

Privacy Policy

Effective as of 1/3/23

This Privacy Policy describes how Nexus Pro, Inc. d/b/a Cardinal ("**Cardinal**," "**we**", "**us**" or "**our**") processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including as applicable, our website, social media pages, marketing activities, live events and other activities described in this Privacy Policy (collectively, the "**Service**")).

Please see the Notice to European Users section for additional information for individuals located in the European Economic Area, United Kingdom, or Switzerland (which we refer to as "**Europe**", and "**European**" should be understood accordingly) below.

We may provide additional or supplemental privacy policies to certain individuals, such as job applicants, or for specific products or services that we offer at the time we collect personal information.

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- Other users, such as when another user organizes an event (such as claiming non-fungible token tickets) through the Service and shares with us the email addresses of individuals invited to participate in such events.
- Public sources, such as government agencies, public records, social media platforms, public blockchains and ledgers, and other publicly available sources.
- Marketing partners, such as joint marketing partners and event co-sponsors.
- Third-party services, such as virtual currency account services you link to the Service. This data may include your wallet address and other information associated with your account on that third-party service that is made available to us based on your account settings on that service.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

Cookies and similar technologies. Some of the automatic collection described above may be facilitated by the following technologies:

How we use your personal information

Service delivery and operations. We may use your personal information to:

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- Direct marketing. We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing

communications as described in the Opt-out of marketing section below.

- Interest-based advertising. Our third-party advertising partners may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms.

Events, promotions and contests. We may use your personal information to:

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

Compliance and protection. We may use your personal information to:

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create aggregated, de-identified and/or anonymized data. We may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Cookies and similar technologies. In addition to the other uses included in this section, we may use the Cookies and similar technologies described above for the following purposes:

How we share your personal information

Your choices

Opt-out of communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Blocking images/clear gifs: Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

Advertising choices. You may be able to limit use of your information for interest-based advertising through the following settings/options/tools:

- Browser settings. Changing your internet web browser settings to block third-party cookies.
- Privacy browsers/plugin-ins. Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
- Platform settings. Google and Facebook offer opt-out features that let you opt-out of use of your information for interest-based advertising. You may be able to exercise that option at the following websites:
 - Google: <https://adssettings.google.com/>
 - Facebook: <https://www.facebook.com/about/ads>

- Ad industry tools. Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
 - Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp
 - Digital Advertising Alliance: optout.aboutads.info.
 - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- Mobile settings. Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Linked third-party platforms. If you choose to connect to the Service through your social media account or other third-party platform, such as virtual currency account services you link to the Service, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country. For more information on how we transfer your personal information from Europe, please see the Notice to European Users.

Children

The Service is not intended for use by anyone under 16 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through the Service from a child without the consent of the child’s parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this

Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

How to contact us

Notice to European Users

General. European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no good reason for us continuing to process it - you also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information, for example if you want us to establish its accuracy or the reason for processing it.
- **Object.** Object to our processing of your personal information where we are relying on Legitimate Interests – you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time.

Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Transactional data**, such as blockchain transaction history and other information associated with your linked cryptocurrency wallet.
- **User-generated content data**, such as images, avatars, logo image, cover image, collection description, and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data.
- **Information you make available when you submit a form or application to us**, such as information provided when you fill out our rental configuration forms or staking pool forms.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, social media, or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Other users**, such as when another user organizes an event (such as claiming non-fungible token tickets) through the Service and shares with us the email addresses of individuals invited to participate in such events.
- **Public sources**, such as government agencies, public records, social media platforms, public blockchains and ledgers, and other publicly available sources.
- **Private sources**, such as data providers and data licensors.
- **Marketing partners**, such as joint marketing partners and event co-sponsors.
- **Third-party services**, such as virtual currency account services you link to the Service. This data may include your wallet address and other information associated with your account on that third-party service that is made available to us based on your account settings on that service.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of

access, and whether you have opened our emails or clicked links within them.

Cookies and similar technologies. Some of the automatic collection described above may be facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users' web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a session ends, "persistent cookies" that remain longer, "first party" cookies that we place and "third party" cookies that our third-party business partners and service providers place.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

Data about others. We may offer features that help users invite their friends or contacts to use the Service, and we may collect contact details about these invitees so we can deliver their invitations. Please do not refer someone to us or share their contact details with us unless you have their permission to do so.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery and operations. We may use your personal information to:

- provide, operate and improve the Service and our business;
- personalizing the service, including remembering the devices from which you have previously logged in and remembering your selections and preferences as you navigate the Service;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
- communicate with you about events or contests in which you participate;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.

- **Interest-based advertising.** Our third-party advertising partners may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms.

Events, promotions and contests. We may use your personal information to:

- administer promotions and contests;
- communicate with you about promotions or contests in which you participate; and
- contact or market to you after collecting your personal information at an event.

