

## **PRIVACY POLICY**

This Privacy Policy describes how we, OPN Co. Ltd., collect, use, share and otherwise process your Personal Data on our website located at (“Site”). This Privacy Policy will govern our treatment of your Personal Data during the term and performance of our online services provided by us through the Site (“Services”).

For the purpose of this Privacy Policy, “Personal Data” includes any information relating to an individual who can be identified particularly by reference of certain information given by such individual as requested by us for specific purposes in the following sections.

### **Collection of Personal Data**

We collect and will record in our web server logs your Personal Data as follows.:

- browser information (e.g. browser type and version, operating system, etc.) through user agent; strings and metadata provided during the access request by your system;
- Internet protocol (IP) addresses and their associated location;
- date and time of visit;
- referral uniform resources locator (URL); and
- pages visited by such visitor on our website.

We may collect Personal Data from you directly upon your use of the Services:

- Public information observed from blockchains including your Ethereum address (when transacting a purchase);
- Google UUID (Unique User ID).

### **Use of Personal Data**

The purposes which we use your Personal Data are as follows.

- To facilitate the cryptocurrency transactions through MetaMask or other wallets;
- To record the Site log for safety reasons and system security monitoring as part of our security program and to protect the security and effective functioning of our Site and information technology systems including prevention and detection of potential fraud, crime and Site misuse;
- To enhance our Site’s user experiences, improve our Site layout and information available on it by monitoring how our Site is used;
- To establish our marketing communication, provide relevant marketing materials to you including information about upcoming events/conferences, progress of our services, testing and implementation of our available services, advertisement and promotion of our products or services.

### **Sharing of Personal Data**

We may share your Personal Data with the following recipients:

- **Affiliates and associated companies:** We operate under the supervision OPN Co. Ltd., and we may share any part of your Personal Data with affiliated or associated companies in order to enhance our services that we provide to you.
- **Third-party service providers:** We share Personal Data with any third-party service providers to enable such parties to perform functions on our behalf and under our instructions in order to carry out the purposes prescribed in the above section. Our third-party service providers may include Site designer service provider, IT service provider, business analytics provider/advisor (such as Google Analytics and Intercom as mentioned below) and marketing campaigns advisor and event hosting provider, etc. which we engage such parties by execution of agreements or contracts to provide reasonable security of your Personal Data and to enable such parties to use and process such Personal Data only on our behalf and under our instructions.
- **Mandatory disclosures and legal claims:** We may be required to share your Personal Data in accordance with any subpoena, court order or other legal process, to comply with a request from our regulators, governmental request or any other legally enforceable demand.

### **Cookies**

We use and allow our cookies and certain third-parties to use cookies and similar tracking technology on our Site as follows.

- We use browser cookies to personalize content and your preference, to selectively deliver and display our advertisements and marketing materials to allow us to analyze statistical information of our Site users including frequency and location of Site access, and to measure conversion rate from Site visit to account sign-ups. For this profiling purpose we embed third party javascript from Google that share your browser information with them and link the site access with your browsing history using their cookies. In return, they provide us with anonymized Site's visitors' usage analysis. Your actual user identity that you shared with these providers will not share with us. You consent to our browser cookies if you continue to use our website and decide not to block them.

You may choose to disable or delete certain cookies on your internet browser settings, but you will not be able to access or use important features or functions of the Site. You can also delete all site access and conversion data shared with Google anytime from <https://myactivity.google.com/myactivity>.

### **Retention of Personal Data**

We will retain your Personal Data for our marketing communication and activities as long as you accept marketing communications from us. We will, by using our secured method, delete such Personal Data upon your request and in accordance with the applicable laws. For other purposes, we may retain your Personal Data as long as you continue to use the Service, have an account with us, or for as long as is necessary to fulfill the purposes outlined in this Privacy Policy. We may continue to retain your Personal Data even after you deactivate your account and/or cease to use the Service if such retention is reasonably necessary to comply with our

legal obligations, to resolve disputes, prevent fraud and abuse, enforce our Terms or other agreements, and/or protect our legitimate interests. Where your Personal Data is no longer required for these purposes, we will delete it.

The retention of the Personal Data collected by way of cookies or other similar tracking technology for profiling is governed by:

- Google Analytics where it will be retained for 38 months; and

Your rights: When successfully shown that you are the owner of certain IP addresses at a certain time, we provide you with all the information we have about it. You may request erasure of those IP addresses from our logs which we will comply if there is no regulation or obligation requiring it to be kept.

### **Transfer of Personal Data**

We transfer your Personal Data to other countries for the purposes specified above including the countries which may not provide the same level of data protection as your home country which we shall use our best effort to protect your Personal Data. Such transfer of your Personal Data will allow you to interact efficiently with our Site.

### **Third Party Wallet Extensions**

In order to facilitate cryptocurrency transactions we use third party electronic wallet extensions such as (but not limited to) MetaMask. Your interactions with MetaMask and/or any third party electronic wallet extensions are governed by the applicable privacy policies.

### **Your Rights**

You have the following rights:

- Right to access: Upon your proof of identity, you have the right to request a copy of your Personal Data which we will provide you in electronic form only. You will be subject to our charge in case you request for multiple copies of your Personal Data.
- Right to rectification: You have the right to request us to amend, update or correct any part of your Personal Data.
- Right to deletion: You may request that we delete your Personal Data processed by us, except that we are required to retain such Personal Data to comply with any legal requirements or legal claims.
- Right to objection: You have the right to object to our processing on grounds relating to your reasonable and particular situation. We will follow your request unless we have legitimate grounds for the processing which override your interests and rights.
- Right to withdrawal: If you have consented to our processing of your Personal Data, you have the right to withdraw your consent at any time, free of charge. Your right includes the cases you wish to opt out from our marketing communication and material that you receive from us

To request your Personal Data pursuant to this policy, please contact Opn at [legal@opn.ooo](mailto:legal@opn.ooo)

**Changes to Privacy Policy**

We reserve the right to change this Privacy Policy at any time to reflect changes in the law, our data collection and use practices, the features of our Services Site, or advances in technology. Please check this page periodically for changes. Your continued use of the Services following the posting of changes to this Privacy Policy will mean you accept those changes.