

# **ELASTOS FOUNDATION PRIVACY POLICY**

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EF deeply respects your concerns for privacy, and understands that crypto-currency and its community is built around security and privacy. Therefore, this privacy policy (“Privacy Policy”) describes the type of information we collect, how we use this information and whom we share it. Based on the community services we provide and in accordance with the EU General Data Protection Regulation (“GDPR”), we *may* be deemed both a data processor and a data collector. The phrase “personal information” refers to information by which you or the device you are using to connect to the Internet can be identified. If at any point you have any questions regarding this Privacy Policy please contact us via email at the address listed in Section 10. Contact Information.

## **1. PURPOSE, USE AND PROCESSING OF YOUR PERSONAL INFORMATION.**

Elastos is the world’s leading provider of open-source solutions, employing not only blockchain technology, but a peer-to-peer network for communication, decentralized data storage services, and a decentralized ID system for all users and digital assets. Elastos was originated by the Elastos Foundation. Elastos Foundation is a non-profit organization and the services Elastos provides allow developers to create applications that protect user privacy and ownership rights by returning control of their personal data.

In addition to our main vision statement, we may use your personal information, sometimes combined with non-personal information, in the following ways:

- To identify you when you visit our website.
- To provide the products, information, and/or services you request.
- To improve and personalize your experience with us.
- To conduct analytics and solve problems.
- To respond to your inquiries related to development support, tasks, projects, employment, or other requests.
- To send marketing and promotional materials, including information relating to our platform, products, services, newsletters, or tips.
- In some instances, to provide you with advertisements.
- For internal administrative purposes, as well as to manage our relationship with you.

## **2. TYPES OF INFORMATION WE COLLECT.**

Personal Information means information that allows someone to identify or contact you. Non-personal information means information that does not directly identify you. We collect both types of information about you.

The following provides examples of the types of data that we collect from you and how we use the information.

Context	Types of Data and Purpose for Collection
Demographic Information	We may collect personal information from you, such as your location.
Experience, Skill Sets and Languages	You may provide and have us collect personal information regarding your experience and employment for certain subject matter knowledge, skill sets and spoken languages for Elastos and any other blockchain frameworks.
Email Interconnectivity	If you receive email from us, we may use certain tools to capture data related to when you open our message or click on any links or banners it contains.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and e-mail address and possibly other personal information, as well as any other content that you send to us in order to reply.
Mailing List	When you sign up for one of our mailing lists we may collect your email address or postal address.
Online Forms and Submissions	We collect information you submit to us on our website or through online forms to process your requests.
Surveys	When you participate in a survey we may collect additional information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information. Unless expressly indicated on the face of the survey we do not use survey information to market products or services to survey participants. If you are provided a separate privacy policy on part of a survey or study, the terms of that policy shall govern your information.
Third Party Tracking	Our website may participate in behavior-based advertising. This means that a third party may be allowed to use technology (e.g., a cookie) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests. If occurring, that advertising may appear either on our website, or on other websites. You can opt-out of receiving advertising based upon your browsing behavior from some network advertising companies by going to the Network Advertising Initiative and the Digital Advertising Alliance websites, <b>although to completely prevent advertising based upon your browsing behavior you should also disable the cookies on your browser.</b>

Context	Types of Data and Purpose for Collection
Web logs	We may collect information from you, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet), domain name, click-activity, referring website, and/or a date/time stamp for your visit. Web logs may be used for things like monitoring website usage levels and diagnosing problems.
Device Information	We may collect information about the device accessing the website such as MAC address, device type, and device identifiers.
Cookies	We may use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to your device while you are viewing a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device until you delete them). Among other things, cookies allow us to provide you with a more personal and interactive experience and to improve our marketing efforts. Persistent cookies may be removed by following instructions provided by your browser. If you choose to disable cookies some areas or features of our websites may not work properly.

In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources.

### 3. SHARING OF PERSONAL INFORMATION.

In addition to the specific situations discussed elsewhere in this policy, we disclose personal information in the following situations:

- **Affiliates and Acquisitions.** We may share your personal information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires our company, business, or our assets, we will also share your personal information with that company.
- **Other Disclosures with Your Consent.** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.
- **Other Disclosures without Your Consent.** We may disclose personal information in response to subpoenas, warrants, or court orders, in connection with any legal or regulatory process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action associated with possible illegal activities, suspected fraud, safety of person or property, for audit purposes, or a violation of our policies.
- **Service Providers.** We may share your personal information with service providers. Among other things service providers may help us to administer our website, conduct surveys, mail communications, and provide technical support. These service providers may collect, store, analyze, or otherwise process information on our behalf.

- **Advertising and Marketing.** We may use any statements that you communicate to us through the website regarding EF or Elastos or any of our products and services for advertising or marketing purposes.

#### 4. YOUR CHOICES.

You can make the following choices regarding your personal information:

- **Deletion of Your Personal Information.** Typically, we retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. You may, however, request that we delete your personal information. All requests must be directed in writing to the Contact Information below. We may also decide to delete your data if we believe that the data is incomplete, inaccurate, or that our continued use and storage are contrary to our obligations to other individuals or third parties. When we delete personal information, it will be removed from our active database, but it may remain in archives where it is not practical or possible to delete it. In addition, we may keep your personal information as needed to comply with our legal obligations, resolve disputes, and/or enforce any of our agreements.
- **Revocation of Consent.** If you revoke your consent for the processing of personal information then we may no longer be able to provide you certain services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, if we are unable to adequately verify your identity, or if our processing is not based on your consent.
- **Access to Your Personal information.** If required by law, upon request, we will grant reasonable access to personal information that we hold about you. Please direct all requests using the instructions described in Section 10. Contact Information.
- **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.
- **California Residents.** California residents under California Civil Code Section 1798.83 may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing. To submit your request, please email the address in the Contact Information section below with the subject line "California Privacy" and your request in the body of your email.
- **Decline to Provide.** You may choose not to provide some types of personal information to us. This choice may result in our websites or their functionality not working.
- **Complaints.** Complaints can be sent to us by way of email or letter using the instructions listed in Section 10. Contact Information. Some jurisdictions may also allow you to complain to a data protection authority as well.
- **Rights under GDPR.** In addition to the above, you may also exercise your rights under GDPR as stated in Section 5. European & GDPR Privacy Rights.

