

IOGINALITY

PRIVACY POLICY

Date: 21 October 2024

IOGINALITY is committed to respect and protect your Personal Information. We have made this Privacy Policy to help you understand what information we collect about you and why, and to let you know how we use and protect this information.

This Privacy Policy becomes applicable whenever you use our Website, IOGINALITY Marketplace or our Services. You consent to be legally bound by this Privacy Policy as published and from time to time updated at Website.

Please do not use our Services if you do not agree with our [Terms of Service](#) and Privacy Policy.

Terms used in this Privacy Policy are used with the same meaning as in our Terms of Service.

1. *Personal Information we collect*

“Personal Information” means information that identifies or is reasonably capable of identifying an individual, directly or indirectly, and information that is capable of being associated with an identified or reasonably identifiable individual.

1.1. *Personal Information we collect automatically*

We may collect the following categories of Personal Information automatically through your use of our Services:

- Online identifiers, such as your IP address and domain name.
- Device information, such as your hardware, operating system and browser type.
- Usage data, such as system activity, internal and external information related to IOGINALITY pages that you visit, and clickstream information.
- Geolocation data.
- Cookies, that are small text files placed on your device by websites that you visit. They are widely used to make websites work, or work better. Cookies provide us with valuable information on the user experience on Website.

1.2. *Personal Information you provide*

We may collect the following categories of Personal Information directly:

- Identification information, such as your name, email, phone number, country of residence, digital wallet address, postal address, and any other information you directly provide us.
- Information on your commercial activity, such as trading activity, deposits, withdrawals, and account balances.
- Correspondence, such as information you provide to us in correspondence, including during signing up of a new account.
- Sensory information, such as images, that you upload to your profile.
- Social media information: we may have a social media presence on social media platforms and social networks. When you interact with us on social media, we may receive Personal Information that you provide or make available to us based on your settings, such as your

profile information. We also collect any social media profile information you directly provide to us.

- Documents and information you provide to us or to our data processing partners during the verification, such as identity document (passport, driver's license, or another identity document), selfie (liveness check), and any other information you directly provide to us on or through the registration or verification of your account.

1.3. *P*ersonal Information we collect from third parties

We may collect and verify the following categories of Personal Information about you from third parties, including service providers and our affiliates:

- Identification information such as name, email, phone number, postal address.
- Transaction Information such as public blockchain data. Bitcoin, ether, and other digital assets are not truly anonymous. We, and any others who can match your public digital asset address to other Personal Information about you, may be able to identify you from a blockchain transaction because, in some circumstances, Personal Information published on a blockchain (such as your digital asset address and IP address) can be correlated with Personal Information that we and others may have. Furthermore, by using data analysis techniques on a given blockchain, it may be possible to identify other Personal Information about you.
- Financial information such as bank account information, routing number, credit card number, debit card number, if you provide us with this information directly.
- Additional information that we may ask you to submit to comply with legal obligations.

2. *A*ccuracy and retention of Personal Information

We take reasonable and practicable steps to ensure that your Personal Information is held by us is (i) accurate with regard to the purposes for which it is to be used and (ii) not kept longer than is necessary for the fulfilment of the purpose for which it is to be used.

3. *I*nformation use

We may use your information for any lawful purpose, including the following:

- To provide you with our Services pursuant to our Terms of Services.
- To create, maintain, and authenticate your account and process transactions.
- To fulfill your purchases.
- To respond to your inquiries.
- To enable you to offer NFTs for sale through our Services.
- To verify your information so that you may bid, buy, and sell NFTs through our Services.
- To operate, personalize, and improve the Services, including for analytics purposes.
- To send updates, promotions, and marketing materials that may be of interest to you.

- To detect and prevent fraud on your account, which is especially important given the irreversible nature of cryptocurrency transactions.
- To comply with the law and to maintain the security of our Services.

We may use your Personal Information for additional purposes if that purpose is disclosed to you before we collect the information or if we obtain your consent.

