

## Privacy Policy

The VETRI Foundation, c/o Trust Square AG, Bahnhofstrasse 3, CH-8001 Zürich ("VETRI" or "we") operates the VETRI App ("**App**") and is responsible for collecting, processing and using your personal data through the App in compliance with the applicable data protection laws. In this Privacy Policy we inform you about possible rights you are entitled to. Such rights depend on the data protection laws applicable to us. Therefore, you may have more rights than set forth in this Privacy Policy or certain rights may not be accessible to you.

As part of the App we enable you to use the following features:

- Data Vault: secure storage of your data on your device;
- Data Requests: you decide whether and what data you want to share, and if you decide to take part in surveys or answer requests from other users of the VETRI ecosystem ("**Data Consumers**") you will receive VLD tokens (in the testnet phase, serving as "points") in return;
- VETRI Wallet: for storing your VLD tokens and (after the testnet phase) exchanging them for rewards.

When you use the App we may process personal data about you. If you decide to share your data with Data Consumers, they may be able to identify you and so will be processing personal data about you. Personal data in this sense refers to all information relating to an identified or identifiable person.

It is very important that you keep in mind that sharing your personal data is a responsible activity and increasingly requires you to take precautionary measures to protect it. **You have the right to remain in full control over your personal data.** This means that you have the right to be made aware of risks, rules and safeguards in relation to the processing of your personal data. You have the right to ask questions about **how** and **why** your data is processed and, if you do not like the answer, you have the right to object to data processing and have your data erased.

Because your trust is important to us, we would like to inform you about how we may use your personal data. **The App is currently in a testnet phase and not all features are enabled. Due to the nature of testing, personal data may be collected, processed or disclosed in unintended ways during this testnet phase.**

We take the protection of data seriously and use our best endeavours to ensure appropriate security at all times. We observe the statutory provisions of the EU General Data Protection Regulation 2016/679 ("GDPR") and other EU and national data protection provisions, as applicable.

You can check our Privacy Policy on our App at any time by accessing the "privacy policy" buttons in the settings of the App.

You must also read and accept the privacy policy of each Data Consumer with whom you decide to share your personal data through the App.

If you have any questions regarding data protection, please reach out to our person responsible for handling your personal data on [privacy@vetri.global](mailto:privacy@vetri.global).

## **Data processing in connection with our App**

### **1. What data do we collect when you download and access our App?**

When you download our App the following technical data is collected without your intervention and stored by us until automated deletion, as in principle with every download and access of an app:

- the IP address of the requesting device,
- the operating system version of your device,
- the configuration of the App when using our services,
- name of the IP address range and name of the device,
- the date and time of the your use of our services,
- information on technical difficulties you encounter with the App,
- and potentially additional statistical information.

The collection and processing of these data are carried out for the purpose of enabling the use of our App (establishing a connection), ensuring system security and stability over the long term, testing and reporting bugs and optimising our services as well as for internal statistical purposes. It is within our legitimate interest to process such data.

In order to provide, test and help VETRI, its partners and third party developers to improve the App and the platform (VETRI data marketplace) you acknowledge that VETRI and its subsidiaries and agents will be collecting, using, storing, transmitting, processing and analysing diagnostic, technical, and usage logs and information from your device that is running the App and accessing the platform. This information will be collected in a form that does not personally identify you and may be collected from your device at any time. The information that would be collected includes, but is not limited to, general diagnostic and usage data, various unique device identifiers, various unique system or hardware identifiers, details about hardware and operating system specifications, performance statistics, and data about how you use your device in connection with the App and the platform. You agree that VETRI may share such diagnostic, technical, and usage logs and information with partners and third party developers for purposes of allowing VETRI to improve the App and the platform. By downloading, installing or using the App and the platform on your device, you acknowledge that VETRI and its subsidiaries and agents will collect all such information and use it as set forth above.

The data collected may also be used in the event of attacks on the network infrastructure respectively other unauthorised or abusive use of the App to identify offenders in connection with civil or criminal proceedings. The processing of this information is in our legitimate interest to secure and improve our App accordingly.

### **2. Is personal data automatically collected through the App?**

When using our App, we automatically collect certain data required to ensure the usability of the App. In particular:

- the internal ID of your device;
- the version of your operating system;
- the time of access
- the address of your VETRI Wallet.

The collection and processing of this data is carried out for the purpose of enabling the use of our app (establishing a connection), ensuring system security and stability over the long term and ensuring a customer friendly use of our App as well as internal statistical purposes. The processing of this personal data is within our legitimate interest.

