

Tradeleaf Community Sale Privacy Notice

Last Updated: April 19, 2023

1. Why Do You Need this Privacy Notice?

We encourage you to carefully read this Privacy Notice as it provides you with information about your personal data being processed in connection with your participation in the Community Sale.

In this Privacy Notice, personal data and personal information are used as synonyms and mean any information that directly or indirectly identifies you as an individual. In this Privacy Notice we explain which types of personal data we hold on you, how we collect and process such data, how long we keep it, and so on.

2. Where Can You Find the Definitions?

Unless otherwise provided in this Privacy Notice, capitalised terms used in this Privacy Notice have the meaning determined in the [Tradeleaf Community Sale Terms](#) (the “**Terms**”). We encourage you to read these Terms carefully as they affect your obligations and legal rights.

3. Who Are We and How to Reach Us?

When we say “**we**”, “**us**”, or “**our**”, we mean Trade Leaf Solutions Ltd, a BVI business company. With respect to personal data collected in connection with your participation in the Community Sale, we act as a data controller, meaning that we solely determine what data collected as well as the purposes and means of processing of your data.

We process your personal data in accordance with this Privacy Notice and we endeavour to comply with the applicable data protection legislation, which includes the BVI Data Protection Act, 2019 (the “**Applicable Legislation**”).

If you have any questions regarding this Privacy Notice or the processing of your personal data, do not hesitate to contact us at legal@tradeleaf.io.

4. What Personal Data Do We Collect?

We collect and process the following types of personal data as outlined below. Please note that we may also collect certain other information, which may be required under the applicable laws.

<i>Category of Data</i>	
<i>Examples</i>	<i>Description or Comments</i>
Application Data	
email address	-
Twitter username	
Telegram username	

Verification Data	
first name, last name, and middle name	-
date of birth	
country of residence	
ID document information	This includes your passport and associated information.
contact details	This includes email address and phone number.
Wallet Data	
Wallet Addresses	“Wallet Address” means a public address on the respective blockchain associated with the relevant Wallet. It constitutes a random set of symbols assigned by the respective blockchain network.
information about Transactions	This may include information about transactions associated with the Wallet Addresses and carried out in connection with your participation in the Community Sale (the “ Transactions ”), such as Transaction ID, amount, time and date, status, etc. References to “Wallet Address” and “Transaction” in this Privacy Notice apply to the Wallet Addresses and transactions on all applicable blockchain networks.
Contact Data	
full name	-
contact details	This may include your email address or phone number.
any other data requested by us or data that you choose to provide us with	Please do not provide personal data unless it is reasonably necessary or requested by us.

5. How Do We Use Personal Data?

<i>Description</i>	<i>Lawful Basis for Processing</i>
Application Data	
To enable you to get “whitelisted” to participate in the Community Sale and purchase Tokens	To take steps at your request prior to entering into a contract , and, further, to perform a contract with you. If you act on behalf of a legal entity — our legitimate interest to ensure the participation in the Community Sale by the legal entity you represent.

<p>To enable you to participate in our community and provide you with marketing and newsletter emails concerning the Community Sale, Tokens, as well as general updates.</p>	<p>With respect to email address — our legitimate interest to expand our community and encourage its members by distributing the Tokens among them as well as notify you about updates, available choices and/or opportunities regarding the Project and Community Sale to enable you to take advantage of them.</p> <p>You may unsubscribe from receiving marketing and newsletter emails from us at any time by (i) contacting us; or (ii) clicking the unsubscribe button available at the bottom of each marketing and newsletter email.</p> <p>In such a case, we will delete your email address from the respective marketing database. Please note that in this case, we may reject your participation in the Community Sale since you will no longer be a member of our community.</p> <p>Please note that administrative or service-related communications (security alerts, email verifications, maintenance notifications, etc.) are not considered marketing and such communications may not offer an option to unsubscribe.</p>
Verification Data	
<p>To identify you as an individual and verify your identity.</p>	<p>Our legitimate interest to prevent money laundering, financing of terrorism, or other illegal activities, and to comply with the applicable sanctions, administered or enforced by any country, government or international authority, including the EU, OFAC, United Nations Security Council, but not limited to the above.</p>
<p>To enable you to participate in the Community Sale.</p>	
Wallet Data	
<p>To carry out transactions, arising out and in connection with your participation in the Community Sale.</p>	<p>To perform a contract with you.</p>
	<p>Our legal obligation to keep and retain financial records to comply with the applicable laws.</p>
Contact Data	
<p>To respond to your inquiry.</p>	<p>Our legitimate interest to respond to your inquiry.</p>

