

# Privacy Policy

Effective Date: 2021-01-20

This privacy policy ("Privacy Policy") governs data collection and usage of the services, software, platform, and websites provided by Alexsyo OÜ ("Alexsyo OÜ", "we," "us," or "our") and any of its affiliates (collectively, the "Services"). This Privacy Policy is intended to meet requirements globally, including those in North America, Europe, APAC, and other jurisdictions. By using the Services, you consent to the data practices described in this Privacy Policy. Please read this document carefully and ensure that you understand it. If you do not agree to any part of this Privacy Policy, then you should stop accessing the Services immediately. Please read this carefully as this Privacy Policy is legally binding when you use the Services.

If you use the Services, Alexsyo OÜ may request certain personally-identifiable information ("PII"). This may include contact information such as your email address. In addition, Alexsyo OÜ may collect personal information regarding other accounts you choose to link with Alexsyo OÜ or the Services (e.g., Metamask, Google, etc.).

If you contact Alexsyo OÜ in person, by phone, email, instant messaging, live chat, or by some other means (either through the Services or through a third-party service), Alexsyo OÜ may keep a record of your contact information and correspondence for later reference.

Alexsyo OÜ retains the personal information it receives as described in this Privacy Policy for as long as you use the Services or as necessary to fulfill the purpose(s) for which it was collected, provide the Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce Alexsyo OÜ agreements, and comply with applicable laws.

## Your rights

### Right to access

As a data subject you have the right to obtain from us free information about your personal data processed at any time and a copy of this information. Furthermore, you will have access to the following information: the purposes of the processing; the categories of personal data concerned; where possible, the envisaged period for which the personal data will be processed, or, if not possible, the criteria used to determine that period; the existence of the right to request from us rectification or erasure of personal data, or restriction of processing of personal data concerning you, or to object to such processing; the existence of the right to lodge a complaint

with a supervisory authority; where the personal data are not collected directly from you, any available information as to their source; and the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for you.

## **Right to rectification**

You have the right to obtain from us, without undue delay, the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

## **Right to be forgotten**

You have the right to obtain from us the erasure of personal data concerning you as soon as possible, and we shall have the obligation to erase personal data without undue delay where required by the law, including when:

- the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- there is no longer a legal ground for the processing;
- you object to the processing and there are no overriding legitimate grounds for the processing;
- the personal data has been unlawfully processed;
- the personal data must be erased for compliance with a legal obligation in accordance with the applicable law to which we are subject.

## **Right to restriction of processing**

You have the right to obtain from Alexsyo OÜ restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;

- the processing is unlawful and you oppose the erasure of the personal data and requests instead the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; and/or you have objected to processing pursuant to applicable laws.

## **Right to object**

You have the right to object, on grounds relating to your particular situation, at any time, to the processing of personal data concerning you. We shall no longer process the personal data in the event of the objection, unless we can demonstrate reasonable grounds for the processing, which override the interests, rights and freedoms of you, or for the establishment, exercise or defense of legal claims.

## **Right to withdraw data protection consent**

You have the right to withdraw your consent to the processing of your personal data at any time.

## **International transfers**

We are entitled to transfer your personal data to third parties abroad for the purposes of data processing.

As personal data processors, they are obliged to protect data privacy to the same extent as we ourselves. We choose the processors carefully to ensure compliance with applicable laws.

## **Data security**

We use appropriate technical and organizational security measures to protect your personal data. Our security measures are continuously improved in line with technical developments.

## **Duration of data processing**

We will process your personal data only for the period necessary to achieve the purpose of the processing, or as required by applicable laws. After the period the personal data will be deleted.

## **Other Notices**

— Users can explore the Services anonymously; — Once this Privacy Policy is created, Alexsyo OÜ will add a link to it on its home page, or at a minimum, on the first significant page after entering the Alexsyo OÜ website central to the Services; — The Alexsyo OÜ Privacy Policy link includes the word 'Privacy', and can be easily be found on the page(s) specified above; and — Users will be notified of any privacy policy changes on the Alexsyo OÜ Privacy Policy page.

Users are able to change their personal information:

— By emailing Alexsyo OÜ. — By chatting with Alexsyo OÜ representatives.

## **Children**

This site and the Services are not targeted towards children, and Alexsyo OÜ does not knowingly collect PII from children under the age of thirteen (13). If you become aware that a child has provided Alexsyo OÜ or its affiliates with PII, please contact Alexsyo OÜ as set forth in this Privacy Policy. If you are a parent or legal guardian of a minor child, Alexsyo OÜ will treat any information that you provide Alexsyo OÜ while using the Services on behalf of your minor child as PII as otherwise provided in this Privacy Policy.

If you have questions concerning Alexsyo OÜ information practices with respect to children, or if you learn that a child under the age of thirteen (13) has used the Services or provided Alexsyo OÜ with personal information, please email the Company at its public contact address.

## **We Reserve the Right to Update and Revise This Privacy Policy at Any Time**

We occasionally review this Privacy Policy to make sure it complies with applicable laws and conforms to changes in the Services. We may need to update this Privacy Policy, and we reserve the right to do so at any time. If we make a change to this Privacy Policy that, at our sole discretion, is material, we will provide you with additional notice. By continuing to use the Services after Privacy Policy changes go

into effect, you agree to be bound by the revised policy. We strongly encourage you to review the Privacy Policy whenever you access or use the Services or otherwise interact with us to stay informed about our information practices and your privacy rights and choices.