

## Privacy Policy

Effective as of 2022/4/27

Welcome to CryptoNatty!

This Privacy Policy sets out the privacy practices of CryptoNatty Pte. Ltd. ( "**CryptoNatty**", "**we**", "**us**", "**our**", "**ours**" or "**ourselves**" ), and how we handle personal information that we collect through our services that link to this Privacy Policy, being our website located at Singapore or, any of our associated websites, application programming interfaces ("**APIs**"), mobile apps or other related services or applications (collectively, the "**Site**") and any contents, information and materials contained in or appeared on the Site, including without limitation, CryptoNatty logo, trademarks, icons, service names, slogans, meta tags, text, links, files, graphics, photos, pictures, videos, designs, data, sound files, selections and arrangements, integrations, features, functionalities (collectively, the "**Content**"), as developed from time to time, which are owned, operated and provided by or on behalf of CryptoNatty. We refer to the Site and the Content collectively as the "**Services**".

This Privacy Policy and our Terms of Service located at ([www.cryptonatty.io](http://www.cryptonatty.io)) (the "**Terms**") and the other related agreements, policies, notices and documents located at Singapore, with their amendments, supplements and other modifications from time to time, shall constitute your agreement with us with respect to your access and use of the Site and the Services.

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## 1. Personal information we collect

### (a) [Personal information you provide to us

Personal information that you provide to us through the Services or otherwise may include:

- **Contact information**, such as your first and last name, salutation, email address, billing and mailing addresses, contact information, company name, company website.
- Your communication with us, including when you contact us with questions, feedback, or otherwise.
- **Marketing information**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Social media information**, such as information you use to login to, and posts you make on, the Site or our Discord and/or Twitter server.
- **Payment information**, such as your credit card numbers, email address, Metamask wallet address, Ethereum wallet address needed to complete your transactions.
- **Transaction information** such as your purchase and return history.
- Other information not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

### (b) Automatic data collection

We, our service providers, and our business partners may automatically collect certain information when you use the Site and/or the Services, such as your computer's or mobile device's operating system type and version, Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your access to or use of the Site and/or the Services, such as pages that you visit before, during and after using the Site and/or the Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use the Site and/or the Services. We also track the floor price, volume, and average prices for all NFTs hosted on our Site over time.

### (c) Cookies, Web beacons and other similar technologies

We may use cookies, web beacons and other technologies to automatically collect information through your access to or use of the Site and/or the Services:

- **Cookies**, which are text files that the Site stores on your device to uniquely identify your browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns and facilitating analytics.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

### (d) Other sources

We may obtain information about you from other sources, including through third party service providers. For example, if you access the Site and/or the Services through third party websites, applications, portals, login services, we may collect information about you from that third party websites, applications, portals, login services that you have made available via your privacy settings. You understand and agree and this Privacy Policy does not cover how your information is

collected or used by such third party websites, applications, portals, login services and we encourage you to review the relevant privacy policies of such third party websites, applications, portals, login services (where applicable).

(e) **Public information**

We may obtain information about you from information or activity that is publicly visible and/or accessible on a Blockchain or the public domain through different channels (e.g. newspaper, a public directory or a public search engine). This may include blockchain addresses and information regarding your purchases, sales, or transfers of NFTs, which may then be associated with other data you have provided to us.

(f) **[Sensitive information**

We do not collect sensitive data or special category data about you. This includes details about your race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, or sexual orientation.]

## **2. How we use your personal information**

2.1 We may use your personal information for a variety of business purposes, including to provide our Services, for compliance and protection purposes and to market our products and services or as otherwise described at the time of collection:

(a) **Provide our Services**

We use your personal information to:

- Provide access to certain areas, functionalities and features of the Services and improve the Services and our business;
- process your payment information, arrange delivery, provide invoices/order confirmations and complete transactions with you;
- communicate with you about the Services, including by sending our newsletter via email;
- understand your needs and interests, and personalise your experience with the Services and our communications;
- provide support for the Services, respond to your requests, questions and feedback;

(b) **Compliance and protection purposes**

We may use your personal information to:

- comply with all laws and regulations or national security requests and legal process, such as to respond to a court order or subpoena or requests from government authorities;
- detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity.
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- comply with internal quality control and safety; and
- enforce the terms and conditions that govern the Services.

(c) **Research and development**

We may use your personal information for research and development purposes, including to

analyze and improve the Services and our business. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect.

We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business.

(d) Marketing

We may send you targeted advertisements or marketing communications we believe may be of interest to you permitted by the Applicable Law, including by email. You may opt-out of our email communications as described in the Email communications section below.

**3. How we share your personal information**

3.1 We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection:

(a) Disclosure to provide our Services

Our subsidiaries, joint ventures, or other companies under our common control ("**Affiliates**") or other third party service providers that provide Services on our behalf or help us operate the Site, the Services or our business (such as hosting, information technology, payment processors, customer support, email delivery, and website analytics services). We may share some or all of your personal information with such Affiliates, in which case we will require our Affiliates to honor this Privacy Policy. In the case of third party service providers, we will require them to maintain confidentiality and security of your personal information that they process on our behalf and to implement and maintain reasonable security measures to protect the confidentiality, integrity, and availability of your personal information. We will take reasonable steps to confirm that all third party service providers that we engage process personal information in the manner that provides at least the same level of protection as is provided under this Privacy Policy. Where any third party service provider is unable to satisfy our requirements, we will require them to notify us immediately and we will take reasonable steps to prevent or stop such non-compliant processing.

