

PRIVACY POLICY

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Welcome to our website qvrse.io (the “Qvrse Website”), the platform <https://dapp.qvrse.io/> (the “Qvrse platform”), and the wallet <https://app.qvrse.io/> (the “Qvrse wallet”).

HAZEL LABS d.o.o. (hereinafter: “HAZEL LABS d.o.o.”, “Qvrse”, the “Company”, “we”, “our”, “us”) is a company registered in Ukmarjeva 2, Ljubljana, Slovenia, that manages the Qvrse Website, Qvrse Wallet and the Platform and all the services provided therein (“Services”). We are registered in the court register of Slovenia, registration number 9041265000, Ukmarjeva 2, Ljubljana.

HAZEL LABS d.o.o. is the data controller of your personal data processed for purposes set forth herein and, unless expressly specified otherwise, is responsible for the collection, use, disclosure, retention, and protection of your Personal Data in accordance with our privacy standards, this Privacy Policy, and applicable laws.

This data privacy information applies to all users of the Qvrse Site, the Qvrse Platform, and the Qvrse Wallet (together “you”, “your” or “Users”).

We at Qvrse value your privacy and would therefore like to explain how we collect, use, store and disclose some of your personal information. In order to ensure that you are properly informed we encourage you to carefully read this Privacy Policy.

CONTENTS

1. Acceptance of this Privacy Policy
2. Definitions
3. What personal information do we collect?
4. What do we do with the gathered information?
5. How do we protect your information?
6. What are your rights?
7. Children’s privacy
8. Links to other websites
9. Do we use cookies?
10. Changes to the current Privacy Policy
11. Getting in touch with us

Our Privacy Policy applies to all Users as defined in our standard Terms, unless

the context indicates otherwise. Our Terms and Conditions are accessible at qvrse.io.

1. ACCEPTANCE OF THIS PRIVACY POLICY

By accessing and using our Services on our Site, the Platform and the Wallet you signify acceptance of the terms of this Privacy Policy. Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below. We may provide additional "just-in-time" disclosures or information about the data processing practices of specific Services. These notices may supplement or clarify our privacy practices or may provide you with additional choices about how we process your data.

If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our Services.

2. DEFINITIONS

"Personal Data" (in the context of this Privacy Policy) means any information identifying or describing an identifiable individual, including, but not limited to, information relating to their name, age, gender, reproductive status, marital status, national, ethnic or social origin, sexual orientation, physical or mental health, disability, conscience, belief, culture, language and birth of the individual; educational, criminal or employment history of the individual, financial status or information relating to financial transactions in which they have been involved and any identifying number, address or contact information of the individual.

The following terms "controller", "processor", "data subject", "processing activity/ies", "pseudonymisation", "cross-border processing of personal data", "supervisory authority" used in this document shall have the same meaning as in the GDPR unless relevant to a different law or regulation.

Any other terms which are used throughout this Privacy Policy shall have their respective meanings, as defined in our standard Terms, unless the context indicates otherwise.

3. WHAT PERSONAL INFORMATION DO WE COLLECT?

3.1. General information

When you use our Services we collect some of your personal data. This enables us to effectively provide you with our Services. All personal data will be processed lawfully, fairly and transparently. Some of the data you provide to us directly, for example, when you register to use our Platform, make inquiries through our Platform, or contact us for support etc. In order to make our Services available to you, we may furthermore obtain and process certain data.

3.2. The personal data we collect

We only collect personal data we have specific use for. Which data is gathered and processed depends on the ways in which you interact with our Services as well as the settings and decisions you make regarding your privacy.

Personal information we collect:

- **Contact information** such as email, and blockchain wallet address. This is needed because if you create an in-browser Ethereum and Polygon Wallet, we need to keep the email address so you can access the wallet if you sign out;
- **Account log-in credentials** such as your email address or usernames;
- **Financial information:** blockchain wallet address;
- **Device Information:** Data from which your device could be identified, such as device serial number, or about your device, such as browser type;
- **Usage Data:** Data about your activity on and use of our offerings, such as app launches within our Services, product interaction; crash data, performance and other diagnostic data; and other usage data;
- **In Case Of Using A Location-Enabled Device:** We may collect location data or use various means to determine the location;
- **Technical Information:** Including the Internet protocol (IP) address used to connect your computer to the Internet, the User login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; information about the visits, including the full Uniform Resource Locators (URL), clickstream to, through and from the Platform (including date and time), products viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number;
- **Other Information You Provide to Us.** Details such as the content of your communications with the Qvrse.

