

Date: 26.08.2024

Date of the last revision: 26.08.2024

## **Important Information**

This Privacy Policy (“**Policy**”) outlines how DeltaPrime (“**we**,” “**our**,” “**us**”) collects, processes, and safeguards your data (meaning any information provided by you), including your Personal Data (meaning any information which is related to an identified or identifiable natural person – later referred to as “**Personal Data**”) when you use our Site or DeFi Protocol (as defined in the Terms). This Policy forms part of our Terms of Use (“**Terms**”), which you can find [here](#), and should be read and interpreted together. Each capitalized term used in the Policy should have the meaning described in the Terms unless the Policy defines them otherwise. By using this Site or DeFi Protocol, you confirm that you have read, understood, and accept all of the terms and conditions contained in this Policy. The Policy applies to every territory where DeltaPrime is available except the United States.

**PUBLIC BLOCKCHAINS ARE DISTRIBUTED LEDGERS DESIGNED TO RECORD TRANSACTIONS ACROSS COMPUTER NETWORKS PERMANENTLY. SINCE BLOCKCHAINS ARE DECENTRALIZED OR MANAGED BY THIRD PARTIES AND NOT CONTROLLED BY DELTAPRIME, WE CANNOT DELETE, MODIFY, OR ALTER ANY DATA RECORDED ON THESE NETWORKS, EVEN IF THE DATA WAS ENTERED THROUGH DEFI PROTOCOL.**

### **1. Data controller of Personal Data**

1.1. Any Personal Data on the Site is be controlled by us:

**Prime Labs Distributed Ltd.**

**Intershore Chambers, P.O. Box 4342,**

**Road Town, Tortola, British Virgin Islands**

1.2. We have not appointed a data protection officer or a person of equivalent competence.

1.3. For all matters relating to data protection, you can contact us at [privacy@deltaprime.io](mailto:privacy@deltaprime.io).

### **2. Data We Collect**

2.1. When you use the Site:

2.1.1. we may collect and process the following data:

- 2.1.1.1. Personal Data:
  - 2.1.1.1.1. First and last name – if you provide it to us in the contact form ([link](#)) or via [contact@deltaprime.io](mailto:contact@deltaprime.io), [Discord](#), or [Telegram](#) (“**Contact Channels**”);
  - 2.1.1.1.2. Contact information you provided through Contact Channels, in particular, your e-mail address;
  - 2.1.1.1.3. Other data you decide to include in the messages or documents sent through Contact Channels, in particular , wallet address, or Prime Account address.
- 2.1.1.2. Other data – all information unrelated to an identified or identifiable natural person.
- 2.1.2. You choose to provide the information listed in sec. 2.1.1.1. voluntarily to the extent you decide to. You are responsible for the content and the extent of the information you provide. Please limit the extent of Personal Data provided to us to an absolute minimum. If you are contacting us in response to a job announcement, please limit the scope of the Personal Data to those usually provided in recruitment processes.
- 2.1.3. If you provide us with the Personal Data of a specific, identified third person, you must obtain their express permission to provide their Personal Data to us before you do so. If you are entitled to provide personal data of third persons to us under generally applicable law, you must comply with all the obligations that the law imposes on you, e.g., inform them about such data provision before you do so.
- 2.2. When you use the DeFi Protocol:
  - 2.2.1. We do not collect nor process any Personal Data.
  - 2.2.2. We only process the following data regarding your usage of the DeFi Protocol:
    - 2.2.2.1. IP address – we automatically collect the internet protocol address to restrict access from the Restricted Territories (according to sec. 1.2. of the Terms);
    - 2.2.2.2. Blockchain available data –we process only public blockchain data, such as protocol deposits, borrows, the solvency of accounts, and transactions performed. We do not aggregate this data with other information, so we are not able to determine any Personal Data in this way; we do not collect any data from MetaMask or Rabby wallets;

- 2.2.2.3. Information from tracking technologies – we may access and collect such information as cookies files (that let us collect the information of your browser type, operating system, or device ), web beacons, and similar technologies that allow us to personalize the services accessible for you through DeFi Protocol across sessions.

### **3. How we use the data**

- 3.1. We use the data and Personal Data collected through the Site to:
  - 3.1.1. Receive, analyze, and consider your application provided – if you contact us in response to the job announcement;
  - 3.1.2. Provide customer support, answer your questions, comply with your requests, or help you in other ways suitable to the situation described in your message – if you contact us for a different reason than indicated in sec. 3.1.1;
  - 3.1.3. To comply with laws, e.g., to verify if the IP address you use to connect to the Site is not from the Restricted Territory.
- 3.2. We use the data collected through the DeFi Protocols to:
  - 3.2.1. Provide, customize, maintain, and improve services provided through the DeFi Protocol;
  - 3.2.2. Verify if you meet the criteria for using our services through the DeFi Protocol, e.g., to verify the balance of your wallet and safeguard the smart contracts you perform;
  - 3.2.3. To operate the Liquidity Pools, e.g., to establish the amount of the tokens available in the pools and broadcast this information on the Site;
  - 3.2.4. To comply with laws, e.g., to verify if the IP address you use to connect to the DeFi Protocol is not from the Restricted Territory.

