

## PRIVACY POLICY

### TRILITECH KANVAS LIMITED

We are committed to protecting and respecting your privacy and personal data and will only collect and use personal data in ways that are described here and ways that are consistent with our obligations and your rights under applicable law relating to the protection of personal data.

This Privacy Policy aims to give you information about how we collect and process your personal data when you visit our website(s) – including subdomains of our website(s) and websites through which we make our products/services available (together, “**our site**”) – regardless of where you visit these from, including any data that you may provide through our site, when you purchase our products/services, or when you otherwise interact with us.

Please read this Privacy Policy carefully and ensure that you understand it. By using our site or products/services, you agree to be bound by this Privacy Policy and consent to the collection, use, processing, and disclosure of your personal data as described in this Privacy Policy.

It is important you read this Privacy Policy together with any other Privacy Policy we may provide from time to time when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

References to “**you**” or “**your**” are to you as an individual using our site or otherwise contacting us (whether on behalf of yourself, or another individual or organisation).

#### **1 INFORMATION ABOUT US**

- 1.1 Our site is owned and operated by TRILITECH KANVAS LIMITED, a business company incorporated with company number 2097653 under the laws of the British Virgin Islands with its registered address at Trinity Chambers, Ora et Labora Building, Wickhams Cay II (PO Box 4301), Road Town, Tortola, British Virgin (“**Trilitech**”, “**we**”, “**us**”, or “**our**”). We are the controller and are responsible for this site.
- 1.2 We are responsible for your personal data, except where we process your personal data because you use our services as a result of your relationship with a client who we supply our services to (for example, if you use our products/services as a result of your being our client’s employee or client).
- 1.3 Where we process your personal data because you use our products/services as a result of your relationship with a client who we supply our products/services to, we are not the data controller as we would be processing personal data on behalf of our client as a data processor.
- 1.4 Where we are processing your personal data on behalf of our client, the privacy policy that you should be referring to would be our client’s privacy policy. Our client’s privacy policy should inform you as to how your personal data will be processed.
- 1.5 We are bound by applicable data protection laws in respect of the handling and collection of your personal data.

## 2 WHAT PERSONAL DATA WE COLLECT ABOUT YOU

- 2.1 When you visit our site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse our site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to our site, and information about how you access and interact with our site. We refer to this automatically collected information as “**Device Information**”.
- 2.2 We collect Device Information using the following technologies:
- (a) *Cookies* are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, see our Cookies Policy.
  - (b) *Log files* track actions occurring on our site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
  - (c) *Web beacons, tags, and pixels* are electronic files used to record information about how you browse our site. Other than the above-described Device Information, we do not collect any additional information.

## 3 THIRD PARTY LINKS

- 3.1 Our site may include links to third party websites, plug-ins, and applications. Clicking on third-party links or enabling third-party connections may allow third parties to collect or share data about you. Third-party sites are not under our control, and we are not responsible for its content. When you leave our site, we encourage you to read the privacy policy of every website you visit.
- 3.2 Our site neither collects nor receives any of the information entered into third-party sites when making a purchase. Any purchases made on our site are made through your personal Tezos-compatible wallet.
- 3.3 We also use Google Analytics to help us understand how our customers use our site. You can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

## 4 IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, or pursuant to a service that we have been asked to supply to you, and you fail to provide that data when requested, we may not be able to perform the applicable contract or service. In this case, we may have to cancel any arrangement you have with us, but we will notify you if this is the case.

## **5 PURPOSES FOR PROCESSING PERSONAL DATA**

- 5.1 We will only use and process your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- (a) Where we need to provide services or information to you or to perform the contract we are about to enter or have entered with you.
  - (b) Where we have a legal or regulatory obligation we must comply with.
  - (c) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
  - (d) Where we have your express consent to process your data.
- 5.2 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. For instance, we may use your personal data to contact you in the future with press releases, news and updates about Tezos. In each case where we believe that this may be in your interest. “**Tezos**” means the open-source distributed ledger and blockchain software technologies known as the Tezos protocol and the peer-to-peer permissionless blockchain computer networks powered by the Tezos protocol. Tezos does not exist as a legal person, and no single entity owns, manages, or controls Tezos.
- 5.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **6 HOW WE MAY SHARE YOUR PERSONAL DATA**

- 6.1 We may share your personal data with certain parties such as professional advisors including lawyers, bankers, auditors, and insurers and HM Revenues & Customs, regulators, and other authorities.
- 6.2 We may further share your personal data with third parties we use to provide services to you as described in this Privacy Policy and our Terms and Conditions for use of our site. As described, we use Google Analytics to help us understand how our customers use our site. You can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.
- 6.3 We may also share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.
- 6.4 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use

your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6.5 **International transfers.** We may need to share your personal data outside the UK and/or EEA, for example, where our third parties are based in other countries. Whenever we transfer your personal data out of the UK and/or EEA, we ensure a similar degree of protection is afforded to it. by ensuring that at least one of the following safeguards is implemented:

- (a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- (b) If we transfer your personal data to any other country which is not subject to an adequacy decision of the UK or the European Commission (as applicable) regarding an adequate level of protection of personal data, we will ensure that there is a legal basis and, if required, a relevant safeguard method for such data transfer so that your personal data are treated in a manner that is consistent with, and respects the applicable laws and regulations on data protection in the UK or the EEA (as applicable).
- (c) Where we use certain service providers outside of the UK and/or the EEA (as applicable), we may use specific contracts approved for use in the UK and/or the EEA (as applicable) which give personal data the same protection it has in the UK and/or the EEA (as applicable).

## **7 DO NOT TRACK**

7.1 Please note that we do not alter our site's data collection and use practices when we see a Do Not Track signal from your browser.

## **8 WE DO NOT RETAIN YOUR PERSONAL DATA**

8.1 We do not retain or maintain any personal data at our site. If you have any further questions, please contact us at [metamask-snap@trili.tech](mailto:metamask-snap@trili.tech).

## **9 CHANGES TO THIS PRIVACY POLICY**

9.1 We keep this Privacy Policy under regular review and may update it from time to time. We reserve the right to make amendments to our Privacy Policy at any time. Historic versions can be obtained by contacting us.

9.2 Any changes we may make to this Privacy Policy will be posted on our website.

9.3 Unless otherwise provided in this Privacy Policy, it is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.