

Privacy Policy

1. Introduction

This Privacy Policy contains information on the rules for the processing and protection of any of your personal data in connection with the use of the website <https://candao.io/> (the “Site”) operated by CANDAO INFORMATION AND WEB SERVICES LTD. with its registered office in Seychelles, registration number 237097 (the “Company”, “we,” “our,” or “us”).

2. Acceptance of the Policy

By accessing or using the Site, you accept the terms of this Policy, and consent to our collection, use, disclosure and retention of your information as described in this Policy. If you do not agree with this Policy, you should not use the Site.

3. Information collected that is provided by you

We collect the following information provided by you:

- *identity information*: name or username, picture (avatar)
- *contact information*: telephone number

4. Information collected automatically

We use tracking technologies to automatically collect information including the following:

- *Log Files*, which are files that record events that occur in connection with your use of the Site. Log files are created when you view content or otherwise interact with the Site.
- *Cookies*, which are small data files stored on your device that act as a unique tag to identify your browser. We will only use strictly necessary cookies in connection with the Site. For the avoidance of doubt, the cookies that we include are essential for you to browse the Site and use its features, including accessing secure areas of the Site.

5. Public information collected

We may collect data from activity that is publicly visible and/or accessible on blockchains. This may include public key to your cryptocurrency wallet as well as any information available on the blockchain relating to the operations made with the use of the cryptocurrency wallet.

6. Use of personal data by us

We process your personal data for the following purposes:

- 1) to operate, manage and perform the Site, including without limitation:
 - to enable you to access and use the Site,
 - to send information, including confirmations, technical notices, updates, security alerts, and support and administrative messages;
- 2) to protect the security and integrity of the Site; improving the Site, including verifying your eligibility and delivering prizes in connection with your entries as

well as fulfilling any other business purpose, with notice to you and upon your consent;

3) to communicate with you in order to inform you on changes in this Policy.

Notwithstanding the above, we may use information that does not identify you (including information that has been aggregated or de-identified), except as prohibited by applicable law. Please see also the “Cookies. Tracking” section below.

7. Period of personal data storage

Your personal data will be processed as long as you use the Site. Subsequently, your data will be kept by us for period resulting from legal provisions regarding the implementation of the archiving obligation and for the period of limitation of claims.

8. Your rights in connection with the processing of personal data

You have the right to:

- withdraw your consent at any time; the exercise of the right to withdraw consent does not affect the processing that took place until the consent was withdrawn but may impair our ability to use the Site,
- access to your personal data, rectification, to erasure (“right to be forgotten”) and/or restriction of the processing of personal data,
- object to data processing,
- lodge a complaint to the supervisory body.

If at any point you wish to exercise the any of the rights indicated above, you may contact us via our email or postal address listed in the “Contact Us” section below.

Please be informed that information that is by definition public or that you made public including without limitation, public key of your cryptocurrency wallet and certain details of operations cannot be deleted from the blockchain, therefore we are unable to delete such information.

9. Data security

We work to protect the security of your personal information during transmission by using encryption protocols and software. Despite all such efforts, we cannot fully guarantee against the access, disclosure, alteration, or deletion of data through events, including but not limited to hardware or software failure or unauthorized use. The Site, and most importantly, the proper functioning of it require the Internet and the security of information transmitted through the Internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the Internet or for changes to or losses of data.

You are responsible for maintaining the security of your private key, any password or other form of authentication involved in obtaining access to password protected or secure areas of the Site. In order to protect you and your data, we may suspend your usage of the Site, without notice, pending an investigation, if any breach of security is suspected.

10. Sharing the personal data

We may share or disclose information that we collect in accordance with this Policy to:

- *Affiliates.* We share information with our affiliates and related entities, including where they act as our service providers or for their own internal purposes.
- *Service Providers.* We share information with third-party service providers for business purposes, including fraud detection and prevention, security threat detection, payment processing, customer support, data analytics, information technology, storage, and transaction monitoring. Any information shared with such service providers is subject to the terms of this Policy. All service providers that we engage with are restricted to only utilizing the information on our behalf and in accordance with our instructions.
- *Professional Advisors.* We share information with our professional advisors for purposes of audits and compliance with our legal obligations.
- *Merger or Acquisition.* We share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.

