

Privacy Policy

Last updated: 28 September 2021

1. Introduction and Scope

DAOGroup (“DAOGroup”, “we,” “us,” “our”) takes the protection of your personal information (“Personal Data”) very seriously when You visit, access our Websites, or use other products or services (collectively, the “Services”). This privacy policy (the “Privacy Policy”) addresses data subjects whose Personal Data we may collect via our websites at: <https://daobet.org>; <https://dao.group/>; <https://mainnet.daovalidator.com/>, and any other websites and services of DAOGroup (“Websites”).

This Privacy Policy describes 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. This Privacy Policy applies to all of your interactions with us via the Websites, and your interactions with us in connection therewith.

One of our main priorities is the privacy of our users. This Privacy Policy applies only to our online activities and is valid for participants who are visitors to our Websites or users of our Services with regards to the information that they shared.

IF YOU ARE UNWILLING TO AGREE TO THIS PRIVACY POLICY, OR YOU DO NOT HAVE THE RIGHT, POWER, AND AUTHORITY TO ACT ON BEHALF OF AND BIND THE BUSINESS, ORGANIZATION, OR OTHER ENTITY YOU REPRESENT, DO NOT ACCESS OR OTHERWISE USE THE WEBSITES OR THE SERVICES.

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.

To the maximum extent possible, we try to collect as minimum as possible Personal Data from you. Personal Data we collect:

- **Contact information:** Such as email address;
- **Any other information:** You choose to provide to us, for example, when You contact our support;
- **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 Websites, we will collect information contained in or relating to any communication that You send to us or send through our Websites (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 the Websites 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 Websites 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/>.

In most cases, we will collect Your Personal Data directly from You. In other cases, we may use third-party companies such as KYC and AML providers to obtain Your Personal Data for the purposes set in this Privacy Policy.

Please also note that we may use public Ethereum addresses to identify a user’s journey through our product. We group and analyse these user journeys collectively in order to improve our product user experience. We do not use this data for any purpose at an individual user level.

3. Controllership

In the context of this Privacy Policy, we act as a data controller for Personal Data we process about You. This means that we determine the why and how Your Personal Data is processed.

4. Basis of Processing

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

- Your consent (for instance, we will ask for your consent in case you decide to subscribe to our newsletter);
- our legitimate interests (in case You have any questions or inquiries we use our “legitimate interests” ground to answer to them);
- our legal obligations such as our duty to conduct KYC and AML checks on our customers;
- any other ground, as required or permitted by law in the specific respective context.

5. Purpose of Processing

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

- fulfilling our obligations under the terms of use applicable between DAOGroup and You, including those related to provisioning our Services to You;
- for the communication, support, feedback purposes;

- for legal compliance purposes;
- administering our Services;
- developing new Services;
- sending You technical notifications and support and administrative messages;
- for the purposes of ensuring security, identifying irregular website behavior, preventing fraudulent activity, and improving security at all possible levels.
- communicating with You about Services, promotions, events and other news and information we think will be of interest to You;
- processing any requests, inquiries, or questions you have addressed to us;
- monitoring and analyzing trends, usage, and activities in connection with our Services;
- detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of DAOGroup and others.

6. Data Retention

We will retain Your Personal Data no longer than it is needed for the purposes it has been collected. This requirement is also conditioned by the need of complying with legal obligations and resolving possible disputes. 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. When we no longer need Personal Data, we securely delete or destroy it. Aggregated data, which cannot identify a device/browser (or individual) and are used for purposes of reporting and analysis, are maintained for as long as commercially necessary.

7. Sharing Personal Data with Third Parties

We may share Your Personal Data:

- 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, webform, and email service providers);
- 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, page views, app performance, time spent on pages, and links clicked. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, and better understand Your online activity.
- in connection with KYC and AML checks, including check status/outcome, identity document, and information, photo as well as the name, surname, place of residence, income sources, date of birth, PEPs, data related to sanctions, and other information used for conducting KYC and AML checks;
- in other instances where you permit us to do so.

8. 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.
- 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 or partners only if necessary for business and operational purposes as described in the section above, provided the mentioned parties will take minimum the same care of your Personal Data as we do under this Privacy Policy

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.

9. Your Rights Regarding Your Personal Data DAOGroup Collects and Processes

You have the following rights:

- **The right to know what Personal Data DAOGroup processes and get details of such processing.** That means that You have the right to ask DAOGroup to 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 DAOGroup 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 DAOGroup to erase Personal Data.** You can request DAOGroup 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, DAOGroup will erase it unless **otherwise required** by the applicable legislation.
- **The right to request DAOGroup 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 DAOGroup is accurate, the processing of Your data may be restricted for the period of time DAOGroup 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 DAOGroup at any time, without affecting the lawfulness of processing based on consent before its withdrawal. After we at DAOGroup 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. For instance, You may withdraw Your consent by unsubscribing from our newsletter and we will not be processing Your Personal Data for the purposes of

sending You news via email. This does not mean that we will not be processing Your Personal Data for other purposes as long as their another lawful basis.

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

If You have any such issues, contact info@dao.group. You can also address any of Your complaints to the relevant data protection authorities.

10. Data Integrity & Security

We use relevant electronic and procedural safeguards to protect the privacy of the information You provide to us from loss, misuse, disclosure, alteration, and destruction. Please note that transmission of data or information (including communications by email) 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.

11. Eligibility

By using our Services, you represent and warrant that you are at least eighteen (18) years of age. If you are under the age of eighteen (18), you may not, under any circumstances or for any reason, use the Services.

You are solely responsible for ensuring that this Privacy Policy is in compliance with all laws, rules, and regulations applicable to you and in your jurisdiction. If your use of the Services, or any functionality provided or activity enabled thereby, is prohibited or conflicts with any applicable law, rule, or regulation, you may not, under any circumstances or for any reason, use the Services.

FOLLOWING OUR TERMS, THE RESIDENTS AND CITIZENS OF THE USA, ARE PROHIBITED TO USE OUR SERVICES AND WEBSITES. PLEASE ALSO NOTE THAT IN CASE OF POSSESSING INFORMATION REGARDING YOUR AVOIDANCE OF THE DESCRIBED ABOVE BAN, WE RESERVE THE RIGHT TO DISCONTINUE TO PROVIDE OUR SERVICES TO YOU.

We may, in our sole discretion, refuse to offer the Services to any person or entity and change the eligibility criteria for use thereof at any time.

Note that we are not responsible for your use of the Ethereum blockchain and your data processed in this decentralized and permissionless network.

12. Changes to this Privacy Policy

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

13. Contact Us

If You have any questions about this Privacy Policy or our processing of Your Personal Data, please write to us by email please contact us at info@dao.group

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.