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create aggregated, de-identified and/or anonymized data. We may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Cookies and similar technologies. In addition to the other uses included in this section, we may use the [Cookies and similar technologies](#) described above for the following purposes:

- **Technical operation.** To allow the technical operation of the Service, such as by remembering your selections and preferences as you navigate the site.
- **Functionality.** To enhance the performance and functionality of our services.
- **Advertising.** To help our third-party advertising partners collect information about how you use the Service and other online services over time, which they use to show you ads on other online services they believe will interest you and measure how the ads perform.

- **Analytics.** To help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.

Affiliates. Our corporate parent, subsidiaries, and affiliates.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, Remote Procedure Call nodes, customer support, email delivery, marketing, consumer research and website analytics).

Advertising partners. Third-party advertising companies for the [interest-based advertising purposes](#) described above.

Third parties designated by you. We may share your personal information with third parties where you have instructed us or provided your consent to do so. For example, we may share your personal information with third-party advertisers with whom we are collaborating to offer you additional services such as sweepstakes, raffles, and promotions. We will share personal information that is needed for these other companies to provide the services that you have requested.

Partners. We may sometimes share your personal information with partners or enable partners to collect information directly via our Service. For example, Google and Asana. You may view their privacy policies at <https://policies.google.com/privacy?hl=en-US> and <https://asana.com/terms> respectively.

Business and marketing partners. Third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Linked third-party services. If you log into the Service with, or otherwise link to a third-party service, such as virtual currency account services you link to the Service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [Compliance and protection purposes](#) described above.

Business transferees. We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in Cardinal, financing of Cardinal, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Cardinal as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Other users and the public. Transactional data, user-generated content data (except for messages), and certain information you make available when you submit a form to us (such as information about your rental collection) are visible to other users of the Service and the public. This information can be seen, collected and used by others, including being cached, copied, screen captured or stored elsewhere by others (e.g., search engines), and we are not responsible for any such use of this information.

Your choices

In this section, we describe the rights and choices available to all users.

Opt-out of communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Cookies. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org. You can also configure your device to prevent images from loading to prevent web beacons from functioning.

Blocking images/clear gifs: Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

Advertising choices. You may be able to limit use of your information for interest-based advertising through the following settings/options/tools:

- **Browser settings.** Changing your internet web browser settings to block third-party cookies.
- **Privacy browsers/plugin-ins.** Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
- **Platform settings.** Google and Facebook offer opt-out features that let you opt-out of use of your information for interest-based advertising. You may be able to exercise that option at the following websites:
 - Google: <https://adssettings.google.com/>
 - Facebook: <https://www.facebook.com/about/ads>
- **Ad industry tools.** Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
 - Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp
 - Digital Advertising Alliance: optout.aboutads.info.
 - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- **Mobile settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes.

We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Linked third-party platforms. If you choose to connect to the Service through your social media account or other third-party platform, such as virtual currency account services you link to the Service, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country. For more information on how we transfer your personal information from Europe, please see the Notice to European Users.

Children

The Service is not intended for use by anyone under 16 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

How to contact us

- **Email:** info@cardinal.so
- **Mail:** 584 Castro Street #2189, San Francisco, CA 94114

Notice to European Users

General

Where this Notice to European users applies. The information provided in this “Notice to European users” section applies only to individuals in the European Economic Area, United Kingdom, and Switzerland (i.e., “**Europe**” as defined at the top of this Privacy Policy).

Personal information. References to “personal information” in this Privacy Policy should be understood to include a reference to “personal data” as defined in the “**GDPR**” (i.e., the [EU GDPR](#) and the so-called ‘[UK GDPR](#)’). This means information about individuals from which they are either directly identified or can be identified.

Controller. Nexus Pro, Inc. is the controller in respect of the processing of your personal information covered by this Privacy Policy for purposes of the GDPR. See the ‘How to contact us’ section above for our contact details.

[Our GDPR Representatives. We have appointed the following representatives in Europe as required by the GDPR – you can also contact them directly should you wish:

Our Representative in the EU. Our EU representative appointed under the EU GDPR is [insert]. You can contact them:

- By email to: datarequest@datarep.com
- By postal mail to:
3rd and 4th floor, Altmarkt
10 B/D, Dresden, 01067, Germany

Our Representative in the UK. Our UK representative appointed under the UK GDPR is [insert]. You can contact them:

- By email to: datarequest@datarep.com
- By postal mail to: 107-111 Fleet Street,
London, EC4A 2AB, United Kingdom

Our legal bases for processing

In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a “legal basis” for that use.

Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to perform a contract, we are about to enter into or have entered into with you (“**Contractual Necessity**”).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”). More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information for is set out in the table below.
- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the Purpose in question (“**Consent**”).

