

Privacy Policy

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This privacy policy (the “**Privacy Policy**”) explains how **Baptisia Ventures Inc.** (**we**, “**our**” and “**us**”) collects, uses, stores and discloses information about users (“**users**”, “**you**” and “**your**”) through our websites, forums and blogs (collectively the “**Sites**”) and our web applications and other online products and services (collectively, the “**Services**”) or when you otherwise interact with us.

By using the Sites or the Services, you accept the terms of this Privacy Policy and our terms of service (the “**Terms of Service**”), and consent to our collection, use, disclosure, processing and retention of Personal Information (as defined below) and other information (or the Personal Information or other information of any individual you provide) as described in this Privacy Policy. If you have not done so already, please also review our Terms of Service. The Terms of Service contain provisions that limit our liability to you and require you to resolve any dispute with us on an individual basis and not as part of any class or representative action. If you do not agree with any part of this Privacy Policy or our Terms of Service, then please do not use the Sites or any of the Services.

If you submit Personal Information relating to other people to us or to our service providers in connection with the Services, you warrant that you have obtained the necessary consents from such individual and have authority to disclose their Personal Information to us, as well as their consent to our collection, use and disclosure of such personal data, for the purposes set forth in this Privacy Policy.

For purposes of this Privacy Policy, “**Personal Information**” means any information, recorded or unrecorded, which, either on its own or in combination with other information, could be used to identify, contact, or locate a specific individual. Personal Information includes, but is not limited to, an individual’s name, residential address, age, income, date of birth, gender, ethnic origin, credit history, employment information, social security number (or the equivalent), where applicable, payment records, credit card number, financial information, device geolocation (geographical location), unique identifiers such as user name, account number or password or any other identifying number assigned to the individual, and product or service preferences.

1. Collection of Information

(a) Information You Provide To Us

We collect Personal Information and other information you provide directly to us. This may include:

- (i) information establishing identity (e.g. individual name, organization name, address, phone number, email address, date of birth, gender and, if applicable, account numbers);
- (ii) phone number and details of the device you use (for example, your phone, computer or tablet);
- (iii) your registration information to use the Services;
- (iv) information you provide to prove you are eligible to use our Services;
- (v) feedback and correspondence, such as information you provide in your responses to surveys, when you participate in market research activities, report a problem with the Services, receive customer support or otherwise correspond with us;
- (vi) usage information, such as information about how you use the Services and interact with us; and
- (vii) marketing information, such as your preferences for receiving marketing communications and details about how you engage with them.

(b) How we Obtain Personal Information

Most of the information we collect is received from you directly, including when you:

- (i) fill in any forms;
- (ii) correspond with us;
- (iii) register to use our Services;
- (iv) open an account or use any of our Services;
- (v) take part in online discussions, surveys or promotions;
- (vi) enter a promotion; or
- (vii) contact us for other reasons.

We may also collect information from third parties, including:

- (viii) persons authorized to act on your behalf under a power of attorney or other legal authority;

- (ix) service providers, agents and other organizations with whom you or we conduct business;
- (x) government agencies and public registries; and
- (xi) if you choose to use a third-party platform, such as Facebook, Apple, Google, Instagram or Twitter, to create or access your account. Additionally, if you create or log into your account through a third-party platform, we will have access to certain information on that platform, such as your name, list of friends or followers, birthday, photos and profile picture, in accordance with the authorization procedures determined by such platform.

If you create an account with us, you agree that we may verify your name, address, phone number, and other account details with information about you held by third party sources and your mobile service provider in order to verify your identity and help protect against potential fraud, such as when someone other than you is trying to use your account or conduct a transaction without your permission, and you provide your consent for them to disclose and/or compare your information for this purpose. In these circumstances, this Personal Information will not be shared with any third parties for any other purpose.

You may also be able to specifically request that we have access to the contacts in your device so that you can send a referral link to your family and friends or share your invoices through your device's messaging systems.

The decision to provide us with Personal Information always rests with you. We may however be limited in our ability to provide you with certain Services if you decline to provide us with information essential to fulfill your request.

(c) Automatically Collected Information

When you access or use the Sites or our Services, we automatically collect information about you, which may include:

- (i) Log Information: We may collect log information about your use of the Sites and the Services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to the Sites or our Services.
- (ii) Device Information: We may collect information about the computer or mobile device you use to access the Sites and our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.