6. How Long Do We Process Your Data?

As a general rule, we keep personal data as long as it is necessary for the purposes it was collected. We may process certain personal data longer than outlined below, if it is necessary:

- (a) to meet our legal obligations under the applicable law;
- (b) in relation to anticipated or pending legal proceedings; or
- (c) to protect our rights and legitimate interests or those of third parties.

Storage Period	Rationale
Application Data	
If you get “whitelisted” and we enter into a contractual relationship with you or the entity you represent — until all Transactions are performed in full.	We need such data as long as you participate in the Community Sale.
If we reject your application and do not enter into a contractual relationship with you or the entity you represent — for one (1) following your last application.	We set this retention period to allow you to reapply and due to the statutes of limitations established in the Terms.
With respect to email address — as long as you remain a subscriber.	We process your email address until you opt out from receiving our marketing and newsletter emails.
Verification Data	
For five (5) years after the completion of all Transactions.	We set this retention period due to the retention period for Verification Data established under our policies and procedures and the law of our jurisdiction.
Wallet Data	
For five (5) years after the completion of all Transactions. Please note that due to the nature of a blockchain, the Wallet Addresses and Wallet Data associated therewith may be stored permanently on the applicable blockchain (not by us).	We set this retention period due to the retention period for Wallet Data established under our policies and procedures and the law of our jurisdiction.
Contact Data	
For one (1) year from the last date when you contacted us regarding the same matter.	We set this retention period due to the statutes of limitations established in the Terms.

7. How Do We Share Your Data?

General. We do not sell or rent out your data. However, we may share your personal data in accordance with this Privacy Notice, Applicable Legislation, or with your consent, in each case for the purposes of and if it is reasonably necessary:

- (a) to enable you to participate in the Community Sale and for the performance of our undertakings with you; or
- (b) for compliance with the applicable laws and regulations.

Please note that if we share any portion of your personal data with third persons, we will endeavour to secure such transfer using appropriate legal, organisational, and technical measures.

Recipients. Given the purposes outlined above, your personal information is shared with the following categories of recipients:

- (a) Affiliates;
- (b) support and technical teams;
- (c) verification service providers;
- (d) email delivery service providers;
- (e) hosting service providers;
- (f) government authorities, upon their request or if necessary to comply with our legal obligations;
- (g) another entity if we sell or otherwise transfer the Website; and
- (h) other third-party solutions, which may be from time to time integrated into the Website.

8. What Are the Features of Blockchain Data Processing?

Please note that the Wallet Data interacts with public decentralised blockchain infrastructures and blockchain-based software, including smart-contracts, that work autonomously. When we say that a blockchain is decentralised we mean that there is no single person, including us, who controls the blockchain or stores data available thereon, and when we say “public” we mean that the access is available for anyone and cannot be restricted. The data entered in a public decentralised blockchain is distributed via the nodes that simultaneously store all records entered into the blockchain.

By design, blockchain records cannot be changed or deleted and are said to be “immutable”. Please be aware that any Transaction within a blockchain is irreversible and information entered into a blockchain cannot be deleted or changed. Therefore, your ability to exercise certain data protection rights or abilities may be limited.

In addition, due to the blockchain’s nature, the information that was entered in a blockchain will be publicly available and we will neither control such information nor manage access to it. Once you start carrying out Transactions, certain data, which may be considered personal, will become publicly available on a blockchain. The ultimate decision whether to transact on a blockchain or carry out any Transactions rests with you.