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your personal information – for more information on these Purposes and the data types involved, see ‘How we use your personal information’

Purpose	Categories of personal information involved	Legal basis
Service delivery and operations	<p>Transactional data</p> <p>User-generated content data</p> <p>Information you make available when you submit a form to us</p> <p>Payment data needed to complete transactions</p>	<p>Contractual Necessity</p> <p>Legitimate Interests. Where Contractual Necessity is not applicable, we have a legitimate interest in providing you with a good service.</p>
Research and development	<p>Transactional data</p> <p>User-generated content data</p> <p>Device data</p> <p>Online activity data</p>	<p>Legitimate Interests. We have a legitimate interest in analysing the way our Service are used in order that we develop and improve our Service.</p> <p>Consent, in respect of any optional cookies used for this purpose.</p>
Marketing and advertising	<p>Communications data</p> <p>Marketing data</p>	<p>Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organisation and sending marketing communications for that purpose.</p> <p>Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.</p>
Events, promotions and contests	<p>Communications data</p> <p>Marketing data</p>	<p>Contractual Necessity to administer the promotions and contests in accordance with the terms or rules thereof (including communicating with you as and where necessary).</p> <p>In respect of promoting these promotions and contests:</p> <ul style="list-style-type: none"> • Legitimate Interests – we have a legitimate interest in promoting these promotions and contests, including associated publicising of our business and operations. • Consent – in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given promotional communications.

Purpose	Categories of personal information involved	Legal basis
Service improvement and analytics	Device data Online activity data	Legitimate Interests. We have a legitimate interest in offering you a good service, including by improving our Service based on how you use our Service.
Compliance and protection	Any and all data types relevant in the circumstances	Compliance with Law. Legitimate interest. Where Compliance with Law is not applicable, we and any relevant third parties have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety.
To create aggregated, de-identified and/or anonymized data	Any and all data types relevant in the circumstances	Legitimate interest. We have a legitimate interest in aggregating, de-identifying and/or anonymizing your personal information to help us better understand how our Service are used.
Further uses	Any and all data types relevant in the circumstances	The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the Personal Information was collected. Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.

Retention

We retain personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for compliance and protection purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information, we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

Other info

No sensitive personal information. We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the services, or otherwise to us. If you provide us with any sensitive personal information to us when you use the Service, we will ask you to consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our services.

No Automated Decision-Making and Profiling. As part of the Service, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects.

Your rights

General. European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no good reason for us continuing to process it - you also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information, for example if you want us to establish its accuracy or the reason for processing it.
- **Object.** Object to our processing of your personal information where we are relying on Legitimate Interests – you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time.

Exercising These Rights. You may submit these requests by email to team@cardinal.so or our postal address provided above. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions.

Your Right to Lodge a Complaint with your Supervisory Authority. In addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

- *For users in the European Economic Area* – the contact information for the data protection regulator in your place of residence can be found here: <https://edpb.europa.eu/about-edpb/>

[board/members_en](#)

- *For users in the UK* – the contact information for the UK data protection regulator can be found here: <https://ico.org.uk/make-a-complaint/>
- *For users in Switzerland* – the contact information the Swiss data protection regulator can be found here: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>

Data Processing outside Europe

We are a U.S.-based company and many of our service providers, advisers, partners or other recipients of data are also based in the U.S. This means that, if you use the Service, your personal information will necessarily be accessed and processed in the U.S. It may also be provided to recipients in other countries outside Europe.

It is important to note that the US is not the subject of an ‘adequacy decision’ under the GDPR – basically, this means that the U.S. legal regime is not considered by relevant European bodies to provide an adequate level of protection for personal information, which is equivalent to that provided by relevant European laws.

Where we share your personal information with third parties who are based outside Europe, we try to ensure a similar degree of protection is afforded to it by making sure one of the following mechanisms is implemented:

- **Transfers to territories with an adequacy decision.** We may transfer your personal information to countries or territories whose laws have been deemed to provide an adequate level of protection for personal information by the European Commission or UK Government (as and where applicable) (from time to time).
- **Transfers to territories without an adequacy decision.**
 - We may transfer your personal information to countries or territories whose laws have **not** been deemed to provide such an adequate level of protection (e.g., the U.S., see above).
 - However, in these cases:
 - we may use specific appropriate safeguards, which are designed to give personal information effectively the same protection it has in Europe – for example, standard-form contracts approved by relevant authorities for this purpose; or
 - in limited circumstances, we may rely on an exception, or ‘derogation’, which permits us to transfer your personal information to such country despite the absence of an ‘adequacy decision’ or ‘appropriate safeguards’ – for example, reliance on your explicit consent to that transfer.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.