

Effective: April 12, 2024

NEAR Vault Privacy Policy

Arcus Pluvius Limited ("APL") is committed to protecting and respecting your privacy. This Privacy Policy describes how your personal or behavioral data is collected, used, and stored when you access <https://nearvault.org/> (the "Site"). This Privacy Policy may be modified from time to time which will be indicated by changing the date at the top of this page. Your use of the Site is at all times subject to the Terms of Use, which incorporates this Privacy Policy.

1. Acceptance of the Privacy Policy

By accessing the Site, you signify acceptance to the terms of this Privacy Policy. Where required by law, you will be asked for your consent to the collection and use of your information as described further below.

Additional "just-in-time" disclosures or information about the data processing practices of specific services may be provided. These notices may supplement or clarify the privacy practices applicable to the Site or may provide you with additional choices about how your data is processed. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of the Site. You may only access the Site if you are above the age of majority in your jurisdiction of residence.

2. What does this Privacy Policy cover?

This Privacy Policy sets forth our policy for collecting or using personal or behavioral data in connection with users' access and usage of the Site.

3. The Information We Collect

APL **does not** collect your personal information and does not use any automatic tracking technologies. The Service (as defined in the Terms of Use) leverages blockchain technologies that use only public information available on the blockchain.

- **APL does not collect personal information.** You are not required to provide any personal information to the Site. However, the transactions conducted from your wallets are publicly accessible on blockchain networks accessed through the Site.

- **APL does not track IP addresses.** Where third parties collect IP addresses by default: (1) manual removal of IP tracking is requested, and (2) IP data is anonymized to prevent product analytics services from receiving IP data.

- **Google analytics may be used on the Site.** APL may use Google Analytics for purposes of monitoring action on the Site. All IP addresses are anonymized.

- **APL does not store message data.** APL does not store personal or message information or in any way use information to associate or cross-associate wallet data.

- **Do Not Track policy.** Some internet browsers include the ability to transmit "Do Not Track" or "DNT" signals. Since uniform standards for "DNT" signals have not been adopted, the Site does not currently process or respond to "DNT" signals.

4. Use Usage Data

APL collects anonymous usage information to improve the UX of the Site. To protect your privacy we collect no personal information and collect as little use information as possible.

5. Sharing of the Personal Information

We do not share or sell the personal information that you provide us with other organizations without your express consent, except as described in this Privacy Policy.

6. How we Protect and Store Information

The safety and security of your personal information also depends on you. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. Your wallet is protected by your password, private key, and/or seed phrase, and we urge you to take steps to keep this and other personal information safe by not disclosing your security credentials or leaving your wallet open in an unsecured manner. We seek to protect personal information by refraining from collecting personal information where possible. However, these measures do not guarantee that your personal information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. By using the Site, you acknowledge that you understand and agree to assume these risks.

7. International Transfers of Personal Data

If you are a resident of the European Economic Area ("EEA") or Switzerland, you may have additional rights under the General Data Protection Regulation (the "GDPR") and other applicable law with respect to your Personal Data.

For this section, we use the terms "**Personal Data**" and "**processing**" as they are defined in the GDPR, but "**Personal Data**" generally means information that can be used to individually identify a person, and "processing" generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. APL will be the controller of your Personal Data processed in connection with the Site.

8. Social Media

We may use social and developer networks such as Discord, Twitter, Gitbook and Github. When you use them, the operators of the respective social and developer networks and may record that you are on such networks. This processing of your personal data lays in the responsibility of these networks and occurs according to their privacy policy. Please check with these individual social and developer networks regarding their privacy policies. APL is not responsible for data collected by these networks. We only use these platforms to inform our community of updates and answer user questions.

9. What Personal Data Do We Collect from You?

We collect no Personal Data from you. Please see the section "The Information We Collect" for further details.

10. What If You Have Questions Regarding this Privacy Policy?

If you have any questions about this section or our data practices generally, please contact notices@arcuspluvius.org.