

PRIVACY POLICY

(in force from August 27, 2022)

Dear User!

Every day we make sure that the use of our Websites is comfortable and safe for you. For this reason, we provide you with important information about how the data we collect during your use of our websites is processed.

We know how important privacy and safety are to you and that's why in the Privacy Policy we explain what rights you have, which of your data we collect and why, and how we use it, so you can be sure that it is safe with us.

The Privacy Policy contains the following chapters:

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I. GENERAL INFORMATION REGARDING PRIVACY POLICY.

1. The purpose of the Privacy Policy of our Websites is primarily to explain to you what type of information we are gathering from you and why. Here we will specify what data we collect, where it comes from, where it goes, and what rights you have in relation to it.
2. This Privacy Policy was made on the basis of:
 - a) The Data Protection Act, 2021 ("**DPA**") that came into force on 9 July 2021 in the British Virgin Islands;
 - b) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC ("**GDPR**").
3. To ensure the security of your personal data, we have ensured that all our employees and contractors are properly trained in the processing of personal data. In addition, we guarantee that our Company has adequate technical security and organizational measures to properly secure the data.
4. Personal data we collect is processed in accordance with the law, only for specified, legally permitted purposes.
5. In addition, we put our effort to make sure that the data collected by us is substantively correct and adequate in relation to the purposes for which it is processed and stored in a form that allows identification of persons to whom it relates, no longer than it is necessary to achieve the purpose of processing. We also maintain the security and confidentiality of the personal data collected.
6. All information processed by us may be transferred, processed, and stored anywhere in the world, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws. When we transfer personal information to countries outside the European Economic Area, we put in place appropriate safeguards to ensure that this transfer complies with the applicable laws and regulations. For more information about these safeguards, please contact us as set forth below.
7. If you feel that the processing of your personal data by us violates the law, or you are not satisfied with our response to your complaint, you have the right to submit a complaint with the supervisory body in your country that deals with the protection of personal data. If you are a European such body is for example in Cyprus:

Office of the Commissioner for Personal Data Protection

Office address: Iasonos 1, 1082 Nicosia, Cyprus

Postal address: P.O.Box 23378, 1682 Nicosia, Cyprus

Tel: +357 22818456; Fax: +357 22304565



AngelBlock

e-mail: commissionerdataprotection.gov.cy

II. WHO IS THE ADMINISTRATOR AND THE DATA PROTECTION OFFICER OF YOUR PERSONAL DATA

1. The Administrator of your personal data is AngelBlock Ltd. ("**Administrator**") – a company established in the British Virgin Islands, bearing registration number 2063256 with a registered seat at Craigmuir Chambers, Road Town, Tortola VG1110, British Virgin Islands.
2. If you have any questions, requests, or complaints regarding the processing of your personal data by us, you can contact us in writing at the address: Suite 305, Griffith Corporate Centre, Beachmont, Kingstown, St. Vincent and the Grenadines. You can contact the Administrator via mail using this address: info@angelblock.io.
3. Questions, applications, and complaints referred to in the preceding paragraphs should, in particular include:
 - a) data relating to the person or persons concerned by the inquiry or request,
 - b) the event which is the reason for sending a message to us,
 - c) requests and legal grounds for demanding requests,
 - d) the expected manner of handling the matter.
4. In this Policy, when we say Websites, we mean all our websites, their subpages, tabs, forms, etc. This includes, but is not limited to angelblock.io and nft.angelblock.io.

III. HOW AND WHY DO WE COLLECT YOUR DATA?

1. Visiting and using our Websites and providing you with our services is associated with the need to collect and process your personal data.
2. Please note, we process your personal data, in particular the data you provide us with directly when you fill out forms we provide, use our services (like the information in which country you are located, what wallet address you use), purchase our products, set up your account on our Websites (those include the data contained in the documents you send to us or to our professional third party service providers) and the data you generate using our Websites and services.
3. We need to collect such a wide range of information not only to be able to provide our services "technically", and to optimize our services to your needs but also to fulfill the binding legal provisions regarding the obligation to identify the client, to monitor, combat and assess the risks of fraud, money laundering and financing of terrorism. Therefore, if you do not provide the data requested or if the data proves to be false, or if you object to its processing, we will not be able to continue to provide you with some of our services.