4. Information Sharing

We may share your Personal Information with:

- Service providers, including hosting services, email services, advertising and marketing services, payment processors, customer support services, compliance providers (KYC and AML providers), and analytics services.
- Professional advisors, such as lawyers and accountants, where doing so is necessary to facilitate the services they render to us.
- Business transaction recipients, such as counterparties and others assisting with a merger, acquisition, financing, reorganization, bankruptcy, receivership, dissolution, asset sale, or similar transaction, and with successors or affiliates as part of or following that transaction.
- Government authorities or international financial organizations, where required to do so for the compliance and protection purposes described above.
- Affiliates: we may share Personal Information with our current and future affiliates, meaning an entity that controls, is controlled by or is under common control with IOGINALITY. Our affiliates may use the Personal Information we share in a manner consistent with this Privacy Policy.
- Complainants: If you are a User, we may, at our sole discretion, share your Personal Information with individuals who claim that any material that you submit to IOGINALITY Marketplace infringes their intellectual property and other proprietary rights.

Your Sharing: Your transactions through the Service will be recorded on the Ethereum blockchain and associated with your wallet ID.

5. Your rights

You can freely exercise the following rights:

- To obtain confirmation as to whether or not your Personal Information is being processed.
- To request us to amend or rectify your Personal Information.
- To erase Personal Information, or “right to be forgotten” if one of the following applies: (i) the Personal Information is no longer necessary in relation to the purposes for which was collected or otherwise processed; (ii) you object to the processing, and there are no overriding legitimate grounds for the processing; (iii) the Personal Information have been unlawfully processed.

- To restrict Personal Information processing if one of the following applies: (i) the accuracy of the Personal Information is contested; (ii) the processing is unlawful, and you object to the erasure of the Personal Information and request to restrict its use instead; (iii) we no longer need the Personal Information for the purposes of the processing, but they are required by you to establish, exercise or defend legal claims.
- To be informed as to rectification or erasure of Personal Information or about imposition of the restriction on its processing.
- Not to be subject to a decision based solely on automated processing unless one of the following applies: (i) such decision is necessary for entering into, or performance of, a contract between the User and IOGINALITY Marketplace (ii) such decision is authorized by the law to which IOGINALITY Marketplace is subject and which also lays down suitable measures to safeguard your rights, freedoms and legitimate interests, or (iii) such decision is based on your explicit consent.

We do not sell your Personal Information.

To exercise your rights, please contact us by email at info@ioginality.io.

6. Cookies

We collect basic analytics data through cookies when you access or use IOGINALITY Marketplace. A "Cookie" is a small piece of data or text file stored on the local hard disk of your computer or mobile device. These include our own first-party Cookies and third-party Cookies. Some Cookies are only stored temporarily and destroyed each time you close your web browser. Others may remain on your browser and may collect and store data for a period of time after you have left IOGINALITY Marketplace.

7. Third-Party Links and Tools

Our Website may provide links to third-party websites or apps. We do not control the privacy practices of those websites or apps, and they are not covered by this Privacy Policy. You should review the privacy policies of other websites or apps that you use to learn about their data protection practices.

Our Website includes integrated social media tools or "plug-ins," such as third-party social networking tools. If you use these tools to share Personal Information or you otherwise interact with these features on our Website, those companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with the general public.

Your interactions with third-party companies and your use of their features are governed by the privacy policies of the companies that provide those features. We encourage you to carefully read the privacy policies of any accounts you create and use.

8. Processing of children's Personal Information

IOGINALITY Marketplace is not intended for persons under the age of 18, and we do not knowingly collect Personal Information from children under the age of 13. If we learn we collected Personal Information from a child under 13, we will delete that information from our files.

9. Updating Your Information

When you have an account with us, you may review, change, or update your information by logging into your account and updating your account settings.

10. Changes to our Privacy Policy

If our information practices change, we will post these changes on this page. We encourage you to visit this page periodically to learn of any updates.

11. Contact

If you have questions, comments or concerns about this Privacy Policy, please contact us at by email at info@ioginality.io.

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