3.3. Your options

You can also decide which data we collect. You may decline when asked to provide your personal information. However, if you do not provide us with the necessary data (one that enables us to make the Services available to you), you might have certain difficulties using our Services.

4. WHAT DO WE DO WITH THE GATHERED INFORMATION?

4.1. Using your personal data

We use the gathered personal information to provide you with our Services and to ensure our legitimate interests. These include providing our Services, maintaining coordination, and sending you notifications such as updates regarding your activities on our Services.

Some of the personal information may also be used for marketing purposes (e.g. we could use your email address to send you certain marketing campaigns).

Personal data shall not be used to make automated decisions (for example credit scoring or profiling Users).

4.2. Where and for how long is your personal data stored?

Personal data is stored digitally on third-party servers, specifically on <https://www.neoserv.si/> and <https://onfido.com/>, and for as long as you use our Services.

4.3. Do we share your personal data with third parties?

Qvrse discloses your personal data as described below and elsewhere in this Privacy Policy.

Access to personal data is limited only to Qvrse developers. We may however share your data with third-party service providers.

In addition, you should know that some of the personal information we gather may be disclosed or transferred to the purchaser of our business. We shall also disclose some or all of your personal data to meet our legal obligations, for example, to help law enforcement authorities when legally required.

5. HOW DO WE PROTECT YOUR INFORMATION?

5.1. General information

Your personal data is processed in a way that ensures the appropriate security. This includes protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

We try to do our best to protect your personal information. Unfortunately, passing on information via the internet is never completely secure, which is why, despite our best efforts, we cannot guarantee the security of your personal information.

5.2. Your responsibility

Please note that you are responsible for protecting your credentials connected with your account on our Services. You are also fully responsible for any use of your account under your user name.

5.3. Protection of personal data under EU legislation

If you are located in the European Union, the following safety measures are also provided for securing your personal information.

Security measures: Appropriate technical and organizational measures are implemented to ensure that, by default, the only personal data processed are those, which are necessary for each specific purpose of processing. This applies to the quantity, the extent of the processing, the period of storage, and the accessibility of the collected personal data. With such measures, we try to ensure that personal data are not made accessible to an indefinite number of persons without your intervention.

In case of a personal breach: If a personal data breach occurs we shall without undue delay, where feasible, not later than 72 hours after having become aware of it, notify the supervisory authority. This does not apply when the personal data breach is unlikely to result in a risk to your rights and freedoms. In case of a risk to your rights and freedoms due to a personal data breach, we shall also inform you without undue delay. This does not apply to situations where we have implemented appropriate technical and organizational protection measures that were applied to the personal data affected by the breach or if our subsequent measures ensure that the risk is no longer likely to materialize. It also does not apply when it would involve a disproportionate effort. In the described cases we shall inform you through public communication or a similar way in an equally effective manner.

6. WHAT ARE YOUR RIGHTS?

As our User, you have certain rights regarding the processing of your personal information. The extent of these rights depends on where you are located. If you reside in the European Union, please refer to section 6.1., on the other hand, if you reside outside the EU refer to section 6.2. and section 6.3. if you are a resident of California. For any further questions regarding your rights, please feel free to contact us at any time via the email disclosed below.

6.1. Rights of individuals residing within the European Union

If you are located within the EU, you have the following rights, guaranteed by the European General Data Protection Regulation (GDPR):

Right to be informed - you have the right to concise, transparent, intelligible, and easily accessible information regarding the processing of your personal data.

Right of access - you have the right to access the personal data we have about you. You can ask us for confirmation as to whether your personal information is being used and in what way we use it (e.g. the purposes of the processing, the recipients). A copy of your personal information shall also be provided to you at your request.

Right to rectification (updating your information) - on your request we shall, without undue delay, ensure that inaccurate personal data is updated. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed.

Right to erasure (deleting your information) - when certain specific criteria are met (Article 17 GDPR), you have the right to ask us to delete any personal data we hold about you without undue delay.

