

# APOSTRO

## Privacy Notice

**Last Updated:** September 12, 2022

The Apostro website available at <https://www.apostro.xyz>, including any of its subdomains (the “Website”) is provided by **Apostro Labs Inc.** (“we”, “our”, “us” or “Apostro”). With respect to personal data collected on the Website, we act as a data controller, meaning that we determine the purposes and means of processing your personal data.

In this Privacy Notice we explain how we collect and process your personal data. Personal data or personal information means any information directly or indirectly identifies you as an individual. In this Privacy Notice we use “personal data” and “personal information” as synonyms.

We process personal data in accordance with this Privacy Notice and we endeavour to comply with the applicable data protection legislation. If you have any questions regarding processing of your personal data, do not hesitate to contact us via the contact details provided below.

### Contact details

**Name:** Apostro Labs Inc., a British Virgin Islands business company

**Address:** Intershore Chambers, PO Box 4342,  
Road Town, Tortola, VG1110 British  
Virgin Islands

**Email:** [legal@apostro.xyz](mailto:legal@apostro.xyz)

## I. What information we collect

The categories of personal data we collect depend on how you interact with us, the Website, and the requirements of applicable data protection legislation:

### A. Analytical Data

When you access and use the Website, certain data may be collected automatically via the Google Analytics and Fathom Analytics solution.

#### Google Analytics

The information gathered by Google Analytics includes the following: (1) IP address, (2) the type of device used, (3) the device operating system, and (4) the browser used, if any. After collecting the personal data, Google Analytics creates reports about the use of the Website, which contain the aggregated information where we do not see any data pertaining to a particular person. In other words, we cannot identify you from the other visitors of the Website. Please note that according to [Google Analytics documentation](#), the IP address is anonymised (masked), so neither we nor Google can identify the IP address of a particular visitor.

In addition to the above, with Google Analytics we collect certain information regarding the use of the Website, for instance, when you clicked a certain button or made some input. This information is also aggregated and we cannot identify your actions from the actions of other Website visitors.

## **Fathom Analytics**

The information gathered by Fathom Analytics includes the following: (1) IP address, (2) the type of device used and its operating system, (3) the browser used, and (4) information about the amount of time spent on the Website and about total requests per the IP address. After collecting the personal data, Fathom Analytics creates reports about the use of the Website, which contain the aggregated information where we do not see any personal data pertaining to a particular person. In other words, we cannot identify you from the other visitors of the Website.

Please note that according to [Fathom Analytics documentation](#) and [Fathom Data journey](#), the IP address is anonymised (masked), and Fathom uses certain unique user hashes (i.e., random set of symbols) assigned to each visitor of the Website in order to identify a visitor in an anonymous manner without identifying you as a particular individual from the other visitors of the Website.

In addition to the above, with Fathom Analytics we collect certain information regarding the use of the Website, for instance, when you view a certain Website page or make any request, etc. This information is also aggregated and collected in an anonymous manner by assigning the relevant user hash. It means that we cannot identify your actions from the actions of other Website visitors.

## **B. Subscribe Data**

You may also be able to subscribe to the Apostro news functionality, available on the Website (the “**Apostro’s Newsletter**”) and create an account therewith, for which purpose you will need to provide your email address, password, and any other data that you choose to provide us with.

In order to process your email address, we use [Substack](#) solution, which is operated by Substack Inc., 111 Sutter Street, 7th Floor, San Francisco, CA, 94104, USA. Substack is a joint controller of the email address you provide to subscribe to the Apostro’s Newsletter. You may exercise your data protection rights against both of us. Substack processes your personal data in accordance with their [Privacy Policy](#).

You may unsubscribe from receiving marketing emails from us at any time by contacting us, by turning off notifications in your account settings, or clicking the unsubscribe button available at the bottom of each marketing email. In such a case, we will delete your email address from the respective marketing database.

Please note that administrative or service-related communications (security alerts, email verifications, maintenance notifications, etc.) are not considered marketing and such communications may not offer an option to unsubscribe.

