

WEB3ECO PRIVACY POLICY

Last Updated: 04.10.2023

Our company Web3Eco AG (**Company, We, Us**), respects and values your (**User, You**) privacy and does all possible to ensure the safety of the Personal Data You provide Us.

Under this Privacy Policy (**Policy**), We provide information on the extent of the Personal Data generally collected, explain to You the reasons for its collection, the way We use it, and identify third parties with whom Your data may be shared.

This Policy is integral to the Web3eco Terms and Conditions (**Terms**). Please carefully study this Policy and contact Us in case You have any unclarified points or misunderstandings.

Terms & Definitions

- Site** An aggregate of information, web forms, software and hardware, and intellectual property objects (including computer software, database, graphic interface design, content, etc.) that belong to the Company can be accessed from various User devices connected to the Internet through special web browsing software (browser) at “web3eco.io” domain, including domains of the following levels, to get access to the gaming functionality.
- We / Us / Our / Company** Web3Eco AG, a Switzerland joint stock company, UID: CHE-364.476.358, addressed at c/o Wilhelm Gudelow, Aegeristrasse 5, 6300 Zug.
- You / User** Individuals and(or) legal entities who conform to the eligibility requirements foreseen in the Terms and accepted this Policy.
- Personal Data** Any information relating to an identified or identifiable living individual that Users provide Us, information collected about You automatically by Site, information You shared with Us for verification and communication purposes, and information that We obtain from third parties.
- Personal Data Processing** A wide range of operations performed on Personal Data, including by manual or automated means, the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of Personal Data.
- Cookies** A small text file that can be stored on Your device when You visit the Site. Certain information is saved in this text file, such as the choice of Site language. When You visit the Site again, this Cookie is sent to the Site, so its system recognizes Your browser and may, for example, save Your language preferences.

Where this document implements any terms not defined herein, it should be interpreted according to the Terms, its Annexures, applicable laws, and regulations and only as a last resort according to common practice.

1. POLICY ACCEPTANCE

- 1.1. Where You agree to all and any of the Policy provisions, You can accept this Policy by placing next to the “*I have read and agree to all the terms of the Privacy Policy*” during either: (a) Your first visit to the Site and(or) (b) filling the request for the NFT Tokens acquiring as foreseen under the Terms.
- 1.2. If You do not agree with any provision of this Policy, You shall immediately cease using the Site.

2. PERSONAL DATA COLLECTED

2.1. During Your use of the Site, You may provide Us with some information about Yourself, which includes the following types of Personal Data:

Type	Personal Data
Communication Data	<ul style="list-style-type: none"> Your email address; Other contact details that You use to contact Us.
Automatically Collected Data	<p>Technical information:</p> <ul style="list-style-type: none"> The internet protocol (IP) address; Browser type and version; Time zone setting; Browser plug-in types and versions; Operating system and platform. <p>Usage Data:</p> <ul style="list-style-type: none"> Uniform Resource Locators (URL) clickstream to, through, and from the Site (including date and time); Pages User viewed or searched for; Page response times; Download errors; Time of visits to certain pages; Click-stream data; Methods used to browse away from the page; other data collected via cookies and similar technologies.
Verification Data	<p>It is provided by You in case of Our or Project Partner's request and may include the following data:</p> <ul style="list-style-type: none"> Government issued identity document with the photo (e.g., ID card, passport, driving license); Proof of address document (e.g, utility bill, bank letter); Source of funds documents; Any other information necessary to fulfill legal obligations in accordance with the applicable AML/CTF laws and regulations.

2.2. We may add new features to the Site, to access which You may be asked to provide Us with additional information.

2.3. You provide Us with any Personal Data voluntarily. However, where You elect not to share with Us Your Personal Data, We may not be able to serve You as effectively and(or) alible Your access to the Site.

3. Collecting Purpose

3.1. We collect the aforementioned Personal Data for the following purposes:

Type	Purpose
Communication Data	To provide You with relevant feedback.
Automatically Collected Data	<ul style="list-style-type: none"> To ensure network and information security; To ensure the normal functioning of the Site; To enhance Your User experience; To indicate the errors and weak points of the Site and develop it.
Verification Data	<ul style="list-style-type: none"> To perform KYC verification before receiving from You any Digital Assets for the NFT Tokens;

	<ul style="list-style-type: none"> • Before providing You access to some of the functionalities of the Site.
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- 3.2. We will only use Your Personal Data for the purposes for which We collected it unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose, or We are obliged to process Your data by applicable laws or court/enforceable orders. Where we need to use Your Personal Data for an unrelated purpose, we will notify You and explain the legal basis which allows Us to do so.
- 3.3. Upon receiving Your consent, please note that We may provide You with information about the Site.

4. COLLECTING PROCEDURE

- 4.1. We may collect Personal Data from Users in a variety of following ways:

Type	Collection Way
Communication Data	We get access to such Personal Data when You reach Us for any questions to get customer service or other purposes (e.g., by email).
Automatically Collected Data	When You interact with the Site, We may collect this Personal Data using cookies, server logs, and other similar technologies.
Verification Data	We receive such Personal Data directly from You, as well as obtain it from other sources based on the Personal Data we have.

