

ONDEFY PRIVACY POLICY

Effective date: 9 March 2022

The protection of your personal data is important to Ondefy. In this privacy policy, Ondefy explains in detail how it collects, uses, and discloses your personal data that you submit through the Platform. It also informs you about the choices that you have with respect to your personal data. Please read this privacy policy carefully.

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1. GENERAL INFORMATION

In this section, you can find general information about Ondefy, the Platform, and this Privacy Policy.

1.1 What does this Privacy Policy cover? This privacy policy (the “**Privacy Policy**”) governs the processing of personal data collected from individual users (“**you**” and “**your**”) through the online platform <https://ondefy.com>, the related domain names, software and services (collectively, the “**Platform**”). The Privacy Policy does not cover any third-party websites, applications or software that integrate with the Platform or any other third-party products and services; such third-party products and services are subject to their individual privacy policies.

1.2 Does Ondefy collect minors’ personal data? As stated in Ondefy [Terms of Service](#), the Platform can be used by persons that can conclude legally binding contracts. Ondefy does not knowingly collect personal data belonging to persons younger than 13. If you become aware that such a person has provided Ondefy with his or her personal data and you are a parent or a legal guardian of that person, please contact Ondefy immediately to make sure that child’s personal data is removed.

1.3 How long is this Privacy Policy valid? This Privacy Policy enters into effect on the date indicated at the top of the Privacy Policy and remains valid until terminated or updated by Ondefy.

1.4 Can this Privacy Policy be amended? Ondefy reserves the right to amend this Privacy Policy from time to time, if this is necessary to address the changes in Ondefy business practices, the functionalities of the Platform, laws, regulations, and industry standards. The amended version of the Privacy Policy will be posted on this page with a new effective date. You should review the Privacy Policy regularly to stay informed. If Ondefy has your contact details (e.g., your email address), you will receive a notice about the changes that will be implemented.

2. WHAT INFORMATION DOES ONDEFY COLLECT?

In this section, you can find information on what personal data is collected from you, for what purposes it is used, what technical data is collected automatically when you use the Platform, and how Ondefy communicates with you.

2.1 How is your personal data obtained? Ondefy obtains your personal data from the following categories of sources:

- **Directly from you.** For example, if you submit your personal data when you contact Ondefy;
- **Directly or indirectly through your activity on the Platform.** When you use the Platform, Ondefy automatically collects technical information about your use of the Platform by means of cookies and analytics services; and
- **From third parties.** Ondefy may receive information about you from third parties to whom you have previously provided your personal data, if those third parties have a legal basis for disclosing your personal data to us.

2.2 What personal data does Ondefy collect? To ensure our compliance with data minimisation principles, Ondefy collects only a minimal amount of personal data that is necessary for your use of the Platform, as explained below. Ondefy does not repurpose your personal data, unless you provide your prior consent for the new purposes.

- **Subscription to beta waiting list.** When you subscribe to the waiting list, Ondefy collects your email address. Your email address is used to add you to our waiting list, inform you about new launches or the Platform, contact you, if necessary, and maintain business records. The legal bases on which Ondefy relies are '*your consent*' and '*pursuing legitimate interests*' (i.e., operate, analyze, grow, and

administer the Platform). Your email address is stored until you unsubscribe from the waiting list.

- **Account and wallets.** When you create your account, Ondefy collects your email address. When you create a wallet, you will be asked for information about your wallet (for example, transactional history that is necessary to provide you with the requested services). Magic.link stores your email address or wallet information - it is done by the third-party authentication service provider <https://magic.link>. Your email address is used to send you a verification code, register and maintain your user account, and contact you, if necessary. Your wallet information is used to provide you with the requested services. **ONDEFY NEVER ASKS YOUR PRIVATE KEYS OR OTHER SECURITY INFORMATION THAT WOULD ALLOW ONDEFY TO ACCESS YOUR WALLET WITHOUT YOUR AUTHORIZATION.** The legal basis on which Ondefy relies is *'performing a contract with you'*. Your email address and wallet information are stored until you stop using Ondefy (for example, delete your user account). **ONDEFY DOES NOT STORE YOUR WALLET PASSWORD, PRIVATE KEY, OR SEED PHRASE. THEREFORE, ONDEFY WILL NOT BE ABLE TO HELP YOU TO ACCESS YOUR WALLET IF YOU LOSE ACCESS TO YOUR PASSWORD AND SEED PHRASE. PLEASE NOTE THAT, IN CASE OF SUCH A LOSS, ANY ASSETS HELD IN YOUR WALLET MAY BE PERMANENTLY IRRETRIEVABLE.**
- **Enquiries.** When you contact Ondefy by email, Ondefy collects your first name, last name, email address, and any information that you decide to include in your message. Such data is used to respond to your enquiries and provide you with the requested information. The legal bases on which Ondefy relies are *'pursuing legitimate interests'* (i.e., to grow and promote the Platform) and *'your consent'* (for optional personal data). Ondefy will store this data until you stop communicating with Ondefy.

