

# Privacy Policy BLOCKv Application

The protection of personal data is important to us. Therefore, we process personal data exclusively on the basis of the applicable data protection law. In this privacy policy we inform you about the types of personal data we collect, how this data is used, to whom it is transferred and what options and rights you have in connection with our data processing. In addition, we describe the measures we take to ensure data security and how you, as data subject, can contact us if you have any questions about our data protection practice.

## I. Name and Address of the Controller

We, BLOCKv AG, are controller within the meaning of the EU General Data Protection Regulation (GDPR) and other national data protection laws and regulations that determine the purposes and means of processing personal data. If you have any questions regarding the processing of your personal data, please do not hesitate to contact us:

BLOCKv AG  
Landsgemeindeplatz 11  
CH-6300 Zug  
Switzerland

Our data protection coordinator can be contacted at [support@blockv.io](mailto:support@blockv.io)

## II. General Information regarding the Processing of Personal Data

### 1. Scope of data processing

We only process your personal data if this is necessary to allow you to use the BLOCKv application (“**Application**”) and to guarantee the Application’s functionality and stability. As far as the GDPR is applicable, we only process your personal data if this is required to perform a contract to which you are party according to art. 6 (1) (b) GDPR and to protect our legitimate interests according to art. 6 (1) (f) GDPR.

### 2. The erasure and storage of personal data

Your personal data will be erased or blocked as soon as it is no longer necessary in relation of the purpose of storage. Furthermore, personal data may be stored if this has been required by regulations, laws or other provisions to which we are subject. The personal data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless there is a need for further storage of the data for the conclusion or performance of a contract.

### III. Creation of Account

#### A. User Account

##### 1. Collected Information

If you want to create a user account (“**User Account**”) on the Application or on <https://www.blockv.io/> (“**Website**”) we will ask you to provide the following personal information (“**Personal Account Information**”) about you which we will collect and store as described herein:

- First Name
- Last Name
- Date of Birth (optional)
- Email Address
- Telephone Number
- Avatar Image
- Preferred Language
- Password

##### 2. Purpose and Legal Basis of Processing

The processing of the Personal Account Information allows us to open an individual User Account with a unique user ID (“**User ID**”) and an Ethereum wallet address which allows you to hold and control digital objects (“**Vatoms**”) that have been created and issued by developers using the BLOCKv platform (“**Platform**”). The creation of a User Account and individual User ID allows us to know who you are and enables you to interact with other users of the Application. As far as the GDPR is applicable, all processing of your Personal Account Information is required to perform a contract to which you are party according to art. 6 (1) (b) GDPR and covered by our legitimate interests according to art. 6 (1) (f) GDPR.

##### 3. Storage and Disclosure

Your Personal Account Information is stored on the Platform which is currently hosted by amazon web services (AWS) as well as on the log files of our systems. Your Personal Account Information will be deleted as soon as you decide to delete your User Account. While we retain your User ID, we will not anymore be able to create a connection between your Personal Account Information and your User ID. Furthermore, we will not disclose the Personal Account Information to anyone unless your user name (First Name, Last Name) and/or avatar image is set to “public”. In this case, your user name and avatar image is visible to other users of the Application who have created a User Account.

#### **4. Possibility of Objection and Erasure**

The processing of your Personal Account Information is absolutely necessary for the functionality of the Application and your User Account. While you have the right to object to the processing or to request deletion of your Personal Account Information, this will lead to the deletion of your User Account and make it impossible for you to use the Application.

#### **B. Developer Account**

If you want to create a developer account (“**Developer Account**”) on the Website under <https://www.blockv.io/developer>, we will ask you to provide the following additional information (“**Developer Account Information**”) about you which we will collect and store as described in section III.A:

- Company / Developer Name
- Company / Developer Domain
- Company / Developer Address
- Company / Developer Country
- Company / Developer Industry
- Fully Qualified Domain Name

All provisions in this Privacy Policy governing the processing of data relating to the User Account shall apply correspondingly.

### **IV. Verification of the User Account**

#### **1. Collected Information**

If you want to verify your User Account, we do not need to collect additional information. However, we will need to process your phone number and email address which you have already provided in order to create a User Account (“**Verification Information**”).

#### **2. Purpose and Legal Basis of Processing**

The verification of your User Account allows us to verify your identity and to restore your access to your User Account if you forget your password. As far as the GDPR is applicable, the processing of your Verification Information is required to perform a contract to which you are party according to art. 6 (1) (b) GDPR and covered by our legitimate interests according to art. 6 (1) (f) GDPR.

#### **3. Storage and Disclosure**

In order to verify your User Account, we use the services provided by the SMS gateway provider Twilio Inc., a cloud communications platform as a service (PaaS) company based

in San Francisco, CA 94105, California, USA (“**Twilio**”). Twilio allows us to use two factor authentication (“**2FA**”) to guarantee a secure authentication process to and from the platform and to restore access to your User Account. In order for Twilio to carry out authentication by SMS, we will send your telephone number to Twilio. Twilio may process your telephone number outside the EEA but is certified under the EU-US Privacy Shield. The latest data protection information on Twilio and additional information can be found on this website: <https://www.twilio.com/legal/privacy>.