4. If you express a wish to use additional services offered by us, we will process your data which we collected to provide our services, in compliance with their description contained on the Websites, in the "terms and conditions", or provided to you separately.
5. We keep all of your information strictly confidential and use it only for the purposes for which we informed you when we collected it or in this Privacy Policy. The legal grounds for processing your data are described in detail in section IV of the Privacy Policy.
6. We have not and will not sell any of your data to any outside organization, nor we will agree to use it for tier purposes.
7. Providing your personal data is necessary in the following cases:
 - a) to use the full functionality of a user account on our Website;
 - b) to provide services you want to use;
 - c) to efficiently inform you about topics and issues you inquired about;
 - d) to respond to inquiries addressed to us;
 - e) to adjust our services to your needs;
 - f) to provide the newsletter service, if you want to be informed on an ongoing basis about what is up with us and what news we have prepared for you, you can become a subscriber to our newsletter, subscription is voluntary and you can unsubscribe from it at any time;
 - g) to comply with the terms and conditions of our services and binding provisions of law, including prevention of money laundering, fraud, terrorist financing, and other illicit activities.
8. Personal data is processed by our Company primarily in order to provide you with the services you ordered and any additional features within our Websites. However, we would like to emphasize that as Administrator we take care to observe the principle of minimizing and we process only those categories of personal data that are necessary for us to achieve these goals.
9. As part of a minimization principle every time attaching the data to your person is not necessary we anonymize it in aggregated databases. This especially happens when we collect data regarding the way our Websites are used, measure the efficiency of our marketing, and our user experience.
10. Each person using our Websites has a choice whether, and if so, to what extent they want to use our services and what data about themselves they want to share with us within the scope of this Privacy Policy.
11. When you contact us to perform various activities or to obtain information (e.g. to submit a complaint) using the Websites, e-mail, or any online communicator, we will again require you to provide us with your personal data to confirm your identity and

the possibility of return contact. However, it may happen that due to the nature of your request, we will have to collect other data from you. Provision of the above data is not mandatory, but it is necessary to perform activities or obtain information that interests you. We will process the above-mentioned data to perform the actions requested by you or to provide you with the information that you requested - depending on which situation takes place.

IV. ON WHAT BASIS DO WE PROCESS YOUR DATA?

1. Your personal data is always processed on one of the following legal basis:
 - a) your consent – in the scope resulting from this consent e.g. newsletter subscription, consent is voluntary and the consent to the processing of personal data can be withdrawn at any time, we enforce this basis if other grounds for the processing of your personal data do not apply, e.g. concluded contract or legal obligation;
 - b) an agreement concluded between you and us (regarding keeping an account on our Websites, sending a Newsletter, mailing) – in the scope necessary for its execution;
 - c) taking action on the request, before concluding a contract - if you asked us a question before creating a user account, we do not need additional consent to contact you back and answer your questions;
 - d) legal obligation, i.e. an obligation arising from legal acts – in the scope necessary to comply with the binding provisions;
 - e) our legitimate interest.
2. If we process your personal data based on the consent referred to in point 1.a) above, the data you provide is used only for the purposes covered by your consent. Based on this we will primarily carry out information and marketing campaigns. Remember that at any time you can change your mind and withdraw your consent - just send us an e-mail. Please note, however, that this does not always involve the deletion of your personal data. We may still process your personal data if it is necessary, e.g. if we have another legal basis for processing your personal data (concluded contract) or if we have a legitimate legal obligation to do so.
3. We will also process your data to execute the agreement we entered into with you to be able to properly provide you with the services you want.
4. Whether you have given us your consent for the processing of your personal data or we are bound with you by a contract, we will also have to process your data due to the need to comply with our legal obligations.
5. Based on our legitimate interest, we will process your data to claim our rights and defend ourselves against claims, for evidentiary and archival purposes. On the same

basis, we will also process your personal data collected automatically on the Websites in order to ensure the security and quality of the session, and provide you with all the functions of the Website. On this basis, we will also process your personal data for analytical purposes, which will involve the examination and analysis of traffic on our Website.

