

# Privacy Policy

We value and respect your right to privacy, and to this end are committed to protecting your personal data provided to us directly or indirectly. This Privacy Policy sets out our commitment and explains in detail what information we may gather from your visit to our Platform and, why and how your personal data may be processed when you use our Services.

This policy (the **Privacy Policy**) outlines how we collect, use, store and disclose your personal data. Please take a moment to read about how we collect, use and/or disclose your personal data so that you know and understand the purposes for which we may collect, use and/or disclose your personal data. By accessing the website at <https://arcana.network/> (the **Website**), you agree and consent to Arcana (the **Company**), its related corporations, business units and affiliates, as well as their respective representatives and/or agents (collectively referred to herein as Arcana, using, disclosing and sharing amongst themselves the personal data, and to disclosing such personal data to relevant third-party providers. This Policy supplements but does not supersede nor replace any other consent which you may have previously provided to us nor does it affect any rights that we may have at law in connection with the collection, use and/or disclosure of your personal data. We may from time to time update this Policy to ensure that this Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, the prevailing terms of this Policy shall apply. For the avoidance of doubt, this Policy forms part of the terms and conditions governing your relationship with us and should be read in conjunction with such terms and conditions.

This Policy describes how Arcana may collect, use, disclose, process and manage your personal data, and applies to any individual's personal data which is in our possession or under our control.

## 1. What personal data is collected by Arcana?

“Personal data” means data, whether true or not, about an individual who can be identified (i) from that data, or (ii) from that data and other information to which the organisation has or is likely to have access. Some examples of personal data that Arcana may collect are:

- (a) personal particulars (e.g., name, contact details, residential address, date of birth, identity card/passport details, social media handles and other social media profile information, and/or education details);
- (b) financial details (e.g., income, expenses, credit history and/or credit card and bank information);
- (c) images and voice recordings of our conversations with you, whether from our events or office surveillances or otherwise;
- (d) work experience and employment details (e.g., occupation, directorships and other positions held, employment history, salary, and/or

- benefits);
- (e) tax and insurance information;
- (f) information about your use of our services and Website;
- (g) usernames and password, third party account credentials (such as your Facebook login credentials, Google login credentials) and IP address;
- (h) banking information (e.g., account numbers and banking transactions);
- (i) private or public cryptographic key relating to addresses on distributed ledger networks and/or similar information; and/or
- (j) personal opinions made known to us (e.g., feedback or responses to surveys).

Personal data may be collected when you interact with our services or use the Website, or may be received by Arcana from third-party databases or service providers that provide business information.

2. **Collection of Data:** Your data is collected either directly from you, or offline/online, including through the Platform. The data comprises of:
  - (i) **Personal Data:** We may ask for data related to your identification that can be used to contact or identify you (“**Personal Data**”). Personal Data will include, among others, your name, profile picture, email address, phone number, payment card details, virtual currency accounts, royalties and fees, login data etc.
  - (ii) **Usage Data:** We may collect information about how you use the Platform, the Services and other offerings made available by us (“**Usage Data**”), including your computer’s Internet Protocol address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.
  - (iii) **Tracking Cookies Data:** We may use cookies and similar tracking technologies on our Platform to store your information/preferences. You can refuse to accept any cookies, but in such a case you may not be able to use a certain portion of the Services or Platform.

### 3. Personal data and the Blockchain

**3.1** Blockchain technology, also known as distributed ledger technology (DLT), is at the core of our business. Blockchains are decentralized and made up of digitally recorded data in a chain of packages called “blocks”. The manner in which these blocks are linked is chronological, meaning that the data is very difficult to alter once recorded. Since the ledger may be distributed all over the world (across several “nodes” which usually

replicate the ledger) this means there is no single person making decisions or otherwise administering the system (such as an operator of a cloud computing system), and that there is no centralized place where it is located either.

Accordingly, by design, a blockchain's data cannot be changed or deleted and is said to be "immutable". This may affect your ability to exercise your rights such as your right to erasure ("right to be forgotten"), or your rights to object or restrict processing of your personal data. Data on the blockchain cannot be erased and cannot be changed. Although smart contracts may be used to revoke certain access rights, and some content may be made invisible to others, it is not deleted.

**3.2** In certain circumstances, in order to comply with our contractual obligations to you (such as delivery of tokens or provision of other Services) it will be necessary to collect certain personal data, such as your wallet address, onto the blockchain; this is done through a smart contract and requires you to execute such transactions using your wallet's private key.