5. RETENTION PERIOD

- 5.1. We will keep Your Personal Data for no longer than necessary for that purpose or its collection. Generally, We will retain and delete Your Personal Data as follows:

Type	Period
Communication Data	We will keep it until the moment. We will provide You with feedback.
Automatically Collected Data	We keep it during the whole period of Your use of the Site. Where required by applicable law, Personal Data may be retained after that within the period prescribed by such laws.
Verification Data	We keep it during the whole period of Your use of the Site. Where required by applicable law, Personal Data may be retained after that within the period prescribed by such laws.

- 5.2. Please note that We can keep Your Personal Data for an extended period where the relevant laws and regulations require it.

6. LEGAL BASIS FOR PROCESSING

- 6.1. The processing of Personal Data is performed following privacy rights and regulations following the Swiss Federal Act on Data Protection, 2023 (**FADP**) and the EU General Data Protection Regulation - Regulation (EU) 2016/679 (**GDPR**), the Terms and Our internal regulations.
- 6.2. Where regulations of the country of Your location provide for stricter Personal Data standards, the processing of Your Personal Data will be effectuated following these standards.
- 6.3. Generally, the legal grounds for Personal Data Processing could be listed as follows:
 - (a) **Your Consent:** You grant Us consent for processing Your Personal Data for specific purposes; the lawfulness of such processing is based on Your consent. Giving Us Your consent to the processing of Your Personal Data is voluntary. Any authorization granted may be revoked at any time. Please be advised that the revocation shall only

have effect in the future. Any processing carried out before the revocation shall not be affected.

- (b) **Agreement Performance:** It means processing Your Personal Data where it is required to perform an agreement to which You are a party or to take steps at Your request before agreeing. This includes the Terms.
- (c) **Our Legitimate Interest:** It means Our interest in conducting and managing Our business affairs appropriately and responsibly, protecting the reputation of Our business, and providing You with the best possible and secure gaming experience.
- (d) **Legal Compliance:** We process Your Personal Data where necessary for compliance with a legal or regulatory obligation.

7. SHARING WITH THE THIRD PARTIES

7.1. We sometimes need to share Your Personal Data with third parties. Please find below the list of the limited third parties with whom We may transfer Your Personal Data:

(a) **Project Partners**

We require all such entities to respect the security of Your Personal Data and treat it following the law and, in any case, apply our Personal Data protection standards outlined in the present Terms. We do not allow them to use Your Personal Data for their purposes and only permit them to process Your Personal Data for specified purposes and following Our documented instructions.

(b) **Courts and(or) authorities and(or) law enforcement officials**

We will only use and share Your Personal Data where it is necessary for Us to lawfully carry out Our business activities, in other words, where applicable laws and regulations require it.

(c) **Analytics and search engine providers**

We provide them with such information to improve and optimize the Site, but we can guarantee that We will not sell, exchange, or share Your personal information with any third parties Your Personal Data without Your express consent.

8. CROSS BORDER TRANSFER

- 8.1. To facilitate Our global operations, Our Company may use the services of overseas data processing service providers unless Your jurisdiction laws and regulations limit such data transfer.
- 8.2. We hereby warrant that We will only transfer Your Personal Data to countries deemed to provide adequate protection for Personal data compared to the FADP and the GDPR. We will make all possible efforts to ensure the safety of Your Personal Data following this Privacy Policy wherever Your Personal Data is processed. We will take appropriate contractual or other steps to protect the relevant Personal Data following applicable laws.
- 8.3. Where such service providers are not established in a country ensuring an adequate level of protection within the meaning of the FADP and the GDPR, such as the United States, the transfers will be covered by the standard data protection clauses adopted by the FADP and the GDPR or by another appropriate safeguard mechanism.

9. PERSONAL DATA SECURITY

- 9.1. We have implemented several technical, organizational, and administrative measures to ensure the confidentiality, integrity, availability, and privacy of Your Personal Data and to protect Your Personal Data from loss, theft, unauthorized access, misuse, alteration, or destruction, which are generally accepted by the industry to protect the Personal Data.
- 9.2. These measures include but are not limited to implementing security technologies: Secure Sockets Layered (**SSL**) technology to ensure that Your Personal Data is fully encrypted and sent across the Internet securely, secure coding principles, and regular penetration testing.

- 9.3. We also use encryption (**HTTPS/TLS**) to protect data transmitted to and from the Site. Transport Layer Security (**TLS**) is a protocol that provides privacy and data integrity between two communicating applications. It's the most widely deployed security protocol used today and is used for Web browsers and other applications that require data to be securely exchanged over a network, such as file transfers, VPN connections, instant messaging, and voice-over IP.
- 9.4. Only authorized Company personnel have access to the Personal Data, and these personnel are required to treat the Personal Data as confidential. The security measures in place will, from time to time, be reviewed in line with legal and technical developments.
- 9.5. If You become aware of any potential data breach or security vulnerability, You are requested to contact Us immediately. As required, we will use all measures to investigate the incident, including preventive measures.