Alternatively, we use the services of Amazon Web Services EMEA Sàrl. based in L-2338 Luxembourg (“**Amazon**”) that allows us to use two factor authentication (2FA). Amazon will use your email address to guarantee a secure authentication process to and from the platform and to restore access to your User Account. In order for Amazon to carry out authentication by Email, we will send your email address to Amazon. The latest data protection information on Amazon can be found on this website: <https://aws.amazon.com/privacy>.

#### **4. Possibility of Objection and Erasure**

The processing of your Verification Information is absolutely necessary for restoring access to your User Account. While you have the right to object to the processing of the Verification Information or to request deletion of your Personal Account Information, this will render it impossible to restore access to your User Account if you ever forget your password.

### **V. Creation of Transaction Data**

#### **1. Collected Information**

When you create a User Account and use the Application, we collect all transaction data that is related to your User ID (“**Personal Transaction Data**”). This Personal Transaction Data includes, but is not limited to, all transfer of Vatoms from your User Account to another user account, including the redemption of a Vatom, the pick-up or drop-off of a Vatom, or the acquisition of a Vatom.

#### **2. Purpose and Legal Basis of Processing**

The collection of Personal Transaction Data is essential in order to verify the location and ownership information regarding all Vatoms that are part of the BLOCKv ecosystem. Furthermore, some Vatoms have a built-in functionality that are only triggered based on certain transaction patterns. This means that we have to keep track of your Personal Transaction Data to ensure that these functionalities are triggered correctly. As far as the GDPR is applicable, all processing of your Personal Transaction Data is required to perform a contract to which you are party according to art. 6 (1) (b) GDPR and covered by our legitimate interests according to art. 6 (1) (f) GDPR.

### **3. Storage and Disclosure**

Your Personal Transaction Data is stored on the Platform and/or on the blockchain, depending on whether the Vatoms you are using are blockchain-enabled. If you delete your User Account, we will delete your name, telephone number and email as well as any other personal information from your profile. While we retain your User ID, we will not anymore be able to create a connection between your Personal Transaction Data and your Personal Information. We will only disclose your Personal Transaction Data in anonymized form and only to the publishers of the respective Vatoms.

### **4. Possibility of Objection and Erasure**

The processing of your Personal Transaction Data is absolutely necessary for the use of the Application. This means that your Personal Transaction Data cannot be deleted without jeopardizing the functionality and stability of the Application. Your User ID will always remain connected to your Personal Transaction Data. However, when you decide to delete your User Account, we will delete your Personal Account Information from your User ID. This means that we will not anymore be able to create a connection between you and your Personal Transaction Data. As a result, the Personal Transaction Data does not anymore qualify as personal data within the meaning of the applicable data protection regulation.

## **VI. Contact Possibility**

### **1. Collected Information**

If you want to contact us, you can do so by using the feedback button in the Application or on the Website which will trigger your email application to open a new e-mail pre-addressed to us. If you send the e-mail to us, we will collect your e-mail address as well as your feedback sent within this e-mail. We recommend you to additionally share with us the following information about the device you are using ("**Device Information**") which the new e-mail provides for by default:

- User ID
- Device Type
- Version of Operating System
- Version of Application
- Disk Space
- Memory

### **2. Purpose and Legal Basis of Processing**

The collection of the Device Information as well as of the e-mail address / feedback allows us to provide a better customer service and to better understand the reasons why you are contacting us. As far as the GDPR is applicable, all processing of your email address and

Device Information as described above is required to perform a contract to which you are party according to art. 6 (1) (b) GDPR and covered by our legitimate interests according to art. 6 (1) (f) GDPR.

### **3. Storage and Disclosure**

Your Device Information is stored on the BLOCKv support platform and will be deleted as soon as it is no longer necessary to achieve the above-mentioned purpose. We will neither disclose the Device Information nor your e-mail address to anyone, unless explicitly stated otherwise herein.

### **4. Possibility of Objection and Erasure**

You are free to decide whether you want to share your Device Information with us. If you do not want to share your Device Information with us, you can delete it manually from the email before you press the send button.

## **VII. Rights of the Data Subjects**

We would like to inform you that, subject to the limitations mentioned herein, you have the right to:

- withdraw your consent at any time as set forth in art. 7 GDPR
- request information about the processing of your data as set forth in art. 15 GDPR;
- rectification and erasure of your data as set forth in art. 16 GDPR;
- restriction of processing of your data as set forth in art. 18 GDPR;
- object to processing data as set forth in art. 21 GDPR;
- data portability as set forth in art. 20 GDPR; and
- lodge a complaint with a supervisory authority.

## **VIII. Changing this Privacy Policy**

We reserve our right to change or adapt this privacy policy at any time in compliance with the applicable data protection regulations. We will tell you about any changes by posting an updated privacy policy on our website. Any change we make applies from the date we post it on the website. If you have any questions about our privacy policy, please email us.

This privacy policy was updated on the 31.03.2019