### **4. Who can access the data**

- 4.1. We may share Personal Data collected through the Site:
  - 4.1.1. with the recruitment providers – only to the extent necessary to complete the recruitment process;
  - 4.1.2. with authorities or advisors, e.g., to comply with legal requirements during a court, compliance, or other legal proceedings – only to the essential extent;
  - 4.1.3. with our advisors or providers if your questions or requests require their involvement – only to the extent necessary to carry out a given task.
- 4.2. We do not share any other Personal Data with third parties.
- 4.3. We may share data collected through the Site:

- 4.3.1. with providers or vendors, e.g., to help us with maintenance and development of the DeFi Protocol or the Site;
- 4.3.2. with authorities or advisors, e.g., to comply with legal requirements during a court, compliance, or other legal or regulatory proceedings;
- 4.3.3. with our advisors or providers if your questions or request require their involvement.
- 4.4. We share data collected through the DeFi Protocol with third-party protocols in the standard information exchange process in the blockchain network.
- 4.5. We share data collected through the contact form (link) with the third-party provider of the FormSubmit service – Devro LABS (company page available [here](#)). You can learn how this third-party provider uses your information, including Personal Data, from their privacy policy available [here](#). If you do not wish to share any data with the third-party provider, please use our e-mail.
- 4.6. We may share data collected through the DeFi Protocol to safeguard, investigate, and restrict fraudulent, unauthorized, or illegal activities. We may also use it to safeguard the DeFi Protocol, e.g., to tackle security vulnerabilities or resolve potential security concerns.

## **5. How we protect the data**

- 5.1. The data collected through the Site:
  - 5.1.1. We allow access to Personal Data only by authorized individuals and only to the extent necessary for the tasks they perform;
  - 5.1.2. We have restricted access to data only to those individuals who deal directly with matters requiring access to them;
  - 5.1.3. We regularly review whether the access range referred to in secs. 5.1.1 and 5.1.2 need to be revised;
  - 5.1.4. If we engage persons from outside DeltaPrime and allow them access to data or Personal Data, we take all necessary actions to ensure that they also guarantee the application of appropriate security measures whenever they process data or Personal Data;
  - 5.1.5. We regularly conduct risk analyses and monitor the adequacy of our security measures. We implement additional measures to enhance data and Personal Data security if necessary.
- 5.2. The data collected through the DeFi Protocol is safeguarded through standard cryptographic techniques, consensus mechanisms, and decentralized architecture.

You can learn how the data is protected from our GitHub Page (available [here](#)) and the security dedicated webpage (available [here](#)).

## **6. Data retention**

- 6.1. We conduct an ongoing review of whether we still need to process data, particularly Personal Data.
- 6.2. We seek to process data, including Personal Data, for the shortest possible period, considering the purpose for which the data is collected and the possibility of defending against claims for which the data or Personal Data may be necessary to let us protect against them. In each case, we process data or Personal Data to the extent applicable legal requirements permit. We reserve the right to process Personal Data for as long as necessary to fulfill the purposes for which we collected it, including satisfying any legal, accounting, or tax requirements.
- 6.3. If you request the deletion of your Personal Data, we may continue to process it to the extent permitted or required under applicable laws for legal, tax, or regulatory reasons or legitimate and lawful business purposes.
- 6.4. Personal Data provided to us in response to a job announcement is only processed for the duration of the recruitment for the specific job vacancy to which you applied.

## **7. Legal basis for processing**

- 7.1. We only process Personal Data if there is a specific legal basis.
- 7.2. Contact Channels:
  - 7.2.1. If you contact us for purposes unrelated to the job recruitment processes:
    - 7.2.1.1. We will process Personal Data solely to communicate and resolve the matter to which it relates;
    - 7.2.1.2. The legal basis for this processing of Personal Data is our legitimate interest, but if you provide us with information that goes beyond what is necessary to resolve your case, the legal basis for processing that Personal Data is your consent;
    - 7.2.1.3. If you are located in the EU, the legal basis is Article 6(1)(f) of the GDPR, and the excessive Personal Data are processed based on Article 6(1)(a) of the GDPR.
  - 7.2.2. If you contact us for purposes related to the job recruitment processes:
    - 7.2.2.1. We expect you to provide us only with Personal Data to the extent necessary to review your application and permitted by the applicable law;

- 7.2.2.2. The legal basis for processing this Personal Data is taking actions required to conclude a contract;
- 7.2.2.3. If you provide additional information beyond that indicated in sec. 7.2.2.2, the legal basis for processing this Personal Data is your consent;
- 7.2.2.4. If you are located in the EU, the legal basis is Article 6(1)(b) of the GDPR, and the excessive Personal Data are processed based on Article 6(1)(a) of the GDPR;
- 7.2.2.5. We may also retain your Personal Data contained in your job application after the recruitment process has been completed to defend against possible claims (e.g., on the grounds of discrimination) - the legal basis for processing your data is then our legitimate interest (if you are from the European Union, then Article 6(1)(f) GDPR).