6. The Websites are not intended for children below 18 and we do not knowingly collect or solicit personal information from anyone under the age of 18 or knowingly allow such persons to use our Websites. If we become aware that we have collected personal information from a child under age 18, we will take steps to remove that information. If you have any reason to believe that an individual under the age of 18 has shared any information with us, please contact us.

V. WHAT ARE THE CONSEQUENCES OF NOT PROVIDING US WITH YOUR DATA?

1. Not providing us with the required data will result in the fact that we will not be able to render certain services for you in full, in part, or just inefficiently.
2. Giving us your consent to the processing of your personal data is voluntary. If you do not give us your consent (or withdraw it), then we will not take any actions that a given consent applies to.

VI. HOW AND WHICH OF YOUR DATA DO WE SHARE WITH OTHER ENTITIES?

1. You should be aware that as long as we do not share your personal data without your express consent, your personal data may be entrusted to other entities for processing. This is because, without such entrustment of your personal data, our company would not be able to conduct its business and provide services to you through our Website.
2. Processing entities means professional third parties we cooperate with in running our business activity.
3. First of all, we entrust your personal data for processing to such entities as:
 - a) entities involved in the sending messages like e-mails – to send messages for which you have given your consent (like SendX Inc. or MailChimp);
 - b) entities specializing in data collection for analytics, optimization, and marketing purposes (like Alphabet Inc. with their Google Analytics tools)
 - c) entities providing marketing services – so we can provide you with desirable and accessible content;
 - d) entities providing hosting services for the Websites - so that you can use our Websites, services we provide, create a user account, and contact us in case of any questions;



- e) entities providing IT services for the Websites thanks to which our Websites and your user account can function efficiently, this way we also remove all types of failures, defects, and technical interruptions in the functioning of our Website;
 - f) postal, courier, and freight service providers - for the delivery of parcels - if you choose to participate in our contest or affiliate program, it is necessary for you to receive the prize;
 - g) entities providing accounting services - to keep the accounting books of our company;
 - h) entities verifying the authenticity of your data and documents that you provided to us - to carry out a procedure of proper identification of your identity;
 - i) entities assessing the risk of illicit activities (fraud, money laundering, breaching of international sanctions, etc.) - to assess that risk;
 - j) entities that provide other services to us that are necessary for the day-to-day operation of the Websites.
4. When sharing your personal data we make sure that the entities we cooperate with ensure the implementation of technical and organizational measures and process them in accordance with applicable regulations, including the provisions of the GDPR.
 5. The fact that we entrust the processing of some of your personal data to third entities does not mean that we lose control over it. You can still exercise your rights set out in this Privacy Policy (section IX). We make sure that they are used in accordance with the law and only to the extent to which we entrusted their processing to these entities.
 6. Also note that we may be obliged by law to share your data with legal authorities upon their legitimate, verified requests or with any third parties - this includes future implementation of so-called "travel rule" (although we will take extra care in such cases to comply only with the undisputed or commonly accepted interpretation of such regulations, taking into consideration decentralized and non-custodial character of our services).

VII. HOW LONG DO WE KEEP YOUR DATA?

1. We store and process your data only as long as it is necessary for the purpose for which it was obtained.
2. You should be aware that your personal data may be processed by us for a longer period than indicated above. This is due to the obligations imposed on us and specific legal provisions.
3. If the basis for processing your data is:
 - a) your consent - this period lasts until you withdraw your consent or until the expiry of your consent (e.g. when the consent concerned a service that we no longer



