

# PRIVACY POLICY Last updated on January 22th, 2022

Version 1

1. Foreword

https://flyby.forbitswap.com/ (hereinafter the "Website") to benefit from an enhanced user interface. The company develops, operates, and provides an online application that enables You to benefit

The company enables users (hereinafter "Users") registered on the website

from a multi-chain decentralized platform that supports launching auctions and token pools without incurring network congestion (hereinafter the "Service").

For more information regarding the Service, You are invited to read the Terms of Use available on the Website.

The company firmly believes that trust is key to its relationships with You. In this respect, the protection of your personal data and privacy is our top priority. This is why the Company puts

great emphasis on collecting and processing your personal data with the utmost care and in compliance with the applicable legal framework. To inform You transparently, Company has implemented the privacy policy below, which

2. Scope

explains in detail why and how your personal data is processed when You use our Service.

This privacy policy (hereinafter the "Privacy Policy") is intended to inform You, as a visitor or a

User of the Service (hereinafter "You"), through any terminal, application, or device (hereinafter the "Equipment"), about the way the Company processes, as controller, information enabling to

identify You either directly or indirectly (hereinafter "Personal Data") in the context of your use of the Service. 3. Changes to this Agreement If our data processing practices change, we will update this Privacy Policy. The Privacy Policy is

accessible at any time on the Website and prevails over any previous version. The Privacy Policy

### may evolve. The up-to-date version is the one available on the Website. Your continued access to and use of the Interface constitutes your awareness of all amendments made to this Privacy

Services;

sent You.

7. Data recipients

of our Terms of Service.

8. Storage period

Policy as of the date of your accessing and use of the Interface. Therefore, we encourage You to review this Privacy Policy regularly as You shall be bound by it. If for some reason, You are not satisfied with our personal data processing practices, your immediate recourse is to stop using the Interface. You do not have to inform us of this decision unless You intend to exercise some of the data protection rights stipulated by GDPR and defined below in this Privacy Policy. 4. Purpose of Data collection The company collects your Personal Information to provide, maintain, and improve our Services. To be more specific, we primarily use your Personal Information to:

5. Data collected and How to collected

that You request through the Services or that we think You might be interested in; - Track and analyze activities, usage, trends, numbers, and market insights related to our

- Communicate with You about our products, services, technical updates, and any information

- Detect, prevent, and address security or technical issues; - Prevent illegal activities and protect the rights and property of *flyby Launchpad* and the users;
- Facilitate our work with vendors, agents, consultants, and other service providers.
- The company will collect the following data in the manner specifically described below:
- Information You Choose to Share: The company collects information You directly share with us. When You fill out a survey, request support, use any interactive features of the Services, or

communicate with us in other ways, You choose to provide the information to us.

including your IP address, browser type, time of visit, pages viewed, and any other log information typically shared through interacting with websites. We also obtain information about the device You use to access our Services, including operating system, model of the computer or mobile device, mobile network, and any other information about your device.

- Information Collected by Cookies: Cookies are small data files stored on your computer's hard

- IP Address and Device Information: When You use our Services, we collect log information

- drive by websites that You visit. Our Site is using cookies, which help us understand trends and quality of visits. We use information collected by cookies to enhance the effectiveness of our Services and improve your experience. - Email Communication: If You subscribe to our newsletter with your email address, we may from time to time communicate news, updates, promotional information, marketing materials, and other information related to *flyby Launchpad*, and the Services. If You want to opt out of
- The company may also collect and store information that You share with us through email, including inquiries, requests, feedback, and any other information You choose to provide. - Social Media: We are using plugins from social networks such as GitHub, Twitter, Discord, Facebook, Reddit, Medium, YouTube on the Site. When You click on a plugin, the associated social network may collect your data, including the data of your visits on the Site, in accordance

with their respective privacy policies. We are not responsible for data collected by these social

- Information Collected From Other Sources: We may receive information from other sources,

networks. Please check with these social networks on their privacy policies.

receiving such emails from us, You can opt out by clicking "unsubscribe" in any of the emails we

6. Information Regarding Children

Due to the nature of our business, services and benefits are not marketed to minors. *flyby* 

Launchpad does not knowingly solicit Personal Information from children under the age of 18. If

You are under the age of 18, please do not submit any Personal Information to *flyby Launchpad*.

including third-party service providers. This helps us evaluate and improve our Services.

consent, he or she should contact us at contacts@forbitspace.com or hello@forbitspace.com and we will delete such information from our files.

If we learn that we have collected Personal Information directly from a minor, we will delete

such information from our files. If a parent or guardian becomes aware that his or her child

under the age of 18 has directly provided us with Personal Information without his or her

# The company shares your Personal Data with third-party service providers and suppliers which assist Company in fulfilling the purposes specified in this Privacy Policy. The service providers and suppliers may have access to Personal Data for the sole and exclusive purpose of carrying out the missions assigned to them. The company ensures that the service providers and suppliers have sufficient guarantees for the performance of the mission and comply with the applicable laws and regulations. Besides that, we endeavor to only provide them with the minimum information they need to perform their specific function and to require these third parties to safeguard your information.