### 7.3. Cookies:

#### 7.3.1. If the cookies used by the Site contain Personal Data:

- 7.3.1.1. The cookie files may contain such Personal Data as IP address and other information collected through cookies;
- 7.3.1.2. The legal basis for the essential cookies (sec. 9.4.3) is our legitimate interest (if you are from the European Union, then Article 6(1)(f) GDPR);
- 7.3.1.3. The legal basis for the optional cookies (sec. 9.4.4) is your consent (if you are from the European Union, then Article 6(1)(a) GDPR). The analytical cookies use profiling in some cases. This means that we may evaluate selected factors through automated processing to analyze your behavior or create a forecast for the future. This allows the content to be better tailored to your preferences and interests.

- 7.4. We do not need a legal basis to process other data, but in any case, we do so on the basis of your consent, because of our legitimate interest, or because we are obliged to do so by law.

## **8. Rights in connection with Personal Data**

### 8.1. You may have the right to:

- 8.1.1. Request information about the processing of your Personal Data – we will provide you with information on whether we process any of your Personal Data at all. If so, we will also inform you with additional required by your

information about the data processing, in particular, the purposes and legal ground for processing, the scope of Personal Data we process, the entities to whom we disclosed your Personal Data, and the planned date of its deletion;

- 8.1.2. Request access to your Personal Data—this allows you to receive a copy of Personal Information we process and check whether it is processed lawfully;
- 8.1.3. Request a copy of your Personal Data—we will provide you with a copy of your Personal Data we process in the form of your choice, insofar as possible; if not, we will provide the data in another commonly used format;
- 8.1.4. Request correction of your Personal Data—We will rectify any inconsistencies or errors in Personal Data processed and complete them if they are incomplete.
- 8.1.5. Object to processing your Personal Data – when we rely on legitimate interest, other than for marketing purposes, to process your Personal Data, if there is something about your particular situation that makes you want to object to processing on this ground. Such objection shall be justified;
- 8.1.6. Object to the processing of your Personal Data for marketing purposes – you can object to the processing of your Personal Data for marketing purposes at any time, and you do not have to provide a justification;
- 8.1.7. Request the restriction of processing of your Personal Data – if such a request is made, we will cease performing any operations on your Personal Data, except for operations authorized by you or necessary for retention rules, until the reasons for the restriction of data processing cease to exist (e.g., a decision by a supervisory authority allowing further processing is issued);
- 8.1.8. Request the transfer of your Personal Data to another party – If we process your Personal Data through automated means in relation to the contract or consent, we will provide your Personal Data in a machine-readable format. You can also request to have this data transferred to another entity as long as its technical capabilities allow it;
- 8.1.9. Withdraw your consent to process your Personal Data – if your Personal Data are processed based on your consent, you can withdraw it at any time. However, it does not affect the lawfulness of the processing carried out before the withdrawal;
- 8.1.10. Make a complaint to the supervisory authority – if you think that processing of your Personal Data is unlawful, you may file a complaint with the supervisory entity that has jurisdiction over your habitual place of residence. If you are in the EU, you can also file a complaint to the competent supervisory

authority, which can be found [here](#). If you are in the UK, you can also file a complaint [here](#).

- 8.2. The rights indicated in sec. 8.1 are not absolute, and we reserve all available rights under applicable law to the extent acceptable to us.
- 8.3. A request for the exercise of your rights may be submitted to us:
  - 8.3.1. By email at [privacy@deltaprime.io](mailto:privacy@deltaprime.io), or
  - 8.3.2. By mail to:  
Prime Labs Distributed Ltd.  
Intershore Chambers, P.O. Box 4342,  
Road Town, Tortola, British Virgin Islands.
- 8.4. If we are unable to identify you based on the request made, we will request additional information from you. It is not mandatory to provide such data, but failure to do so will result in the request being refused.
- 8.5. You can request in person or through a third person (e.g., proxy).
- 8.6. We will respond to your request within one month of receipt. If we need to extend this deadline, we will inform you.

