

# Privacy Policy

The protection of personal data of individuals is a top priority for us. This Privacy Notice helps you to make informed decisions about your relationship with BIOTRON FOUNDATION, občianske združenie, with its registered seat at Staré Grunty 18, 841 04 Bratislava – m. č. Karlova Ves, the Slovak Republic, the company ID: 51191857, registered with the Register of Civil Associations of the Ministry of Interior of the Slovak Republic (“Biotron”, “we” or “us”), so please read it carefully.

It is crucial that you understand how and why we collect, use and share information about you (“Information” or “personal data”) when you access and use services operated by us (“the Services”) or when you otherwise interact with us in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (“GDPR”).

We have taken appropriate technical and organisational measures to protect the personal data retained by us against unauthorized access and misuse. Our security procedures are revised regularly and adapted to reflect technological progress.

## 1. INFORMATION ABOUT YOU WE COLLECT

1. We collect information you directly provide to us when you use the Services. This includes:
  - E-mail address – Within the website registration process we collect e-mail address of Data Subjects in order to be able to communicate with registered users about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to users.
  - Information necessary in order to provide our Services - this includes e-mail address, Ethereum address, other Blockchain address where applicable and other information provided by you through email (such as your first name and surname might be disclosed, even though not directly requested by us).
  - Other Information – you may choose to provide other information directly to us, e.g. with respect to the promotions and related services, your requests and notifications, customer support or other communication with us, such as:
    - Device and application information, such as the device name, device identification code (IMEI, ESN, MEID, and SN), device activation time, hardware model, OS version, application version, software identification code, and device and application settings (such as region, language, time zone, and font size).
    - Mobile network information, such as the public land mobile network (PLMN) provider ID and Internet Protocol (IP) address.
    - Log information. When you use Services we will automatically collect and log some information, such as the time of access, access count, IP address, and information about incidents (such as errors, crashes, restarts, and upgrades).

- Location information. we will collect, use, and process the approximate or precise location of your device. Location information can be obtained based on the GPS, WLAN, and service provider network ID. You are free to choose if you want to enable gathering of Location information. Please note that simply by installation of the applications on your devices, Location information is not gathered from you. Location information are gathered solely on your decision to enable collection of Location information in the settings menu of the installed application, what is rewarded by remuneration. In the same settings menu of the installed application, you can disable the location permissions to reject sharing your location information.

We do not intend to process special categories of data, such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or a natural person's sex life or sexual orientation, unless the individual has given explicit consent to the processing of such data.

## **2. HOW WE USE INFORMATION ABOUT YOU**

1. We use information about you for the following purposes:

- to provide the Data Subject with the Services (legal basis according to the Article 6 (1) b) GDPR);
- to fulfil our obligations arising from the law (legal basis according to the Article 6 (1) c) GDPR);

2. We process your information for our legitimate interests (legal basis according to the Article 6 (1) f) GDPR) and those of third parties while applying appropriate safeguards that protect your privacy. This means that we process your information for things like notably:

- to identify you as an individual or entity or in some cases perform our know your client procedures and checks;
- to maintain and improve our Services;
- to measure performance;
- to communicate with you about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to you;
- to prevent or detect fraud;
- to protect against harm to the rights and freedoms of the physical persons, property or safety of Data Subjects, as required or permitted by law;
- to send you OS or application updates and installation notifications;
- to synchronise, share, and store the data you have provided;
- to process pursuant to laws and regulations, e.g. tax, authority requests;
- for the establishment, exercise or defence of legal claims.
- as stated otherwise in this Privacy Notice.

3. Our legitimate interest lies in conducting and managing our business and other abovementioned purposes. We consider and balance any potential (positive and negative) impact on you and your rights before we process your personal data for our legitimate interests to make sure that our

interests are compelling enough. We will not use your personal data for activities where our interests will be overridden by the impact on you. We conducted and documented an internal legitimate interest assessment that determined: (i) our legitimate interests, (ii) that the processing is necessary for our legitimate interests; and (iii) that your interests and fundamental rights do not override those interests. You can obtain further information about how we assess our legitimate interests against any potential impact on you by contacting us at support(at)biotron.io.

4. We will process the information that we collect about you during the term, which is necessary for the purposes for which this information is processed (i.e. within the period, when your user account is active, within the period required by the law or period necessary for the establishment, exercise or defence of legal claims, etc.). The provision of above specified personal data is voluntary, nevertheless in case you do not provide such information to us, we may not be able to provide you with our Services.