**3.3** The ultimate decisions to (a) transact on the blockchain using your wallet address, as well as (b) share the public key relating to your wallet address with anyone (including us) rests with you. **IF YOU WANT TO ENSURE YOUR PRIVACY RIGHTS ARE NOT AFFECTED IN ANY WAY, YOU SHOULD NOT TRANSACT ON BLOCKCHAINS AS CERTAIN RIGHTS MAY NOT BE FULLY AVAILABLE OR EXERCISABLE BY YOU OR US DUE TO THE TECHNOLOGICAL INFRASTRUCTURE OF THE BLOCKCHAIN. IN PARTICULAR THE BLOCKCHAIN IS AVAILABLE TO THE PUBLIC AND ANY PERSONAL DATA SHARED ON THE BLOCKCHAIN WILL BECOME PUBLICLY AVAILABLE.**

#### **4. Disclosure of Data:**

**4.1** For the provision of the Services and as set out under this section 4, you understand and accept that we may use and/or disclose your Personal Data for its legitimate interests or business purposes, including operations for these purposes. These may include, without limitation, the following:

- (i) services relating to a decentralized cloud storage platform, including provision of storage and bandwidth,
- (ii) services providing third party developers a suite of tools for storage, identity and access management privacy and data ownership, encryption and security, transparency and public verifiability,
- iii) sharing with third party service providers for provision of the Services, including data storage, web hosting and server providers, debt collectors, professional advisors and payment systems operators,

- (iv) disclosure to our employees, contractors and/or related entities for the purpose of the Services,
- (v) disclosure to our existing or potential agents or business partners,
- (vi) sponsoring or promoting of any competition we run,
- (vii) disclosure to anyone to whom our business or assets are, or may be, transferred,
- (viii) disclosure to credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you,
- (ix) disclosure to courts, tribunals, regulatory authorities and law enforcement officers, as required by law, or in order to establish, exercise or defend our legal rights,
- (x) disclosure to third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you,
- (xi) disclosure to third parties to collect and process data, such as Google Analytics or other relevant businesses,
- (xii) operate and maintain the security or integrity of the Services, including to prevent or stop an attack on our computer systems or networks,
- (xiii) protect the rights, interests, or property of our or third parties,
- (xiv) prevent or investigate possible wrongdoing in connection with the Services, or
- (xv) enforce our T&C.

**4.2** We may disclose aggregated, anonymized information about our users without restriction.

We may disclose personal information that we collect or you provide as described in this notice:

- (i) To fulfil the purpose for which you provide;
- (ii) For any other purpose with your consent;
- (iii) To comply with any court order, law or legal processes, or to enforce or apply our terms of use or other agreements between you or your organisation and us, or;
- (iv) For any other purpose disclosed by us when you provide the information;
- (v) If we believe disclosure is necessary or appropriate to protect the rights, property or safety of Arcana or its personnel, customers, or others.

5. **Sensitive Personal Information (“SPI”)**: SPI is Personal Data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person’s sexual orientation. SPI may only be used and disclosed for purposes for which the SPI was collected, as permitted by the provider of the SPI and if required by law.

## 6. Information Automatically Collected

**6.1.** We automatically collect certain types of usage information when you visit our website or use our Service. When you visit the Service, we may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets us help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Service (e.g., the pages you view, the links you click and other actions you take on the Service), and allow us to track your usage of the Service over time. We may collect log file information from your browser or mobile device each time you access the Service. Log file information may include anonymous information such as your web request, Internet Protocol (“IP”) address, browser type, identity of your internet service provider, information about your mobile device, referring / exit pages and URLs, the number and duration of page views, number of clicks and how you interact with links on the Service, domain names, landing pages, and other such information.

**6.2.** When you access our site through a mobile device, we may receive or collect and store a unique identification number associated with your device and other device information. We may also employ clear gifs (also known as web beacons) which are used to anonymously track the online usage patterns of our Users. In addition, we may also use clear gifs in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service. These tools collect information sent by your browser or mobile device, including the pages you visit, your use of third-party applications, and other information that assists us in analysing and improving the Service.

## 7. Place of processing

The Data is processed at the operating offices and in any other places where the parties involved in the processing are located.

Depending on the User’s location, data transfers may involve transferring the User’s Data to a country other than their own.

Users are also entitled to learn about the legal basis of Data transfers to

a country outside their jurisdiction or to any international organisation governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

#### **8. Retention Time of the data collected**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore, Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.

Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfil such purposes.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

#### **9. The Website uses cookies**

A cookie is a small text file placed on your computer or mobile device when you visit a Website or use an app. Cookies collect information about users and their visit to the Website or use of the app, such as their Internet protocol (IP) address, how they arrived at the Website (for example, through a search engine or a link from another Website), how they navigate within the Website or app, browser information, computer or device type, operating system, internet service provider, website usage, referring/exit pages, platform type, date/time stamp, number of clicks, and ads viewed. We use cookies and other technologies to facilitate your internet sessions and use of our apps, offer you products and/or services according to your preferred settings, track use of our websites and apps and to compile statistics about activities carried out on our websites.

You may set up your web browser to block cookies from monitoring your website visit. You may also remove cookies stored from your computer or mobile device. However, if you do block cookies you may not be able to use certain features and functions of our web sites.

#### **10. Data Security:**

Without prejudice to the inherent risk of sharing and\*\* \*\*accessing data over the internet, we will use appropriate security measures (organisational and technical) to prevent your Personal Data from being accidentally lost, used, damaged, or accessed in an unauthorised or unlawful way, altered, or disclosed. In addition, we will allow access to your Personal Data only to those employees, agents, contractors and other third parties who have a legitimate business need to know and are subject to a duty of confidentiality. Despite the fact that we have implemented appropriate security measures, we cannot guarantee that the Personal Data we collect will not be shared/disclosed in a way that is inconsistent with this Privacy Policy.