Right to restriction of processing - under certain circumstances (Article 18 GDPR), you can request that we restrict the way in which we process your personal information.

Right to data portability - you have the right to receive the personal data we hold about you in a structured, commonly used, machine-readable format. You may also transfer this data to a third-party provider of services. Note that this right only applies when we use your information on the basis of your consent or performance of a contract and our use of your information is carried out by automated means.

Right to object - you have the right to object at any time to our processing of your personal data if you have a valid reason. Unless there are compelling legitimate grounds for further processing, we shall stop processing your personal data. This right also enables you to require from us that we stop using your personal information for direct marketing purposes.

Complaints - you may make a complaint to the relevant data protection regulator under the conditions of GDPR.

Since your privacy is very important to us, our employees receive additional training regarding GDPR-related matters. Therefore, if you have any questions regarding your rights or the circumstances in which these rights are applicable, please contact us. You can also read more detailed descriptions of each right in Chapter III of the GDPR (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=SL>).

Legal bases for processing information of EU residents - if you are an EU resident, we will only process your personal information when one (or more) of the following requirements is met:

- When we have your consent to do so. If consent is the legal basis for the processing of your personal data, you may withdraw your consent at any time.
- When processing is necessary for the performance of the contract to which you are a party to (e.g. for providing the services you requested).
- To comply with our legal obligations.
- When it is necessary to protect your vital interests or those of other individuals.
- When processing is necessary for the performance of a task carried out in the public interest.
- When we (or a third party) have a legitimate interest in processing your personal data.

6.2. Rights of the individuals residing outside the European Union

If you are a non-EU User of our Services your personal data may be processed for the purposes described in this Privacy Policy in accordance with the rights described above. However, we reserve the right to process your information by the standards of your country's legislation, which may guarantee a lower standard of rights than the GDPR.

6.3. California Resident Rights

If you are a California resident, you have certain rights under the California Consumer Privacy Act (CCPA) regarding the use of your personal data. You may ask us to disclose what personal information we have about you and what we do with this information, to delete it, and not to sell it. You also have the right to be notified when (or before) we collect your personal information, the types of

personal information we are collecting, and what we might do with that information. Note that we shall not discriminate against you for exercising your CCPA rights.

In order to exercise CCPA rights, send us a request with sufficient information regarding your identification as the data subject and a detailed request with the declaration, under the penalty of perjury, that you are exercising your CCPA rights for lawful purposes. We will do our best to respond to your valid request (one that meets the described criteria) within 45 days of receiving it.

7. CHILDREN'S PRIVACY

We do not intentionally gather personal information about children below the age of 13.

If you are a parent or a guardian of a child that is using our Services, you can ask us to delete your child's information and/or refuse to allow future processing of their personal data. To ensure your child's safety and privacy, we shall verify your identity before enabling you access to the information we hold about your child.

8. LINKS TO OTHER WEBSITES

Our Services may contain certain hyperlinks to websites/apps that are not run by us. These include Instagram, Twitter, Discord, Facebook, TikTok, LinkedIn, Snapchat, Discord, etc. We are not responsible for personal information about you that is collected and stored by these platforms and similar third parties. They have their own Privacy Policies so please note that this Privacy Policy does not apply to them. For that reason we recommend you to read their Privacy Policies carefully before submitting personal information to them.

Our Services may also include social media features, such as the Facebook button and Widgets, such as the Share this button or interactive mini-programs that run on our Platform. These features may collect your IP address, which page you are visiting on our Services, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Platform. Your interactions with these features are governed by the privacy policy of the company providing it.

9. DO WE USE COOKIES?

Our Services do not use cookies.

10. CHANGES TO THE CURRENT PRIVACY POLICY

We reserve the right to make certain changes to the current Privacy Policy when necessary. For that reason, we encourage you to read our Privacy Policy every now and then to keep yourself updated. You will be able to see the date of the latest update at the beginning of our Privacy Policy.

11. GETTING IN TOUCH WITH US

Making sure that your privacy needs are met and that you are fully informed is very important to us. Therefore, if you have any further questions or any complaints regarding our Privacy Policy, you can contact us at [**info@qvrse.io**](mailto:info@qvrse.io)