

## **DATAWISP PRIVACY POLICY**

**Effective Date:** 2022-11-01

Welcome to Datawisp! This Privacy Policy describes how Datawisp, Inc. (“Datawisp”) collects, uses, and shares your information when you visit datawisp.io or use our platform (collectively, the “**Platform**”).

We know your data is valuable. That’s why this Privacy Policy applies only to the information we collect from you when you use our Platform. This Privacy Policy does not apply to any “content” or “data” you or your organization process through our Platform, which we keep strictly confidential pursuant to our [Terms and Conditions](#).

### **1. What Information Do We Collect About You When You Use Our Sites & Platform?**

Information we collect directly from you	We collect information directly from you when you use our Platform, including: <ul style="list-style-type: none"><li>● <b>Contact Information</b>, in the form of your business email address and other business contact information you provide.</li><li>● <b>User Information</b>, username and password.</li></ul>
Information we collect automatically	We may collect certain information about you automatically when you access and use the Platform, including: <ul style="list-style-type: none"><li>● <b>Platform Usage Information</b>, including information about features you use, pages you visit, services you use, the time of day you browse, and your referring and exiting pages.</li><li>● <b>Device Information</b>, including information data about the type of device or browser you use, your device’s operating software, your internet service provider, your device’s regional and language settings, and device identifiers such as IP address.</li></ul>
Information we collect from third parties	We may receive certain information from third-party sources, including: <ul style="list-style-type: none"><li>● <b>Service providers</b>, such as Google and Apple who may send us certain data related to authenticating your log-in to the Platform.</li><li>● <b>Publicly-Available Sources</b>, including data posted on the applicable blockchain that is utilized by the Platform and other sources that may be available in the public domain.</li></ul>

### **2. How Do We Use Your Information?**

We use your information to:

- provide the Platform to you and all related services;
- improve our Platform and to customize your experience with the Platform;

- maintain your account;
- process payments related to your use of the Platform;
- verify transactions on the blockchain related to use of the Platform;
- use for internal business purposes;
- monitor and analyze trends, usage and activities;
- conduct research, including focus groups and surveys;
- use for customer service, security, to detect fraud or illegal activities, respond to trust and safety issues that may arise, and for archival and backup purposes in connection with the provision of the Platform;
- fulfill any obligations related to our smart contract, agreements and the Terms of Use; and
- to communicate with you.

Notwithstanding the above, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we use information about you, please see the “Your Rights and Choices” section below.

### **3. How We Share Your Information**

- **Third Party Service Providers Performing Services on Our Behalf.** We share your information with our service providers to perform the functions for which we engage them. For example, we may use third parties to host the Platform or assist us in providing functionality of the Platform.
- **For Legal Purposes.** We may share your information as needed to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We may also disclose your information in our sole discretion to respond to a subpoena, regulation, binding order of a data protection agency or court, legal process, governmental request or any other legal or regulatory process. We may also share your information as required to pursue available remedies or limit damages we may sustain.
- **Blockchain Platform.** Our Platform utilizes blockchain technology. When you engage in a transaction on the Platform that is recorded on the blockchain, certain information related to that transaction will be published on the blockchain and may be accessible to third parties not controlled by Datawisp. Transactions recorded on the blockchain permanently recorded across a wide networks of computer systems is generally incapable of deletion. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of personal information, especially when blockchain data is combined with other data.

- **Merger, Sale, or Other Asset Transfers.** We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the provisions of this Privacy Policy in effect at the time the applicable information was collected.
- **Consent.** We may also disclose your information with your permission.

Datawisp does not share your information with third parties for those third parties’ direct marketing purposes.

**4. Your Rights and Choices**

**4.1 Account Information**

You may access, update, or remove certain information that you have provided to us through your account by visiting your account settings or sending an email to the email address set out in the “Contact Us” section below. We may require additional information from you to allow us to confirm your identity. Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

**4.2 Communications**

**E-mails.** You can opt-out of receiving promotional emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link, or emailing us at the email address set out in the “Contact Us” section below with the word UNSUBSCRIBE in the subject field of the email. Please note that you cannot opt-out of non-promotional emails, such as those about your account, transactions, servicing, or Datawisp’s ongoing business relations.

**5. How We Secure Your Information**

Datawisp uses reasonable security measures designed to prevent unauthorized intrusion to the Platform and the alteration, acquisition or misuse of your information.

**6. Links to External Websites**

Our Platform may contain links to third-party websites. Any access to and use of such third-party websites is not governed by this Privacy Policy, but is instead governed by the privacy policies of those third-party websites, and we are not responsible for the information practices of such third-party websites.

**7. European Economic Area, UK, and Switzerland**

<b>Controller</b>	Datawisp, Inc., 14 Alicia court, Hempstead, NY 11550
<b>Processing</b>	We process your personal data on one or more of the following legal bases:

	<ul style="list-style-type: none"> <li>● As necessary to enter into a contract with you or a legal entity you represent, to perform our contractual obligations, to provide our Platform, to respond to requests from you, or to provide customer support;</li> <li>● Where we have a legitimate interest, as described herein;</li> <li>● As necessary to comply with relevant law and legal obligations, including to respond to lawful requests and orders; or</li> <li>● With your consent.</li> </ul>
<b>Rights</b>	<p>Subject to applicable law, you have the right to:</p> <ul style="list-style-type: none"> <li>● ask whether we hold personal information about you and request copies of such personal information and information about how it is processed;</li> <li>● request that inaccurate personal information is corrected;</li> <li>● request deletion of personal information that is no longer necessary for the purposes underlying the processing, processed based on withdrawn consent, or processed in non-compliance with applicable legal requirements;</li> <li>● request us to restrict the processing of personal information where the processing is inappropriate;</li> <li>● object to the processing of personal information; and</li> <li>● request portability of personal information that you have provided to us (which does not include information derived from the collected information), where the processing of such personal information is based on consent or a contract with you and is carried out by automated means.</li> </ul>
<b>Complaints</b>	You can lodge a complaint with your local data protection authority, or submit a request to us via our contact link below.
<b>Transfers outside of the EEA</b>	When we transfer your personal data outside the EEA we do so in accordance with the terms of this Privacy Policy and applicable law.

## **8. Do Not Track**

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. We do not monitor or take action with respect to “Do Not Track” signals. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

## **9. Children**

We do not knowingly collect or maintain information from any person under the age of thirteen. No parts of our Platform is directed to or designed to attract anyone under the age of thirteen.

## **10. Questions / Contact Us**

If you have any questions regarding this Privacy Policy, please contact us at [privacy@datawisp.io](mailto:privacy@datawisp.io).

#### **11. Notification of Changes**

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted unless otherwise noted.