- provide), if further processing of your personal data is not imposed by any legal regulations;
- b) the need to execute an agreement you concluded with us - this period lasts until the agreement is terminated;
 - c) legal obligation – your personal data will be processed for as long as we are under a legal obligation to do so in accordance with specific legal provisions;
 - d) pursuit of our legitimate interest - until such interest persists.
4. Please, note that the basis for the processing of your personal data for a certain period of time is primarily due to special regulations. Therefore, even though you withdraw your consent, the contract that linked us will be terminated or simply expire, in some cases, we are still required to process your personal data.
5. For example:
- a) data provided for account registration on the Websites will be stored for as long as your account will be kept - that is, until you do not cancel it or request it to be closed unless further processing of your personal data is necessary to comply with our legal obligation;
 - b) data provided for token sales will be processed for as long as all the tokens will be delivered to you and then stored as long as we are legally required;
 - c) data provided for the Newsletter or other mailing will be kept until your consent for their delivery is valid;
 - d) if you gave consent to our other products, events, and other activities we organize - your data necessary for performing such activities will be kept until you withdraw your consent or the activities will be concluded.
6. Since some of our services may be subject to AML / KYC regulations, we may be obliged to keep for at least five years from the end of our economic relations with you (i.e. from the final closing and settlement of the account), some of your personal data including:
- a) copies of documents and information obtained in connection with the verification of your identity;
 - b) copies of documents and information being the basis for assessing the risk of fraud in relation to your transactions;
 - c) evidence confirming your transaction and transaction records, including wallet addresses you used.
7. The retention period of your data required by law may be subject to change as the applicable law changes.
8. After the indicated time periods expire, your personal data will be deleted or anonymized in a way that prevents the data from being attributed to you.

VIII. YOUR RIGHTS

1. In connection with the processing of your data by us, you have a number of rights, which we inform you about in this section. You can exercise them, as well as obtain more information in this regard, by contacting us at the e-mail or correspondence address indicated on the Websites and the Privacy Policy (section II). Contacting us, remember to give us:

- a) data of the person or persons concerned by the request or question,
- b) the event which is the reason for sending a message to us,
- c) your requests and the legal basis for its requests,
- d) the expected manner of handling the matter.

This will help us to respond more efficiently to your questions and requests.

2. Due to the processing of your data by us, you have:

- a) The right to be informed about the processing of personal data - the Administrator is obliged to inform you about the fact that your personal data is being processed, for what purpose, indicate the appropriate legal basis for the processing, the period of processing and other information, including whether your personal data is being transferred or made available to third parties, in addition, the Administrator is obliged to indicate its contact data and data of the Data protection officer (if appointed), the such obligation must be fulfilled at the time of collecting personal data, that is why we have created this Privacy Policy.
- b) The right to request access to your personal data - both the data you shared with us and which we are processing, as well as the data generated in the course of our cooperation (e.g. history of your activity on the Website).
- c) The right to request immediate correction or upgrading of your personal data by us if it is incorrect.
- d) The right to complete incomplete personal data, including through the presentation of an additional statement (considering the purposes of processing).
- e) The right to immediately delete your data ("the right to be forgotten"); - in such a case we will delete your data immediately (however, we will keep the data we must keep in compliance with the law).
- f) The right to request processing restrictions.
- g) The right to receive data you provided to us in a structured commonly used format suitable for machine reading and to send it to another administrator.
- h) The right to the right to transfer your personal data - you may demand that we transfer your data to another administrator of your choice, we may satisfy your request if you have given us your consent to the processing of your personal data.

- i) The right to object to the processing of your personal data for the needs of direct marketing which will cease the processing of your data for the purposes of direct marketing.
 - j) The right to object due to causes related to your particular situation if your personal data is processed based on a legally justified interest. However, we will keep processing your personal data in the necessary scope if there is a particular justified reason for that for us – we will inform you about this in such a case.
 - k) If the basis for the processing of your personal data is your consent, you will have the right to withdraw such consent at any time. Withdrawal of your consent does not affect compliance with the law of processing of your personal data by us carried out based on the consent before its withdrawal.
 - l) Filing a complaint to the supervisory body - If you feel that the processing of your personal data by us violates the law, you can file a complaint to the supervisory body that deals with the protection of personal data.
3. You can submit a statement regarding the exercise of any of your rights mentioned above via e-mail: info@angelblock.io.
 4. Withdrawing your consent or objecting to the processing of data, if you do not formulate any other objections, will affect all our services and Websites and the entities entrusted with the processing of your data.
 5. Withdrawal of consent to the terms of the Terms and Conditions and Privacy Policy will involve deleting your account on the Websites and deleting personal data provided by you.