- (iii) Information Collected by Cookies and Other Tracking Technologies: We may use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve the Sites, our Services and your experience, see which areas and features of the Sites and our Services are popular and count visits. Web beacons are electronic images that may be used in the Sites and our Services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies and how to disable them, please see “Your Choices” below.
- (iv) Information Store on Your Device. Whenever you use our Sites or Services, we collect information stored on your device, including if you give us access to contact information from your address book, log-in information, photos, videos or other digital content and check-ins (sometimes we call this content information). The Services will regularly collect this information in order to stay up to date.
- (v) We use analytics services such as Plausible Analytics to collect and process certain analytics data. To help us understand how you use our Sites and Services and to help us improve them, we automatically receive information about your interactions with our Sites and Services, like the pages or other content you view and the dates and times of your visits. You can find more information about Plausible Analytics’ data policy here: <https://plausible.io/data-policy>

(d) Information We Collect from Other Sources

We may obtain information from other sources, including third parties, and combine that with information we collect through the Sites and our Services.

(e) Information We Will Never Collect

We will never ask you to share your private keys or wallet seed. Never trust anyone or any site that asks you to enter your private keys or wallet seed.

2. Use of Information

We use the information we collect to enable you to access and use and otherwise provide, maintain, and improve the Sites and our Services. We may also use the information we collect to:

- (i) send you technical notices, updates, security alerts and support and administrative messages and to respond to your comments, questions and customer service requests;

- (ii) communicate with you about products, services, offers, and events offered by us and others, and provide news and information we think will be of interest to you, which may be provided by any means, including by e-mail, in-app notifications, push notifications and display advertising;
- (iii) personalize your experience when you visit or use the Sites or our Services;
- (iv) administer contests, promotions, surveys and other Service features;
- (v) monitor and analyze trends, usage and activities in connection with the Sites and our Services;
- (vi) comply with applicable laws, lawful requests and legal processes, including responding to court orders or requests from regulatory authorities;
- (vii) generate aggregate or de-identified data and use such data for any lawful purpose, including research and analytics; and
- (viii) detect, investigate and prevent fraudulent transactions and other illegal activities, enforce our agreements with users (including our Terms of Service) and protect our rights and property and of others.

3. Sharing of Information

- (a) 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. We disclose Personal Information to third parties under the following circumstances:
 - (i) with vendors, consultants and other service providers who need access to such information to carry out work on our behalf, including hosting, email and database services;
 - (ii) if we believe your actions are inconsistent with our user agreements or policies (including our Terms of Service), or to protect our rights, property and our safety or that of others;
 - (iii) in connection with, or during negotiations of, any proposed or actual merger, sale of company assets, financing, securitization, insuring, acquisition of all or a portion of our business by another company, or bankruptcy transaction or proceeding;

- (iv) between and among us and our current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and
 - (v) With your consent or at your direction.
- (b) In certain instances, we may be compelled to disclose Personal Information in response to a legally valid demand, enquiry, proceeding or other order. We reserve the right to comply with any third party demand such as Requirements to Pay and Requests for Information which have been issued under applicable laws, or any order of a court or administrative tribunal we receive, in request of your Personal Information. You agree that we will not be liable to you in any way for complying with any such third party demands or orders of a court or administrative tribunal issued on or against your accounts or products.

4. Advertising and Analytics Services Provided by Others

We may allow others to provide analytics services and serve advertisements on our behalf across the internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Sites or the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Sites and our Services and other websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices (or <http://www.youronlinechoices.eu> if you are a resident of the European Economic Area).

5. Security

We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

6. Data Retention, Verification, Correction and Deletion

We store the information we collect about you for as long as is necessary for the purposes for which we originally collected it, or for other legitimate business purposes, including to meet our legal or other regulatory obligations, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Terms of Service, and other actions permitted by law. There is no single retention period applicable to the various types of Personal Information collected.

You have the right to: (i) verify what Personal Information we hold about you; (ii) ask for your Personal Information to be corrected or updated; and (iii) withdraw your consent to the use by us of your Personal Information and have it deleted from our records. If you wish to inquire about and verify and / or correct Personal Information we hold about you, or if you wish to have all your Personal Information permanently deleted from our records, please contact us using the contact information below. Please note that deletion of your Personal Information may make it impossible for you to use the Sites or the Services, or certain portions thereof. If you request deletion of your Personal Information, we reserve the right to retain some of your Personal Information for a reasonable time to the extent it is required to be held by us by law, rule or regulation in order to satisfy our legal obligations, or where we reasonably believe that we have a legitimate reason to do so.

7. Disclaimer About Sharing Personal Information Online

You acknowledge that when sharing Personal Information online, there is always a risk of data breaches, including data breaches in which third parties unlawfully access our systems or the systems of our third-party providers, which store Personal Information.