**Data Retention:** We will retain your Personal Data if you are using the Services, have an account with us or required for the purpose provided in this Privacy Policy. Further, we may retain Personal Data for an additional period permitted or required under applicable laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

**Your Rights:** This Privacy Policy grants you certain rights with respect to your Personal Data as set out below:

- (i) **Right to Consent:** By using our Services and/or providing your Personal Data, you agree to allow us to collect, hold, use, and disclose such data in accordance with this Privacy Policy. You have the right not to consent/provide us any such data, however, if you do so, we may not be able to provide you with the Services, or the products and/or services offered through the Platform.
- (ii) **Anonymity:** We will allow you the option of not identifying yourself or using a pseudonym, where practicable.
- (iii) **Access:** You have the right to request details of your Personal Data from us.
- (iv) **Data Erasure.** You can request for deletion of your Personal Data. However, if such data is required for the provision of the Services, you may be required to delete your profile and/or may not be able to use our Services.
- (v) **Correction:** If you believe any Personal Data held by us is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us to correct such information, or update the same via your account, if allowed.
- (vi) **Concerns and Queries:** If you have any concerns and queries on how we process, handle, and keep your Personal Data, please contact us with full details of your concerns and queries. We will take appropriate steps to address them.
- (vii) **Unsubscribe:** To unsubscribe from our e-mail or to opt-out of any communications, please contact us at the address provided in this Privacy Policy or where available, use opt-out option.

## 11. Additional Rights

### 11.1 General Data Protection Regulation (GDPR) Data Protection Rights

The company invites you to be fully aware of all your personal data protection rights if you are a resident where the GDPR is applicable. Every such consumer is entitled to the following:

- (a) **The right to access** - the consumer has the right to request copies of your personal data. The company may charge additional costs for the same.
- (b) **The right to rectification** - the consumer has the right to request that we correct any information you believe is inaccurate. the consumer additionally has the right to request that we complete the information the consumer believes is incomplete.
- (c) **The right to erasure** - The consumer has the right to request that the company erases your personal data, under certain circumstances.
- (d) **The right to restrict processing** - The consumer has the right to request that the company restricts the processing of your personal data, under certain circumstances.
- (e) **The right to object to processing** - The consumer has the right to object to the company's processing of your personal data, under certain circumstances.
- (f) **The right to data portability** - The consumer has the right to request that the company transfers the data that the company has collected to another company/ organisation, or directly to you, under certain circumstances.

If the GDPR is applicable to you, you may make a request, and the Company will endeavour to respond to you within the timeline as per applicable law.

### 11.2 Personal Data Protection Commission, Singapore

The company invites you to be fully aware of all your personal data protection rights if you are a resident where the PDPC is applicable. We as the company are fully compliant of the regulations given in chapter 8 of the PDPC.

## 12. Queries, Access/Correction Requests and Withdrawal of Consent

If you:

- (a) have queries about our data protection processes and practices;
- (b) wish to request access to and/or make corrections to your personal data in our possession or under our control; or



(c) wish to withdraw your consent to our collection, use or disclosure of your personal data,

please submit a written request (with supporting documents, (if any) to our Compliance Officer at [compliance@arcana.network](mailto:compliance@arcana.network). Our Compliance Officer shall endeavour to respond to you within 30 days of your submission. Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our services or products to you or administer any contractual relationship in place. Such withdrawal may also result in the termination of any agreement you may have with us. Our legal rights and remedies are expressly reserved in such an event.

We may charge you a fee for processing your request for access. Such a fee depends on the nature and complexity of your access request. Information on the processing fee will be made available to you.

13. **Links to Other Sites:** The Platform may contain links to other websites. Those websites are not governed by this Privacy Policy. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. Please read the Privacy Policy and Terms and Conditions of such websites before using such websites. We have no control over and shall not be responsible for the content, privacy policies or practices of any third-party sites or services.
14. **Changes to our Privacy Policy:** We reserve the right to update this Privacy Policy at any time and at our sole discretion. Any changes to or modifications of this Privacy Policy shall be in effect as of the “Last Updated Date” referred to at the top of this page. We will notify you of such changes prominently either by posting a notice of such changes before they take effect, or by sending you a notification directly. The amended Privacy Policy is effective once we notify you of the change. We encourage you to periodically review this Privacy Policy.
15. **Minor:** As provided in our T&C, our Service is not intended for anyone under the age of 18 or minor under the law of the country where the Services are accessed (“**Minor**”). We do not intend to or knowingly collect any Personal Data related to a Minor. If you believe that Personal Data of any minor has been collected or provided to us, please contact us.
16. **Contact Details:** For queries on any aspect of this Privacy Policy or to provide any feedback please contact our office at:[hello@arcana.network](mailto:hello@arcana.network)

**(Last Updated: 21st Dec 2022)**