The internal ID of your device and/or the address of your VETRI Wallet may also be evaluated together with other data in the event of attacks on the network infrastructure or other unauthorised or abusive use of our website for the purpose of clarification and defence and, if necessary, used within the framework of criminal proceedings for identification and for civil and criminal action against the users concerned. The processing of this information is in our legitimate interest.

### **3. What other data is collected through the App?**

In order to use the App in the testnet phase, you will be asked to provide the following data:

- In the initial stages (manual identity)
  - Email Address (when you sign up with your email address to the early access program)
  - Date of birth\*
  - Gender\*
  - Nationality\*
- In the later stages
  - Email Address (when you sign up with your email address to the newsletter or on the Website, your email will be used for updates)
  - A scan of the photograph page of your passport or your ID card with following data extracted from it automatically
    - Date of birth\*
    - Gender\*
    - Nationality\*
    - Permanent residence address

Additional or other information may be requested or required for use of the full-scope release of the App.

If a field is mandatory, it is marked with an asterisk when you register. If you do not enter this information, you will not be able to use the App.

We will also collect and process the following information relating to you:

- Financial information (in connection with your holding of VLD tokens and their conversion into rewards or other cryptocurrencies);
- Details of our interactions with you and any records of our communication;
- Identifiers we assign to you.

We use the mandatory information to authenticate you when you log in and to provide information to Data Consumers to ensure that the data they receive from you is useful to them. The processing of this data is necessary for us to fulfil our pre-contractual and contractual obligations towards you and is also in our legitimate interest.

#### **4. What personal data is collected when you are using the App?**

You will have the opportunity to enter, manage and edit various data in the Data Vault on the App, where it will be stored in secure form. You will choose whether and what parts of this data are provided to VETRI and to third parties through the App. VETRI will provide you with information on the purpose and means of processing of the data before you make such choice.

We use voluntary information in order to display it in the App according to the settings you have chosen and to make it available to Data Consumers at your request. The processing of this personal data is therefore necessary for us to fulfil our pre-contractual and contractual obligations and is also in our legitimate interest

#### **5. What personal data do we collect when you allow us to send you push notifications?**

You may be given the possibility to allow push notifications by us to be informed about news and current rewards available via the App. For this we will need the following information:

- First name, last name,
- Place of residence
- Preferences.

We use this information to deliver our communications only if you have consented to receive them. You can unsubscribe from our news services at any time.

#### **6. Do we use tracking tools?**

We may use tracking tools for the purpose of designing and continuously optimising our App to meet your needs. In this context, pseudonymised user profiles are created and small text files stored on your device are used. The information thereby generated about your use of our App is transferred to the servers of the provider of these services, stored there and processed for us. In addition to the data listed in section 1, we may receive the following information:

- navigation path of a user,
- time spent on the App,
- the country, region or city from which access is made,
- the device (type, version, colour depth, resolution, width and height of the browser window), and
- if you are a recurring or new user.

The information is used to evaluate the use of the App, to compile reports on App activity and to provide other services related to the use of the App and the internet for purposes of market research and need-based design of this App. In addition, this information may be transferred to third parties if this is required by law or if third parties process this data on our behalf.

## **Storage and exchange of data with third parties**

### **7. Is this data stored or linked?**

We store the data collected with our server host. The processing of this data is based on our legitimate interest in customer-friendly and efficient customer data management.

### **8. How long will my data be kept?**

We only store personal data for as long as you choose to keep installed and use the App and for further processing in the context of our legitimate interest. Data that you choose to release to Data Consumers will be stored by Data Consumers in accordance with their data retention policies, and you are responsible for familiarising yourself with these. Contract data, including your contact details and the scan of the photograph page of your passport or your ID card, is stored by us for a longer period of time, as this is prescribed by statutory obligations. Obligations to store data arise out of accounting law, civil law and tax law. According to these laws, business communications, concluded contracts and accounting vouchers must be stored for up to 10 years. If we no longer need this data to carry out the services for you, the data will be blocked. This means that the data may then only be used for accounting and tax purposes.

### **9. Will my data be disclosed to other third parties?**

For the development and operation of the App, we work closely with Creative Dock, s.r.o. Zubatého 295/5, 150 00 Praha 5, Czech Republic, who work according to our instructions.