We also share information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may share information about you at your request or direction.

Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. Please see also the “Cookies. Tracking” section below.

11. International transfer

We have the affiliates and the service providers in other countries around the globe. Proper functioning of the Site may therefore require that your personal information may be transferred to or from the Cyprus or Seychelles or other locations outside of your state, province, country or other governmental jurisdiction where privacy laws may not be as protective as those in your jurisdiction.

EU User should know that whenever we transfer their personal information out of the European Economic Area (EEA) to the Seychelles or other countries not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be based on a data transfer mechanism recognized by the European Commission as providing adequate protection for personal information.

12. Third-Parties websites or services

Please note that this Policy does not apply to information collected through third-party websites or services that you may access through the Site. Those third parties may independently collect information about you and solicit information from you. The information collected and stored by those parties remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

13. Cookies. Tracking

- *Cookies.* We will only use strictly necessary cookies. These cookies are essential for you to browse the Site and use its features, including accessing secure areas of the Site.

- *Do Not Track*. Your device settings may allow you to automatically transmit a “Do Not Track” signal to the online services you visit. Note, however, there is no industry consensus as to what site operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to “Do Not Track” signals. Please be aware that if you disable or remove tracking technologies some parts of the Site may not function correctly.

14. Additional Disclosures for data subjects in the European Economic Area and the United Kingdom.

This section applies if you are a resident of the European Economic Area or the UK.

A. Roles.

Under the General Data Protection Regulation in the European Economic Area and the United Kingdom (“GDPR”), we act as a “controller” with respect to personal data collected as you interact with the Site.

B. Lawful Basis for Processing.

The GDPR requires that any processing of personal data is done on a lawful basis. Our lawful bases include where: (i) you have given consent to the processing for one or more specific purposes, either to us or to our service providers or partners; (ii) processing is necessary for the performance of a contract with you; (iii) processing is necessary for compliance with a legal obligation; or (iv) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests. Where necessary in the context of the Site, we will transfer your personal data to third parties subject to appropriate or suitable safeguards, typically standard contractual clauses.

C. Your Rights.

If you are a user of the Site in the EEA or the U.K., you maintain certain rights under the GDPR. These rights include the right to (i) request access and obtain a copy of your personal data; (ii) request rectification or erasure of your personal data; (iii) object to or restrict the processing of your personal data; and (iv) request portability of your personal data. Additionally, if we have collected and processed your personal data with your consent, you have the right to withdraw your consent at any time.

Please note that in no circumstance we can edit or delete information that is stored on a particular blockchain as we do not have custody or control over any blockchains. This information includes all transaction data related to your interaction with the Site.

To exercise any of your rights under GDPR, including in cases when you have any issues with our compliance, please contact us via our email or postal address listed in the “Contact Us” section below and specify which right you are seeking to exercise. We will respond to your request within thirty (30) days. We may require specific information from you to help us confirm your identity and process your request. Please note that we retain information as necessary to fulfill the purpose for which it was collected and may continue to retain and use information even after a data subject request in accordance with our legitimate interests, including as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

You also reserve the right to lodge a complaint with the data protection regulator in your jurisdiction.

15. Changes to the Privacy Policy

We may change this Policy at any time by posting the amended Policy on the Site. The amended Policy will be effective immediately. For the avoidance of doubt, your continued use of the Site indicates your consent to such an amended Policy.

16. Change of the data processor

The managing of the Site may be transferred to our affiliate company, thus we will also transfer the data processing. We will inform you of such change in accordance with Section 15 above.

17. Contact Us

If you have any questions or comments in connection with this Policy or our compliance with them, please contact us at the following address:

By e-mail: privacy@candao.io