## **C. Contact Data**

We may also collect certain data if you reach us (i) via the contact details indicated in this Privacy Notice or on the Website, or (ii) via the functionality available on the Website for scheduling a call with the Apostro team. In this case, we may collect and process certain information related to your request, such as email address, name, or any other data requested by us or data that you choose to provide us with.

In order to enable you to invite others to the respective scheduled call, we also collect the email addresses of such persons.

# **II. How we use and share the information**

## **A. General**

We do not sell or rent out your personal data. However, we may pass your information to our third-party service providers and subcontractors for the purposes of and if it is necessary to provide you with the access to the Website and its functionality. These service providers may include, for instance:

- (a) our affiliates, meaning any person controlling, controlled by, or under the same control as Apostro;
- (b) analytical solution providers, e.g. [Google](#) and [Fathom](#);
- (c) marketing teams;
- (d) support teams;
- (e) technical teams;
- (f) hosting service providers; and
- (g) other third-party solutions as may be from time to time integrated into the Website, such as (i) [Calendly](#) — when you fill the form in order to schedule a call with the Apostro team, and/or (ii) [Substack](#) — when you subscribe to the Apostro's Newsletter. Please note that Substack, as well as any other similar service provider, is a separate data controller with respect to certain data collected by it, e.g. cookies data, or data that you choose to provide Substack with, e.g. any payment data where you make a purchase from it, and we do not process such data.

We may also disclose your personal data if we are under a duty to disclose or share such data in order to comply with a legal obligation. However, we will endeavour to take reasonable steps to ensure that your rights continue to be protected. In addition, your personal data will be transferred to the government authorities, upon their request or if necessary to comply with a legal obligation, or another entity if we sell or otherwise transfer the Website or its part.

## **B. Analytical Data:**

The Analytical Data helps us to provide a better user experience by improving the Website user flow and interface. To use Google Analytics and Fathom Analytics, we rely on your consent and our legitimate interests.

### **Google Analytics**

We use Google Analytics to analyse the use of the Website. Google Analytics gathers information about the use of the Website by means of cookies. Cookies are a feature of the software that allows web servers to recognise the device used to access the Website. A cookie is a small text file that the Website saves on your device when you visit thereof. They allow the Website to remember your actions and preferences over a period of time to improve our products and services.

Google Analytics is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, and its affiliates including Google LLC, 1600, Amphitheatre Parkway, Mountain View, CA, 94043, USA ("**Google**").

To our knowledge, the data collected via Google Analytics is not anonymised (with the exception of the IP address) and will be transmitted to, processed and stored by Google in the United States. You can learn more about how Google processes personal data in [Google's privacy policy](#). Note that competent US state authorities may have access to the personal data collected via Google Analytics.

With respect to the personal data collected via Google Analytics, Google acts as our data processor. However, Google may use this personal data for any of its own purposes, such as profiling and cross-platform tracking. In this case, Google acts as an independent data controller. You can learn more about Google Analytics, its purposes and functions [here](#).

To use Google Analytics, we will ask for your consent. When you visit the Website, you are able to opt out from using Google Analytics. You also may object to the collection of personal data by Google Analytics by downloading and installing a [browser add-on from Google](#).

### **Fathom Analytics**

We use Fathom Analytics to analyse the use of the Website and provide a better user experience.

Fathom Analytics gathers information about the use of the Website by loading a cookie-free script, which is essentially a javascript file. Please note that according to [Fathom Analytics documentation](#) and [Fathom Data journey](#), Fathom does not use any cookies or other similar tracking pixels and technologies.

In order to gather information anonymously as far as possible, Fathom assigns to each visitor of the Website a unique user signature hash and page request signature hash. They allow the Website to recognise you as a new or return visitor of the Website and remember your pageviews and preferences over a certain period of time to improve our products and services. More information about hashes assigned and used by Fathom Analytics can be found [here](#).

Fathom Analytics is operated by Conva Ventures Inc., registered at BOX 37058 Millstream PO, Victoria, British Columbia, V9B 0E8 ("**Fathom**").