10. YOUR RIGHTS

- 10.1. Your principal rights as the Personal Data subject include the following:
 - (a) **Access:** You may request Us to provide You with a copy of Your Personal Data that we have access to. We will give You such information within a reasonable period and may require You to compensate for the expenses associated with gathering the information.
 - (b) **Rectification:** You may request Us to rectify or update any of Your Personal Data. You can do this using relevant Site functionality or by contacting Us directly. The Company reserves the right to reject personal assistance where rectification of Personal Data is available through the Site functionality.
 - (c) **Deletion:** You may request Us to erase Your Personal Data, subject to applicable law. Please note that we may not always be able to comply with Your request for erasure for specific legal reasons, which will be notified to You, if applicable, at the time of Your request.
 - (d) **Consent Withdrawal:** To the extent the processing of Your Personal Data is based only on Your consent, You may withdraw Your consent at any time. It will not affect the lawfulness of any processing before the withdrawal. Please note that any processing activities not based on Your consent will remain unaffected.
 - (e) **Restrict Processing:** In some jurisdictions, applicable law may give You the right to restrict or object to Us processing or transfer Your Personal Data under certain circumstances. We may continue to process Your Personal Data if necessary to defend legal claims or any other exceptions permitted by applicable law.
- 10.2. Kindly note that none of the rights is absolute, meaning they must generally be weighed against Our legal obligations and legitimate interests. If a decision is taken to override Your request, You will be informed of this by Us, along with the reasons for Our decision.
- 10.3. To exercise such rights, You may contact Us at the email address provided at the end of this document.

11. COOKIES

- 11.1. Cookies usually have an "*expiration date*" which indicates how long they are stored on Your device. Some cookies are automatically deleted when You close Your browser (session cookies), while others remain on your device for a more extended period, sometimes until You manually delete them (permanent cookies).
- 11.2. Except for the cases specified in this Policy, the Cookies are necessary for the functionality and effectiveness of the Site system, for example, by making it more efficient and facilitating the use of the functionality and services provided. These functional and(or) operational Cookies will be deleted from Your device at the end of the browser session (session cookies). We will not use the information stored in the mandatory Cookies for any other purposes except in case of extreme necessity to provide You with the requested functionality. Tracking technologies (such as cookies) can be permanent (i.e., they are stored on Your computer until You delete them) or temporary (i.e., they are stored until You close Your browser).

- 11.3. We use both permanent and session cookies, as well as their varieties, for the operation of the Site:
 - (a) **Mandatory Cookies:** necessary for the normal functioning of the Site system.
 - (b) **Analytical and operational Cookies:** You can track traffic to the Site system.
- 11.4. Cookies can be used to create statistics that help You understand exactly how visitors use the Site system.
- 11.5. You have the option to accept or reject all Cookies by changing the settings in Your Internet browser. Each browser needs to use its settings to change and delete Cookies. Please note that certain functionality of the Site system may not be available when Cookies are disabled. To learn more about adjusting or changing Your browser settings, refer to the browser instructions at www.aboutcookies.org (available in English) or allaboutcookies.org (available in English, Spanish, German, and French).

12. EXTERNAL LINKS

- 12.1. The Site may contain links to third-party websites maintained by non-affiliated third persons whose personal data processing and privacy practices differ from Ours.
- 12.2. The Company is not responsible or liable for such third parties' personal data processing or privacy practices. We strongly recommend that You read the privacy statements of all third-party websites before using such Sites or submitting any Personal Data or any other information on or through such websites.

13. CHANGE OF OWNERSHIP

- 13.1. You hereby acknowledge and agree that in the event of a change of ownership or control of all or a part of the Company, including without limitation through acquisition, merger, or sale, the Company can transfer all or portion of the Personal Data to the successor to the Company.

14. AMENDMENTS

- 14.1. This Policy may be revised, updated, and(or) amended at any time without prior notice at the Company's discretion. If such amendments are made, the date when this Policy was updated will be displayed on the first page of the Policy.
- 14.2. You undertake at Your own risk to keep Yourself updated with the Policy amendments. We strongly recommend that You do the following: (i) memorize/make a note of the date of the last update provided in the document (e.g., to save its copy) upon the initial visit of the Site and any time upon amendment of the Policy, (ii) regularly visit the relevant page of the Site and study the entire Policy in case of change in the updated date.
- 14.3. By using the Site after the Policy has been amended, You automatically confirm Your consent to the amended Policy. If You do not agree with any amendment of this Policy, You shall immediately cease all Site use.

CONTACT US

If anything is left unclear in the text of this Policy, we will be glad to clarify its provisions. For any questions related to the Policy, please contact Us via email at info@web3eco.io.