request from You, we will process it in a timely manner and no longer process Your Personal Data unless the obligation to proceed with processing is set by the applicable law. The phrase “in a timely manner” is deciphered below.

Here You have to know that there are different purposes for which Your data is being processed. You can withdraw from one of them not affecting the other. For example, if You want to withdraw consent to the processing of Your Personal Data for sending You technical information about our Services, DAOWallet may still process Your Personal Data if You want to retain Your account and access to DAOWallet in case You specify this in Your request for withdrawal.

However, if You withdraw Your consent to the processing of Your Personal Data for the purposes of primary DAOWallet Services, DAOWallet will not be able to provide You Services.

If You will face any issues regarding the processing of Your Personal Data or have questions on the same matter, please inform DAOWallet and we will take all reasonable efforts to resolve the issue. **If You have any such issues, contact**

**support@daowallet.com.** You can also address any of Your complaints to the data protection controlling bodies.

### **11. Data Integrity & Security**

We use relevant electronic and procedural safeguards to protect the privacy of the information You provide to Company from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Please note that we are not liable for the security of any data You are transmitting over the Internet, or third- party content.

### **12. DLT Solutions Disclaimer**

Most DLT Solutions are designed in a way that all data, including transactions and addresses, are publicly visible. When you use DAOWallet and other our Services you interact with DLT Solutions. As most DLT Solutions are decentralized, they cannot be fully controlled by anyone, including DAOWallet. By accepting this Notice you warrant that (1) you understand how different DLT Solutions affect your privacy, (2) you agree that your data is immutable may be visible to all DLT Solutions participants.

### **13. Changes to this Notice**

If we make any material change to this Notice, we will post the revised Notice to this web page and update the "Effective Date" above to reflect the date on which the new Notice became effective. We encourage You to periodically check this page for the latest information on our Privacy Policy.

DAOWallet may assign our rights and obligations under this Notice without Your written consent.

### **14. Contact Us**

If You have any questions about this Notice or our processing of Your Personal Data, please write to us by email at please contact us at support@daowallet.com.

It may take up to four weeks for us to reply.

If You are a resident of the European Union, You may have the right to lodge a complaint with a data protection regulator in one or more of the EU member states.