If you choose to share data with Data Consumers, they will be provided with data in aggregated or pseudonomised form. However, they may be able to identify you from that information. During the testnet phase, the data you choose to share will be provided to VETRI, who will be able to identify you from it. **You are obliged to read and accept the privacy policy of each Data Consumer with whom you decide to share your personal data through the App.**

Other than the above, we only disclose your personal data to other third parties if you have expressly consented, if there is a legal obligation to do so or if this is necessary to enforce our rights, in particular to enforce claims arising from the contractual relationship. In addition, during this testnet phase, we may disclose your data to third parties such as our affiliates, collaborators or partners insofar as this is necessary for the development or the use of the App.

#### **10. Do we transfer personal data outside the EU and Switzerland?**

We are entitled to transfer your personal data to third parties (Data Consumers) outside the EU if you so choose. Data Consumers may be located in a country that does not protect personal data in the same way as in the EU or Switzerland. Most countries outside the EU and Switzerland do not have an adequate level of data protection. **It is your responsibility to satisfy yourself that Data Consumers will ensure the protection of your personal data.**

If the level of data protection in a country does not correspond to that in Switzerland or Europe, we will contractually ensure that the protection of your personal data for our processing activities corresponds to that in Switzerland or Europe at all times.

#### **Anything else you need to know?**

##### **11. You have a right of access, rectification, deletion and limitation of the processing as well as of data transferability**

You have a right to request information about the personal data that we store about you. In addition, you have a right to correct incorrect data and a right to request deletion of your personal data, insofar as there is no legal obligation to retain such data and no legal basis for further processing the data.

You also have a right to request the data that you have provided to us. Upon request, we will transfer your data to a third party of your choice (right to data portability). You have a right to receive the data in a common file format.

You can contact us for the above-mentioned purposes via [privacy@vetri.global](mailto:privacy@vetri.global). In order to process your requests, we may request proof of your identity.

In many countries, you also have the right to file a complaint with the relevant data protection authority if you have concerns about how we process your data.

These rights depend on the applicable data protection legislation and may be either more limited or more comprehensive.

##### **12. Is your data safe with us?**

We use suitable technical and organisational security measures to protect your personal data stored with us against manipulation, partial or complete loss and against unauthorised access by third parties. Our security measures are continuously improved in line with technological developments.

You must always treat your access data confidentially, especially if you share your device, tablet or smartphone with others. If you do not do so, we may have claims against you for damages caused by breach of your confidentiality obligations to us. We do not store your access data for the App, so if you forget that access data and the recovery phrase we are unable to re-set your log-in details and you will need to reinstall the App. If this happens, the data that you have stored in the Data Vault will become inaccessible.

We also care about data protection internally. Our employees and service providers are contractually obliged to ensure confidentiality of personal data and compliance with applicable data protection laws. Only qualified and a limited number of personnel will be able to access your personal data.

### **13. Is the same protection provided when data is transferred to the USA?**

For the sake of completeness, for users residing or domiciled in Switzerland, the EU or the EEA, we would like to point out that in the USA there are surveillance measures by US authorities which allow them to gain access to all personal data that has been transferred from Switzerland to the USA. This is done without differentiation, limitation or exception based on the objective pursued and without any objective criterion that would allow limiting the access to the data and subsequent use thereof by US authorities. In addition, we would like to point out that in the USA there are no legal remedies available for the persons concerned from Switzerland that would allow them to gain access to the data concerning them or to obtain its correction or deletion, and that there is no effective legal protection against general access rights of US authorities. We explicitly draw your attention to this legal and factual situation in order to enable an informed decision to consent to the transfer of your data to Data Consumers.

### **14. Which law do we apply? And where does the law apply?**

This privacy policy and the contracts concluded on the basis of or in connection with this policy are subject to Swiss law, unless the law of another country is mandatory. The place of jurisdiction shall be Zurich, Switzerland, unless another place of jurisdiction is mandatory.

### **15. Can this policy be amended?**

Due to the ongoing development of our App and possible future changes to the statutory requirements, it may become necessary to amend this privacy policy. The most current privacy policy is published on our App.

Should individual parts of this privacy policy be invalid, this shall not affect the validity of the rest of the privacy policy. The invalid part of this privacy policy shall be replaced in such a way that it comes as close as possible to the economically intended purpose of the invalid part.

## **16. Questions about data protection? Please, contact us!**

This page was last modified on 03.12.2019. If you have any questions or comments about our legal notices or data protection, please contact us at [privacy@vetri.global](mailto:privacy@vetri.global).