We will not sell, rent, or trade your Personal Information to any non-affiliated third parties except

investigate, prevent, or take action regarding illegal activities, suspected fraud, front running or

scalping, situations involving potential threats to the physical safety of any person, or violations

In any event, Company communicates your Personal Data to the above recipients on a strictly

need-to-know basis and only as necessary for fulfilling duly identified processing purposes.

as required by law, such as when we reasonably believe it is necessary or appropriate to

described in Article 4 of this Privacy Policy. First, regarding the transfer or exchange of cryptocurrencies, Company will retain your Personal Data until the log-off of your wallet from the Service. Nevertheless, if Company needs to retain your Personal Data for evidence purposes beyond the date on which your wallet is logged off, the maximum retention period applicable will then be in line with the statute of limitation and will not exceed the period during which Company is required to retain evidence.

Second, the cookies' retention period is indicated below, under Article 11.

Company stores Personal Data for a limited duration, not exceeding the fulfillment of purposes

who have an actual need to access your Personal Data. 9. Data Transfer

Transfers to foreign countries must be subject to suitable protection, such as the supervisory

authority's adoption and approval of Standard Contractual Clauses. You may acquire a copy of

the foregoing adequate protection by sending a written request. We may instruct you on how

will archive it and will ensure that access thereto is restricted to a limited number of persons

Third, with respect to the management of your questions and/or requests, Company will not

retain your Personal Data for more than five (5) years following the last contact on your initiative.

Where Company considers it does not need to retain your Personal Data in its active database, it

record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of Personal Data, in particular when blockchain data is combined with other data. We are unable to delete, change, or alter Personal Data on blockchains since they are decentralized or thirdparty networks that we do not control or run. 10. Rights of the User

You may have a number of privacy rights in relation to the use, storage, and processing of your

Personal Data in certain circumstances (e.g., the right to delete your data). Here's a description

Keep in mind that the use of Interface based on public blockchains is intended to immutably

## to obtain such a copy, including your obligation to assume confidentiality commitments in connection with the disclosure of Forbitspace Foundation LLC proprietary and personal information of third parties, as well as the terms of their relationships with the *forbitspace* network.

of your privacy rights:

about yourself corrected.

latter does not apply.

own country.

11. Cookies

seek a copy of the information we have about you.

'block' the processing of your Personal Data.

receive the information and quickly process it.

applicable, have consented to the processing of their data.

Please find below a presentation of Cookies on the Website:

You may accept, refuse and delete certain or all Cookies.

the following URLs: Google; Mozilla Firefox; Safari; Edge, and Opera.

months in the case of a complex request.

- Right to know - we're releasing our Privacy Policy to keep you up to date on what we do with your personal information. You can ask us for Personal Data regarding you that we keep at any time. This data includes, among other things, the data categories we process, the purposes for which we handle them, the origin of the data if we did not obtain it directly from you, and the recipients to whom we have forwarded your data, if applicable. - Right of access - You have the right to ask us whether we process your Personal Data and to

- Right to rectification - You have the right to have any erroneous or incomplete information

- Right to data limitation - under certain circumstances, you have the right to request that we

- Right to be forgotten - You have the right to request that the Personal Data we hold on you be

erased from our system, and we will do so unless we have a legitimate cause, legal requirement,

or another statutory basis to refuse. Even if we are able to delete Personal Data that is subject to

our active processing activities and stop processing it, we will keep this Personal Data in our backup and archive storage to meet our statutory and other obligations. - Right to object - You have the right to object to the processing of your data by contacting us at any time for reasons arising from your unique situation, provided that the data processing is based on our or a third party's legitimate interest, or where profiling, machine learning, or automated decision-making algorithms are used. We shall no longer process your Personal

Data in this case. If we can show that there are compelling, valid reasons for the processing that

- Right to withdraw consent - You have the right to withdraw your permission to the processing

outweigh your interests, or if we need your data to assert, exercise, or defend legal rights, the

- Right to complain - your rights are important to us. However, if You believe we have not

effectively addressed your issues, You have the right to file a complaint with the relevant data

privacy protection authorities. You can file a complaint with the EEA regulatory authority in your

of your Personal Data for specified purposes that You provided us.

To exercise your rights or for any question on Personal Data protection, You shall make a request accompanied by proof of identity by mail addressed to Forbitspace Foundation LLC - 10 Anson Road, #13-09 International Plaza, Singapore 079903 or First Floor, First St. Vincent Bank Ltd Building, James Street, Kingstown, VC0100, Saint Vincent & the Grenadines. Otherwise, You can

send an email to the address contacts@forbitspace.com or hello@forbitspace.com we will

The company shall strive to reply without undue delay and at the latest within one (1) month

after the receipt of the request. The company reserves the right to extend this period to three (3)

The company is committed to protecting your Personal Data and complying with the applicable data protection legal framework. In addition, in the event You provide Company with information enabling to identify directly or indirectly any other natural persons (e.g. You sent a request to Company with the contact email

address available on the Service and share personal data concerning another natural person in

your email), You represent and warrant that, prior to sharing this information with Company,

such other natural persons have been provided with this Privacy Policy and, to the extent

You are informed that information may be transmitted to Your browser or Equipment by the Service ("Cookies"). When You browse the Service for the first time, a Cookie banner may be displayed requesting You to accept, refuse or configure Cookies.

Cookies Retention period Name Purpose This cookie is set by the Google Analytics service to distinguish 2 months \_ga users. More information on Google Analytics. The maximum storage period for Cookies is thirteen (13) months from the time they are placed on your browser or Equipment. At the end of this period, new consent will be required.

You are informed that the refusal of certain Cookies may affect the delivery of the Service provided and the navigation on the Website. The company informs You that Cookies may be configured in the help menu of your browser, at