(b) Disclosure to professional advisors

Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

(c) Disclosure to protect us or others

External parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

(d) Disclosure in the event of merger, acquisition, reorganisation etc.

Acquirers and other relevant participants in business transactions (or negotiations for such transactions) if we are involved in a merger, acquisition, financing due diligence, reorganisation, bankruptcy, receivership, purchase or sale of a portion or all assets, or transition of service to another provider, you.

(e) Disclosure with your consent

We may use your personal information for other purposes that are clearly disclosed to you at the time you provide the personal information or with your consent.

3.2 Please keep in mind that whenever you voluntarily make your personal information available for viewing by third parties or the public on or through the Services, including our Discord and or Twitter server that information can be seen, collected and used by others. Any such information will be considered "public", unless otherwise required by any Applicable Law, and is not subject to the terms of this Privacy Policy.

#### **4. Storage and Security**

(a) Storage

We only retain personal information for so long as it is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. After such time, we will delete or anonymise your information, or if this is not possible, we will securely store your information and isolate it from further use. We periodically review the basis and appropriateness of our data retention policy.

(b) Security

We take security measures to ensure that your personal information is treated securely. However, no security measures or transmissions of information on the internet are failsafe and we cannot guarantee your personal information, while stored on our systems or processed by us or during transmission through the internet, is 100% safe and secure.

#### **5. Your privacy choices and rights**

5.1 You have the following choices and rights with respect to your personal information:

(a) Information rights

In accordance with the Applicable Law, (1) you may have the right to be informed of what we do with your personal information and to request a copy of personal information we hold about you; (2) you may require us to correct any inaccuracy or error in any personal information we hold about you or to request erasure of your personal information (save that we may not always be able to comply with your request of erasure for record keeping purposes, to complete transactions, or to comply with our legal obligations); (3) you may object to or restrict the processing by us of your personal information; and (4) you may have a right to lodge a complaint with a relevant supervisory authority if you believe our processing of your personal information violates the Applicable Law.

(b) Consent

If you have given us consent to use your personal information for a specific purpose, you have the right to withdraw your consent any time by contacting us (please refer to Clause 9 for contact information), but please note this will not affect any use of your information that has already taken place.]

(c) Opt-out of marketing communications

You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing

emails.

(d) **Do Not Track**

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we currently do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

(e) **Cookies**

You may stop or restrict the placement of cookies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, the Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

(f) **Declining to provide information**

We need to collect personal information to provide certain Services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those Services.

5.2 As a security measure, we may need specific information from you to help us confirm your identity when processing your privacy requests or when you exercise your rights. Any request under this Clause 5 will normally be addressed free of charge. However, we may charge a reasonable administration fee if your request is clearly unfounded, repetitive, or excessive.

5.3 We will promptly respond to all legitimate requests. Occasionally, it may take us longer than usual to respond if your request is particularly complex or if you have made a number of requests.

**6. Other sites and services**

The Site and/or the Services may contain links to websites, applications, portals or login services operated by third parties. In addition, our content may be integrated into websites or other online services that are operated by third parties. These links and integrations are not an endorsement of, or representation that we are affiliated with, any such third parties. We do not control these third parties, and we are not responsible for their actions. You understand that you are at your own risk if you are to provide personal information to such third parties and we encourage you to review the privacy policies of such third parties before you use such third party websites, applications, portals, login services.

**7. International data transfers**

We are headquartered in Singapore and collect information globally and primarily store the information in Singapore. However, where require, we may transfer, process and store your information outside Singapore where we or our service providers operate for the purposes of providing the Services. Some of the countries in which our companies or our service providers are located may have not have the privacy and data protection laws that are equivalent to those in Singapore. We will use reasonable endeavours to protect your personal information in accordance with the Applicable Law.

**8. Minor**

The Site and/or the Services are not intended for use by a person below 14 years old (or other age as required by the Applicable Law) and we do not knowingly collect personal information of such person. If we become aware that we have collected personal information through the Services from

a person under 14 years old without the consent of the guardian of such person as required by the Applicable Law, we will delete any such personal information unless we have a legal obligation to keep it.

#### **9. Changes to this Privacy Policy**

We reserve the right to change or modify this Privacy Policy at any time and in our absolute and sole discretion. If we make any changes to this Privacy Policy, we will provide a notice of such change to all users (including you), on the Site and send an email/webmail to your email/webmail account notifying you with respect to such change and present the updated Privacy Policy on relevant webpages on the Site. By continuing to access to or use the Site and/or the Services at any point after such notice, you confirm your acceptance of the revised Privacy Policy and all of the terms incorporated therein by reference. We encourage you to review the Privacy Policy frequently to ensure that you understand the terms and conditions that apply when you access and/or use the Site and/or the Services. If you do not agree to the revised Privacy Policy, you may not access or use the Site and/or the Services.

#### **10. Contact us**

You can reach us by email at [baselabs@cryptonatty.io](mailto:baselabs@cryptonatty.io).