9. Are You Subject to Automated Decision-Making?

Automated decision-making is the process of making a decision by automated means without any human influence on the outcomes. It is mandatory for you to provide the Verification Data in order to be eligible and authorised to participate in the Community Sale. When you provide us with your Verification Data, the verification systems will process it automatically and report to us whether you are eligible to participate in the Community Sale. If the verification systems notify us that you are not eligible to participate in the Community Sale, you will be automatically refused from using the Community Sale Page.

In addition, we may also automatically block users based on their geographical location. This is necessary to restrict access to the Community Sale Page for the users from prohibited jurisdictions,

meaning the jurisdictions in which the Community Sale is prohibited by applicable laws or regulations, the Terms, or our rules and policies.

If you do not agree with the outcomes of automatic decisions, you may: (a) request us to manually review the respective information and provide you with the outcomes of the review and/or (b) express your point of view and provide additional information or documents in order to contest the decision.

10. What About Interacting with Third-Party Links?

The Website may include links and social media plugins to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share certain data about you. We do not control these third-party websites and applications, and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy policy/notice/statement of every website or application you visit.

11. What Data Subject Rights Do You Have?

General. According to the Applicable Legislation, you may have the rights outlined below. In order to exercise your rights as a data subject, we may request certain information from you to verify your identity and confirm that you have the right to exercise such rights.

Blockchain Data Processing. Please note that when you interact with a blockchain, we may not be able to exercise certain rights that you may have pursuant to the Applicable Legislation with respect to the Wallet Data. For instance, we may not be able to ensure that such personal data is deleted, corrected, or restricted. You may learn more above in the “What Are the Features of Blockchain Data Processing?” section of this Privacy Notice.

Data Subject Rights. According to the Applicable Legislation, you may have the following rights:

<i>Rights</i>	<i>Description</i>
Right to access your personal data (commonly known as a “ data subject access request ”)	This enables you to ask us whether we process your personal data. If we process your data, you may request certain information about the processing activity and/or a copy of the personal data we hold about you, and check that we are lawfully processing it.
Right to rectification of the personal data	This enables you to have any incomplete or inaccurate data we hold about you completed or rectified, though we may need to verify the accuracy of the new data you provide to us.
Right to erasure of your personal data (commonly known as a “ right to be forgotten ”)	<p>This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.</p> <p>Note, however, that we may not always be able to comply with your request of erasure for specific legal or technical</p>

	reasons which will be notified to you, if applicable, at the time of your request
Right to object to processing of your personal data	This enables you to object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
Right to restrict the processing of your personal data	This enables you to ask us to suspend the processing of your personal data in the following scenarios: (i) if you want us to establish the data's accuracy, (ii) where our use of the data is unlawful but you do not want us to erase it, (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
Request the transfer of your personal data (commonly known as a " right to the data portability ")	We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
Right to withdraw consent	You may withdraw your consent at any time where we are relying on consent to process your personal data.
Right not to be subject to automated decision-making	You reserve the right not to be subject to a decision based solely on automated processing of data, including profiling, which produces legal effects concerning you or similarly significantly affecting you.
Right to file a complaint	You may file a complaint with a relevant supervisory authority in case we violate your rights or obligations imposed on us under the Applicable Legislation. The relevant supervisory authority will particularly depend on where you are located.

12. Do We Process Children's Personal Data?

The Website and Community Sale are not intended for the use of children (under 18 years old or older, if the country of your residence determines a higher age restriction). We do not knowingly market to, solicit, process, collect, or use personal data of children.

If we become aware that a child has provided us with personal information, we will use commercially reasonable efforts to delete such information from our database. If you are the parent or legal

guardian of a child and believe that we have collected personal information from your child, please contact us.

13. Can We Modify and Update this Privacy Notice?

We keep our Privacy Notice under regular review and we may update it at any time. If we make any changes to this document, we will change the “Last Updated” date above. Please review this Privacy Notice regularly to check for the updates. If we make substantial changes to the way we treat your personal information, we will either (i) display a notice on the Website, or (ii) notify you by email prior to the change becoming effective.