IX. COOKIES

1. Our Websites use Cookies technology in order to adapt their operation to your individual needs. According to this, you may consent to the storage of the data and information entered by you, so that it can be used for future visits to our Websites without the need to re-enter it. The owners of other websites will not have access to this data and information. However, if you do not agree to personalize the Websites, we suggest disabling the use of cookies in the options of your Internet browser.
2. Cookies are small text information in the form of text files, sent by the server and saved on a device of the person visiting the Websites (e.g. on the hard drive of the computer, laptop, or on the smartphone's memory card - depending on which device you use).
3. The Administrator may process data contained in Cookies when users use the Websites for the following purposes:
 - a) identification of users as logged in to the Websites and showing that they are logged in;

- b) remembering data from completed forms, surveys, or login data to the Website;
 - c) adjusting the content of the Websites to individual preferences of users (e.g. regarding colors, font size, page layout) and optimization of the use of the Website;
 - d) keeping anonymous statistics presenting how and by who (e.g. geographic location) the Websites are used;
 - e) displaying individualized advertisements for the Websites user, according to preferences;
 - f) better optimization of the functioning of the Website.
4. By saving cookies, the device records the activity of the Websites user and it is thanks to this that the Websites displayed by the user are individualized, according to his preferences.
 5. As a standard, most web browsers available on the market accept cookies by default. Everyone can define the terms of using cookies through their own browser's settings. This means that you can, for example, partially restrict (e.g. temporarily) or completely disable the option of saving cookies - in the latter case, however, it may affect some of the Website's functionalities.
 6. Detailed information on changing cookies settings and their removal in the most popular web browsers is available in the help section of the web browser you use.
 7. The Administrator also processes anonymized operational data related to the use of the Websites (so-called logs, domain) to generate statistics helpful in administering the Website. For this purpose, we use the services of third parties. Data processed by these entities is aggregated and anonymous, i.e. it does not contain features identifying visitors to the Websites.

X. HOW DO WE SECURE YOUR DATA?

1. We ensure an optimal range of organizational measures in a manner that ensures its proper protection, in particular:
 - a) secure the possibility of collecting, copying, and disclosing personal data to unauthorized persons;
 - b) protect personal data, databases, and devices on which personal data are processed from loss, damage, or destruction.
2. We store, use and transmit your data in a manner that ensures its proper protection, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage, using appropriate technical and organizational measures.
3. We have implemented a number of security measures to ensure that your information will not be lost, used, or changed. Our data security measures include, among others: PCI scanning, encryption, pseudonymization, data backup, regular

testing, measuring and assessing the effectiveness of security measures used, restrictions on access to internal data, and strict physical controls of access to buildings and files.

4. Access to data processed by us is carried out through an internal network, secured by our certificates and keys, thus excluding third-party access "from outside" as well as "our" unauthorized persons.
5. To secure your data, we have developed and are constantly improving our own original script that encrypts data.
6. When we store your data on internal servers, we do it through entities that guarantee the security of the infrastructure offered (PCI-DSS certification, ISO / IEC 27001 certification, SOC 1 TYPE II and SOC 2 TYPE II certificates, etc.), who have a good opinion, and their services are used by other entities processing personal data of special importance. For this reason, the servers used by us are located in different places in the European Union.
7. Regardless of the above, please remember that it is impossible to guarantee 100% secure data transmission over the Internet or electronic data storage methods. Therefore, we ask that you also take reasonable precautions to protect your personal data. If you suspect that your personal information has been compromised, in particular, the account or password information has been disclosed, contact us immediately.
8. Detailed IT solutions protecting your data are confidential, making it difficult to break them.

XI. PROCEDURE TO CHANGE THE PRIVACY POLICY

Our services will change with time and they will be adjusted to the identified demand and changes in our operational capacity. Technologies, standards, and legal requirements related to the provision of services offered by us will also change. This means that in the future we will be able and sometimes we will be forced to introduce modifications in the Privacy Policy. With each change, a new version of the Privacy Policy will be available on the Websites with a relevant message and it will apply in its new wording from the day of the notification about its change. Significant changes in the Privacy Policy will be sent directly to your e-mail address if you provided it.