2.3 Cookies and other tracking technologies. When you browse the Platform, Ondefy collects your cookie-related data and uses other tracking technologies. Ondefy uses such information to analyze the technical aspects of your use of the Platform, conduct its marketing campaigns, prevent fraud and abuse, and ensure the security of the Platform. For more information on the use of cookies and other tracking technologies, please refer to Ondefy [Cookie Policy](#). The legal bases on which Ondefy relies are *'pursuing legitimate interests'* (i.e., analyzing content and protecting the Platform) and *'your consent'*. Ondefy will store this data as long as analytics records are necessary for its activities or you withdraw your consent.

2.4 Does Ondefy collect any sensitive data? Ondefy does not collect or have access to any special categories of personal data (“sensitive data”) from you, unless you decide, at your own discretion, to provide such data to Ondefy. Sensitive data refers to your health, religious and political beliefs, racial origins, membership of a professional or trade association, or sexual orientation.

2.5 What happens if you refuse to provide personal data when requested? If you decide not to provide Ondefy with your personal data when you are asked for it, Ondefy may not be able to perform the requested operation and you may not be able to use the full functionality of the Platform, receive the requested information, or get a response. Please contact Ondefy immediately if you think that any personal data that Ondefy collects is excessive or not necessary for the intended purpose.

2.6 Does Ondefy collect analytics data? When you browse the Platform, Ondefy collects certain technical analytics data that allows Ondefy to analyze your use of the Platform. Ondefy uses third-party analytics service providers like Google Analytics for collecting such data:

- URL addresses from which you access the Platform;
- Your device type;
- Your operating system;
- Your browser name and version;
- Your network;
- Geolocation data; and
- Your other online behavior (for example, cookie-generated data, as explained in the [Cookie Policy](#)).

2.7 For what purposes does Ondefy use analytics data? Your analytics data allows Ondefy to analyze how you find and use the Platform, measure your engagement with the Platform, see which parts of the Platform are interesting to you, improve the content available on the Platform, develop new products and services, and investigate and prevent security issues and abuse. In most cases, such analytics data is non-personal and it does not allow Ondefy to identify you as a natural person. However, some of such data like your IP address may be considered personal data and Ondefy will make sure that Ondefy has the necessary legal basis for processing such data. When Ondefy processes your analytics data that is personal data, it relies on the ‘*legitimate interest*’ (i.e., to analyze, improve, and protect the Platform) and ‘*your consent*’ bases.

2.8 Does Ondefy keep your feedback? If you contact Ondefy, it may keep records of any questions, complaints, recommendations, or compliments made by you and the response. Where possible, your personal data will be de-identified (i.e., Ondefy will remove all personal data that is not necessary for keeping such records).

2.9 Does Ondefy send you commercial communication? If you opt-in for a newsletter, subscribe to the newsletter, or use the Platform, Ondefy will inform you about new services, features of the Platform, and special offers. The legal bases on which Ondefy relies are ‘*your consent*’ (if you opt-in) and ‘*pursuing our legitimate business interests*’ (i.e., promoting the Platform). You can opt-out from receiving commercial communication at any time free of charge by clicking on the “unsubscribe” link included in the newsletters or by contacting Ondefy directly. Ondefy uses the third-party service provider SendInBlue to deliver you its newsletters.

2.10 Does Ondefy send you transactional notices? If Ondefy has your email address and it is necessary to do so, Ondefy may send you important informational messages. Please note that such messages are sent on an “if-needed” basis and they do not fall within the scope of commercial communication that may require your prior consent. You cannot opt-out from service-related notices.

3. FOR HOW LONG IS YOUR PERSONAL DATA STORED?

In this section, Ondefy explains for how long it keeps your data and how it is deleted.

3.1 For how long does Ondefy store your personal data? Ondefy and its data processors store your personal data only for as long as such personal data is required for the purposes described in this Privacy Policy or until you request Ondefy to update or delete your personal data, whichever comes first. For more details about the period for which each type of personal data is stored, please refer to section 2.2. After your personal data is no longer necessary for its purposes and there is no other legal basis for storing it, Ondefy will immediately securely delete your personal data from its systems. Ondefy does not store any personal data longer than strictly necessary.

3.2 For how long does Ondefy store your non-personal data? Ondefy retains non-personal data pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include storing non-personal data for the period of time needed for Ondefy to examine its activities, fulfill its contractual obligations, pursue legitimate interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

3.3 What happens when Ondefy has a legal obligation to store your personal data? When Ondefy is obliged by law to store your personal data for a certain period of time (e.g., for keeping business records), Ondefy will store your personal data for the time period stipulated by the applicable law and delete the personal data as soon as the required retention period expires.

4. WHO HAS ACCESS TO YOUR PERSONAL DATA?

In this section, you can find information about third parties that may have access to your personal data.