8. Limitation on Liability

While we take measures to protect Personal Information, you agree that in no event will we, our suppliers, partners, licensors, dealers, representatives, associates or affiliates and each of their respective officers, directors, employees, shareholders, representatives and agents (collectively, the “**Company Parties**”) be liable to you or any other person in any way in contract, tort (including negligence), civil liability or otherwise for any claims, damages, obligations, losses, liabilities, costs, debts or expenses (including but not limited to lawyer’s fees and disbursements), whether direct, indirect, special, economic, incidental, consequential, punitive or exemplary, including without limitation loss of revenue, data, anticipated profits or lost business, howsoever caused, including by way of negligence, arising from, related to or connect with the loss or theft of Personal Information. You agree that if, notwithstanding the other provisions of this Privacy Policy, a Company Party is found to be liable for any claims, proceedings, liabilities, obligations, damages, losses or costs, such Company Party’s liability shall in no event exceed the amount you paid to us hereunder during the 6-month period prior to the date on which such claim arose.

9. Transfer of Information to Other Countries

We are based in Canada. However, we may transfer Personal Information to outside agents or service providers (including our affiliates acting in this capacity) that perform services on our behalf, such as customer service and support, marketing and analytics, data hosting or processing services or similar services. Some of these service providers may be located outside of Canada, including the United States, and as a result your Personal Information may be processed in the United States or elsewhere outside of Canada, where local laws may permit

foreign government and national security authorities to access Personal Information in certain circumstances.

10. Residents of the European Economic Area

If you are a resident of the European Economic Area (“**EEA**”), you have certain rights and protections under the law regarding the processing of your personal data. Any reference to Personal Information in this Privacy Policy should be understood as referring to “personal data”, defined under the General Data Protection Regulation (“**GDPR**”) as “any information relating to an identified or identifiable natural person (“**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

(a) Legal Basis for Processing

If you are a resident of the EEA, when we process your personal data we will only do so in the following situations:

- (i) with your consent;
- (ii) to perform the Services you have requested from us or, upon your request, to take the steps necessary to provide you with such Services; or
- (iii) in the furtherance of our legitimate interests in maintaining business relationships and communicating with you as a business contact, about our activities and Services and providing, securing and improving our Services.

You have consented to the processing of your personal data for one or more specific purposes. We consider that our legitimate interests are in compliance with the GDPR and your legal rights and freedoms. You have the right to object to any of this processing and, if you want to, please contact us at the contact details indicated below.

(b) Data Subject Requests

If you are a resident of the EEA, you have the right to access personal data we hold about you and to ask that your personal data be corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, you can contact us as indicated below. Please note that the limitation or deletion of your personal data may mean we will be unable to provide our Services. You also have the right to receive your personal data in a machine-readable format and have the data transferred to another party responsible for data processing.

(c) Questions or Complaints

If you are a resident of the EEA and have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the data privacy authority where you reside. For contact details of your local Data Protection Authority, please see: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

11. Residents of California

California Civil Code Section § 1798.83 permits users who are California residents to request certain information, including the categories of personal information disclosed to third parties for their marketing purposes and the names and addresses of those third parties, regarding our disclosure of personal information to third parties for their direct marketing purposes, if any. If you are a California resident and you have questions about our practices with respect to sharing information with third parties and affiliates for their direct marketing purposes, please contact us at **[insert email address]**.

12. Your Choices

(a) Account Information

You may update, correct or delete information about you at any time by emailing us at **[insert email address]**. Please note that we may retain cached or archived copies of information about you for a certain period of time. You can request to change contact choices, opt-out of our sharing with others, and update your personal information and preferences.

(i) Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Sites and our Services.

(ii) Promotional Communications

You may opt out of receiving promotional communications from us by following the instructions in those communications or by emailing us at **[insert email address]**. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

13. Changes to this Privacy Policy

We may change this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make any changes, we will change the Last Updated date above.

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the changes to the Sites (or as otherwise indicated at the time of posting). In all cases, your continued use of the Sites or the Services after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

14. Eligibility

If you are under the age of majority in your jurisdiction of residence, you may use the Sites or the Services only with the consent of or under the supervision of your parent or legal guardian. If we learn that we have received any information directly from a child under the age of majority applicable to the child without first receiving his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that the child cannot use the Site or the Services and subsequently we will delete that information.

15. Contact Us

You may request access to or correction of your Personal Information in our custody or control, by writing to the address below, attention Compliance Officer. Your right to access or correct your Personal Information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections. If you have any questions about this Privacy Policy, or our Personal Information handling practices generally, please contact us at: **Contact@baptisiaventures.com**