## **9. Cookies, Analytics & Marketing**

- 9.1. We use cookies, analytics tools, and web beacons on the Site to enable and facilitate using it.
- 9.2. Cookies may contain Personal Data if the information they provided may be linked to an identified or identifiable person.
- 9.3. We use cookies for analytics and marketing purposes.
- 9.4. We use the following types of cookies:
  - 9.4.1. Session** – they track your actions as you navigate on the Site. They are stored temporarily and deleted when your browser is closed;
  - 9.4.2. **Permanent** – they save your preferences and settings for future visits to the Site. They are removed after a predetermined timeframe;
  - 9.4.3. **Essential** - they ensure the proper functioning of the Site and its essential functions. Without them, you could not use our Site and its services properly, and this is why we do not have to ask for your consent to use them;
  - 9.4.4. Optional:**
    - 9.4.4.1. Analytics** - they enable us to track the number and sources of your visits to the Site so that we can measure and improve the performance of it. This type of cookie helps us understand which pages are most or least visited and how visitors navigate the Site. If



you refuse to have analytical cookies stored on your device, your visit will not be included in our statistics, but at the same time, it will not restrict any functionality of the Site for you;

9.4.4.2. **Marketing** – we use them to personalize the content displayed on the Site. Marketing cookies may be used in our advertising campaigns that are run on third-party websites. If you consent to the use of marketing cookies, you may receive information about the websites of our trusted partners where you have responded to our advertising. If you opt out of marketing cookies, you will be shown generic and non-personalized advertisements. If you refuse to store marketing cookies on your device, you will not be restricted from any Site functionality;

**9.4.4.3. Functional** – They store and customize the Site according to your choices, e.g., language preferences. You can set your browser to block or alert you to essential and functional cookies, but this will result in some parts of the Site not working correctly;

9.4.4.4. **Third-party cookies** - We use services provided by third parties (currently: Google Analytics and HotJar) on the Site to collect information about your use of it and the services provided. These fall within the 9.4.4.1-9.4.4.2 categories. You can opt out of each or all of them, and it will not restrict the Site's functionality for you. You can learn how third-party providers use your information or Personal data from their privacy policies:

**9.4.4.4.1.** for Google Analytics is available [here](#);

9.4.4.4.2. for HotJar is available [here](#).

9.5. Consent to the installation of Optional cookies:

9.5.1. Consent is not required to install and use the Essential cookies (sec. 9.4.3);

9.5.2. We only install and use the Optional cookies (sec. 9.4.4) with your consent;

9.5.3. Upon your first visit to the Site, a banner will inform you that cookies are used;

9.5.4. By selecting the "Allow all" option, you are giving consent for all Optional cookies (secs. 9.4.4.1-9.4.4.4) to operate on the Site, affirming that you have read and agreed to the Policy.

9.6. Not agreeing to the installation of the Optional cookies:

9.6.1. If you do not want our cookies stored on your device, select the "Reject All" option;

- 9.6.2. By choosing this option, you will reject all Optional cookies, but the Essential cookies used on the Site will still be installed and used.
- 9.7. Modifying your cookie settings:
  - 9.7.1. You can manage your cookie preferences in detail by selecting the "Personalize" option on the cookie banner displayed to you;
  - 9.7.2. This option does not apply to the essential cookies (sec. 9.4.3).
- 9.8. Remember that you can change your consent regarding the cookies at any time.

## 10. International transfers

- 10.1. We may process and transfer Personal Data outside of the EEA and UK.
- 10.2. Any processing or transfer of Personal Data we should perform is in accordance with the appropriate transfer mechanisms.
- 10.3. If we decide to process or transfer Personal Data in a country that has not been deemed by the EU as a country with an adequate level of data protection (you can see the current list [here](#)), we will ensure that this country meets the highest standards of data protection and we will conclude an appropriate contract with the entity providing to us services connected to Personal Data, in particular, we will conclude a contract based on standard contractual clauses published by the European Commission (you can access them [here](#)).

## 11. Persons under the age of 18

- 11.1. The Site and the DeFi Protocol are not intended for individuals under 18, and we do not knowingly collect Personal Data from them.
- 11.2. If we inadvertently process Personal Data from a person under 18, we will take legally permissible measures to remove that data from our records
- 11.3. If you, as a parent or guardian of a person under 18, become aware of processing the Personal Data of such a person by us, we kindly request that you contact us via one of our Contact Channels.

## 12. Updates

- 12.1. The current Policy is available at <https://deltaprime.io/privacy-policy>
- 12.2. The Policy may be regularly reviewed and updated as required. Each revision will include information on when it was last reviewed. You are advised to check the Policy periodically to familiarize yourself with any changes to it. Please observe what version of the Policy applies to you before you visit the Site or enter into any transaction using DeFi Protocol.

- 12.3. Changes are binding on users of the Site and will take effect immediately upon posting. You agree to be bound by any changes, variations, or modifications to the Policy, and your continued use of the Site shall constitute acceptance of any such changes, variations, or modifications.