### **3. HOW WE SHARE INFORMATION**

1. In certain specific cases we might use our business partners to perform certain services for us, however, generally these are standardized services and we bind our business partners with protection of your personal information.
2. We might also share your information with the following categories of recipients such as:
  - our hosting provider;
  - owners of media properties and other companies that send targeted advertising to mobile consumers;
  - data centres provided by third parties.
3. We will not share, sell, or give away any of our users' personal information to third parties, unless one of the following circumstances applies:
  - We may share information (and will attempt to provide you with prior notice, to the extent legally permissible) in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process or governmental request;
  - We may share information in response to an emergency if we believe it's necessary to prevent imminent and serious bodily harm to a person;
  - We may share information if we believe your actions are inconsistent with our agreements, or our other policies, or to protect the rights, property, and safety of ourselves and others;
  - We may share information between and among us, and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
  - We may share information with your consent or at your direction.
4. We may share aggregated or anonymized information, which cannot reasonably be used to identify you.

### **4. TRANSFER TO OTHER COUNTRIES**

1. Personal data of our users will be transferred, processed and stored on servers located in EU (Germany). We may subcontract processing to, or share your information with, third parties located in countries other than your home country. In order for us to be able to provide you with the use of Services, you acknowledge that your personal data may be processed, transferred and stored in other countries, where you may not have the same rights as you do under your local law. Regardless of where your information is processed, we apply the same protections described in this policy.
2. In addition, personal data of users may be transferred to countries, which based on the EU Commission decision do not ensure an adequate level of protection (“third countries”). Hereby you specifically acknowledge that your personal data may be transferred to third countries. In such a case, we will take necessary effort to make use of solutions that will provide you with enforceable and effective rights as regards the processing of your data once those have been transferred, so that you may continue to benefit from fundamental rights and respective safeguards.

## **5. SECURITY**

1. We take appropriate technical and organisational measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction.
2. We take reasonable and feasible measures to ensure that the personal data collected is minimal and relevant to what is necessary in relation to the purposes for which they are processed. We retain your personal data for no longer than is necessary for the purposes stated in this Privacy Notice, unless extending the retention period is required or permitted by law.
3. We are committed to protecting your personal data. Nevertheless, no security measure is perfect and no product, service, website, data transfer, computing system, or network connection is absolutely secure.

## **6. AGE LIMIT**

1. The Services are not intended or directed at individuals under the age of 21. We do not knowingly collect personal information from individuals under 21 (“the Age Limit”). If you are under the Age Limit, please do not use the Services and do not provide any personal information to us.

## **7. COOKIES**

1. An HTTP cookie (also called web cookie, Internet cookie, browser cookie or simply a cookie) is a small piece of data sent from a website and is stored in the user’s web browser while the user is browsing.
2. We set third party cookies on behalf of companies that provide space for the display of advertising within websites.

3. We may use cookies to establish a relationship between devices or data pertaining to the same user. If we already have information about a device's user, we may link the information stored in cookies to the device's Ad ID.
4. We use this information to facilitate the delivery of you targeted advertisements.

## **8. YOUR RIGHTS**

1. You as a data subject ("the Data Subject" or "user") have the right to request the access and rectification or erasure of personal data or restriction of processing or to object to processing as well as the right to data portability. Further, you have a right to lodge a complaint with a respective supervisory authority (Office for personal data protection of the Slovak Republic, Hranicna 12, 820 07 Bratislava, Slovak Republic; [statny.dozor\(at\)pdp.gov.sk](mailto:statny.dozor(at)pdp.gov.sk)).
2. The right to rectification is the right of the Data Subject to obtain without undue delay the rectification of inaccurate personal data concerning him or her.
3. The right to erasure is the right of the Data Subject to obtain the erasure of personal data concerning him or her without undue delay, where:
  - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - the user withdraws consent on which the processing is based and where there is no other legal ground for the processing;
  - the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing;
  - the personal data have been unlawfully processed;
  - the personal data have to be erased for compliance with a legal obligation in the law;
  - the personal data have been collected in relation to the offer of information society services.

The exercise of the right to erasure is subject to respective limitations set by the applicable law.

4. The Data Subject has the right to restriction of processing, when:
  - the accuracy of the personal data is contested by the Data Subject, for a period enabling us to verify the accuracy of the personal data;
  - the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - the personal data are no longer needed for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims;
  - the Data Subject has objected to processing, pending the verification whether the legitimate grounds of us override those of the Data Subject.
5. The Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to us, and have the right to transmit those data to another controller, where technically feasible, where the processing is based on consent pursuant or on a contract and the processing is carried out by automated means.

6. The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on Article 6 (1) e) and f) GDPR, including profiling based on those provisions.
7. Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
8. Subject to the respective statutory limitations set by the applicable law, the Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

## **9. CHANGES TO THE PRIVACY NOTICE**

1. We may change this Privacy Notice from time to time. When we make material changes, we'll provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the Services or by sending you an email. We encourage you to review the Privacy Notice whenever you access or use the Services or otherwise interact with us to help protect your privacy. If you continue to use the Services after Privacy Notice changes go into effect, you consent to the revised notice.

## **10. CONTACT US**

1. Questions or comments about this Privacy Notice may be directed to support(at)biotron.io. Our external Data Protection Officer is Milan Gajdos (dpo(at)biotron.io, 00421 940 622 569).

Last updated: 7<sup>th</sup> June 2018