4.1 When does Ondefy disclose your personal data to its third-party service providers? Ondefy keeps your personal data in strict confidentiality. However, if necessary for the intended purpose of your personal data, Ondefy will disclose your personal data to entities that provide services on its behalf (data processors). Your personal data may be shared with entities that provide technical support services to Ondefy, such as email distribution, security, and authentication services. Ondefy does not sell your personal data to third parties and does not intend to do so in the future. Ondefy only discloses your personal data to third parties when it is required for the following purposes:

- Ensuring the proper operation of the Platform;
- Delivering you the requested services;
- Responding to your enquiries;
- Pursuing legitimate interests;
- Enforcing Ondefy's rights, preventing fraud, and security purposes;
- Carrying out Ondefy's contractual obligations;
- Law enforcement purposes; or
- If you provide your prior consent to such a disclosure.

4.2 Who are Ondefy's third-party service providers? The third-party service providers that have access to certain types of your personal data are;

- The newsletter service provider SendInBlue located in France;
- The analytics and marketing service providers Google Analytics, DataDog, and Mouseflow located in the United States;
- The authentication service provider magic.link located in the United States; and
- The infrastructure service provider AWS (Amazon) based in America.
- Ondefy's independent contractors and consultants.

4.3 International transfers. Some of Ondefy's data processors may be based outside the country where you reside. For example, if you reside in the UK or a country belonging to the European Economic Area (EEA), Ondefy may need to transfer your personal data outside the UK or the EEA. In case it is necessary to make such a transfer, Ondefy will make sure that the country in which our data processor is located guarantees an

adequate level of protection for your personal data or Ondefy concludes an agreement with it that ensures such protection.

4.4 Business transfers. If Ondefy is sold in part or in full, goes out of business, bankrupts, or makes significant changes in its company control, your personal data may be transferred to or acquired by a third party, as necessary for the transaction.

4.5 Disclosure of non-personal data. Your non-personal data may be disclosed to third parties for any purpose as it does not identify you as a natural person. For example, Ondefy may share it with prospects or partners for business or research purposes, for improving the Platform, responding to lawful requests from public authorities or developing new products and services.

4.6 Legal requests. If requested by a public authority, Ondefy will disclose information about the users of the Platform to the extent necessary for pursuing a public interest objective, such as national security or law enforcement.

5. HOW DOES ONDEFY PROTECT YOUR PERSONAL DATA?

Here you can find information on how Ondefy protects your data against breaches.

5.1 What are Ondefy's security measures? Ondefy strives to ensure that your personal data is always secure by using proper authentication, secured networks, strong passwords, limited access to your personal data by its staff, anonymisation of personal data (when possible), limited disclosure to third parties, encryption, use of virtual private networks, protection against phishing and untrusted data injection, regular security audits, and carefully selected data processors.

5.2 What happens if there is a security breach? Given the nature of communication and information processing technology and the Internet, Ondefy cannot be liable for any unlawful destruction, loss, use, copying, modification, leakage, and falsification of your personal data caused by circumstances that are beyond its reasonable control. By using the Platform, you acknowledge that you understand and agree to assume such risks. In case a serious breach occurs, Ondefy will take reasonable measures to mitigate the breach, as required by the applicable law. Ondefy's liability for any security breach will be limited to the highest extent permitted by the applicable law. Please note that you play an important role in preventing security breaches and unauthorized access to your personal data. Therefore, please do not disclose your security credentials to anyone or leave your wallet in an insecure manner.

6. WHAT RIGHTS DO YOU HAVE WITH REGARD TO YOUR PERSONAL DATA?

Here you can find detailed information about the rights that you have with regard to your personal data and how to exercise those rights.

6.1 What rights can you exercise? You have the right to control how Ondefy processes your personal data. Subject to any exemptions provided by law, you have the following rights:

- **Right of access:** you can get a copy of your personal data that Ondefy stores in its systems and a list of purposes for which your personal data is processed;
- **Right to rectification:** you can rectify inaccurate personal data that Ondefy holds about you;
- **Right to erasure ('right to be forgotten')**: you can ask Ondefy to erase your personal data from its systems;
- **Right to restriction:** you can ask Ondefy to restrict the processing of your personal data;
- **Right to data portability:** you can ask Ondefy to provide you with a copy of your personal data in a structured, commonly used and machine-readable format and move that personal data to another processor;
- **Right to object:** you can ask Ondefy to stop processing your personal data;
- **Right to withdraw consent:** you have the right to withdraw your consent, if you have provided one; or
- **Right to complaint:** you can submit your complaint regarding our processing of your personal data.

6.2 How to exercise your rights? If you would like to exercise any of your rights, please contact Ondefy by using our contact details available at the end of the Privacy Policy and explain in detail your request. In order to verify the legitimacy of your request, Ondefy may ask you to provide us with an identifying piece of information, so you can be identified. Your request will be answered within a reasonable time frame but no later than 30 days.

6.3 Complaints. If you would like to launch a complaint about the way in which Ondefy handles your personal data, please contact Ondefy first and express your concerns. Ondefy will investigate your complaint and provide you with a response as soon as possible (no later than 30 days). If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with your local data protection authority.

7. CONTACT

If you have any questions about this Privacy Policy, your rights, or our data protection practices, please send an email at contact@ondefy.com.

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