#### 5. EUROPEAN & GDPR PRIVACY RIGHTS

Under GDPR, in certain circumstances, you have the right to: (a) request access to any personal information we hold about you and related information, (b) obtain without undue delay the rectification of any inaccurate personal information, (c) request that your personal information is deleted or erased provided the personal information is not required by us for compliance with a legal obligation under European or Member State law or for the establishment, exercise or defense of a legal claim, (d) prevent or restrict processing of your personal information, except to the extent processing is required for the establishment, exercise or defense of legal claims; (e) object to the processing of your personal data, and (e) request transfer of your personal information directly to a third-party where this is technically feasible.

You also have the right to complain to the ICO ([www.ico.org.uk](http://www.ico.org.uk)) if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with GDPR. Further you may learn more about your rights by visiting [www.ico.org.uk](http://www.ico.org.uk).

You can exercise any of these rights by contacting us using the instructions described in Section 10. Contact Information.

## 6. WHAT ARE THE LEGAL GROUNDS FOR OUR PROCESSING OF YOUR PERSONAL INFORMATION (INCLUDING WHEN WE SHARE IT WITH OTHERS)?

We rely on the following legal bases to use your personal data: (1) Consent, (2) Legal Obligation, or (3) Legitimate Interests.

**Lawful basis:** Consent

**The reason we use this basis:** With your consent, we process information to provide you with the best possible EF experience. We may process information in accordance with Section 1. Purpose, Use and Processing of Your Personal Information. Types of Information we collect may vary as explained in Section 2. Types of Information We Collect. You can withdraw your consent at any time by contacting us in writing using the Contact Information below.

**Data retention period:** We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.

**Sharing your information:** We do not share your information with third parties.

**Lawful basis:** Legal obligation

**The reason we use this basis:** EF may rely on this lawful basis if we need to process your personal data to comply with a common law or statutory obligation.

**Data retention period:** In accordance with local legislation and statutory obligation.

**Sharing your information:** We do not share your information with third parties.

**Lawful basis:** Legitimate interests

**The reason we use this basis:** We may process your information to provide you with the best EF experience. This includes but is not limited to, (a) fraud detection and prevention (crime prevention), (b) compliance with foreign law, law enforcement, court and regulatory bodies' requirements, (c) industry watch-lists and industry self-regulatory schemes, (d) information, system, network and cyber security, (e) general corporate operations and due diligence, (f) website development and enhancement, and (g) communications, marketing and intelligence.

**Data retention period:** We will continue to process your information under this basis until you withdraw consent or until it is determined that a legitimate interest no longer exists.

**Sharing your information:** We do not share your information with third parties.

## 7. HOW WE PROTECT PERSONAL INFORMATION.

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any unauthorized access to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

## 8. COOKIES AND OTHER WEB DEVICES.

Our website can send its own cookie to your web browser if your browser's preferences allow it. Cookie settings can be controlled in your internet browser to automatically reject some forms of cookies. If you view our website without changing your cookie settings, you are indicating you consent to receive all cookies from the website. If you do not allow cookies, some features and functionality of our site may not operate as expected.

EF may use Adobe Flash technology (including Flash Local Stored Objects "Flash LSOs") that allow EF to, among other things, serve you with more tailored information, facilitate your ongoing access to and use of the site, and collect and store information about your use of the site. Some of our websites or emails also use pixel tags, web beacons, clear GIFs, or other similar technologies to measure the success of marketing campaigns, and compile statistics about usage and response rates, and other purposes.

EF may use other web devices to track website usage and views. Please address any questions or concerns about our cookie or web device usage using the instructions described in Section 10. Contact Information.

## 9. MISCELLANEOUS.

The following additional information relates to our privacy practices:

- **Minors.** Our websites are not for individuals under age 13 or deemed a minor in the jurisdiction in which you reside. Those individuals should not access a website or provide personal information to us.
- **Transmission of Data to Other Countries.** Your personal information may be processed in other countries (such as the United States), where privacy laws may be less stringent than the laws in your country and where the government, courts, or law enforcement of that country may be able to access it. By submitting your personal information to us you agree to the transfer, storage and processing of your information in those countries in accordance with applicable laws (ie. GDPR) and certain safeguards for such transfers shall be put in place.
- **Third Party Applications/Websites.** We have no control over the privacy practices of websites or applications that we do not own.
- **Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information.

## 10. CONTACT INFORMATION.

If you have any questions, comments, or complaints concerning our privacy practices please contact us at the appropriate email address below. We will respond to your requests in accordance with this Privacy Policy and in a reasonable time and manner. Please note that EF may elect not to respond to unreasonable or irrelevant requests.

**Data Protection Officer/Data Controller**

Privacy Policy Support  
Elastos Foundation Ltd.  
22 North Canal Road  
#02-00  
Singapore, Singapore 048834  
[contact@elastos.org](mailto:contact@elastos.org)

Thank you from all of us for being part of the Elastos community.