To our knowledge, the data collected via Fathom Analytics is, generally, anonymised, however, may be transmitted to, processed and stored by Fathom in the United States or other countries that may not offer the same level of data protection as the laws of the jurisdiction you reside. This notwithstanding, according to [Fathom's EU Isolation](#), the data of visitors located and/or residing in the European Union or European Economic Area are stored on the servers located in the EU/EEA, and may not be transmitted to, processed, and stored by Fathom in the United States. You can learn more about how Fathom processes, collects, uses and shares personal data in [Fathom's privacy policy](#).

With respect to the personal data collected via Fathom Analytics, Fathom acts as our data processor. However, Fathom may use certain personal data for any of its own purposes, as described in [Fathom's privacy policy](#). In this case, Fathom acts as an independent data controller. You can learn more about Fathom Analytics, its purposes and functions [here](#).

### **C. Subscribe Data**

We collect the Subscribe Data in order to provide you with our marketing emails concerning the Aposto project, related products and services, and Web3 security industry, as well as to enable you (i) to create an account with the Apostro's Newsletter, and (ii) to access any information and materials contained therein, including browsing through articles, reviewing Apostro updates, etc. The legal basis for the processing is your consent.

### **D. Contact Data:**

The purpose for processing your personal data when you contact us is (i) to respond to your inquiry, (ii) to enable you to schedule and visit a call with the Apostro team regarding the showcase of the Apostro platform and its certain functionality and benefits upon your request, and/or (iii) to enable you to invite others to the respective scheduled call. The legal basis for the processing is our legitimate interest to do the same.

### III. How long we process your data

#### A. General

As a general rule, we keep the data as long as it is necessary for the purposes it was collected. If necessary under the applicable law or to protect our rights and interest or those of third parties, we may process the data longer than outlined below.

#### B. Analytical Data

We process the Analytical Data collected by Google for up to two (2) years. Particular cookie expiration periods set out by Google Analytics can be found [here](#). Please note that as long as the Analytical Data collected by Fathom is anonymous, aggregated and does not allow us to identify any particular person, we do not establish any storage period. If and to the extent we become able to identify any particular person, we will promptly update this Privacy Notice and establish a certain limitation period for the processing of such Analytical Data.

#### C. Subscribe Data

We process your Subscribe Data as long as you keep your account with and remain a subscriber of the Apostro's Newsletter, i.e. until you opt out from receiving our marketing emails.

#### D. Contact Data

We store the contact data for one (1) year from the last date when you contacted us regarding the same matter. We set this retention period during the statutes of limitations established in our [Legal Notice](#). In case of pending legal actions, we may process the Contact Data longer.

### IV. Third-party links

The Website may include links and social media plugins to the third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and applications, and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy policy/notice/statement of every website or application you visit.

### V. Your rights

According to the applicable data protection legislation, you may have the following rights:

- request **access** to your personal data (commonly known as a “data subject access request”). This enables you to ask us whether we process your personal data and, if we do process your data, you may request certain information about the processing activity and/or a copy of the personal data we hold about you and to check that we are lawfully processing it;
- request **correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- request **erasure** of your personal data (commonly known as the “right to be forgotten”). This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase

your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal or technical reasons which will be notified to you, if applicable, at the time of your request;

- **object** to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- request **restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (1) if you want us to establish the data's accuracy, (2) where our use of the data is unlawful but you do not want us to erase it, (3) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, (4) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- request the **transfer** of your personal data to you or to a third party (commonly known as the "right to the data portability"). We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- **withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent;
- not to be subject to a **decision based solely on automated processing of data**, including profiling, which produces legal effects concerning you or similarly significantly affecting you; and
- **file a complaint** with a relevant supervisory authority in case we violate your rights or obligations imposed on us under the applicable data protection legislation. The relevant supervisory authority may depend on where you are located.

In order to exercise your rights as a data subject, we may request certain information from you to verify your identity and confirm that you have the right to exercise such rights.

## VI. Children personal data

The Website is not intended for the use of children (under 18 years old or older, if the country of your residence determines a higher age restriction). We do not knowingly market to, or solicit data from children. We do not knowingly process, collect, or use personal data of children.

If we become aware that a child has provided us with personal information, we will use commercially reasonable efforts to delete such information from our database. If you are the parent or legal guardian of a child and believe that we have collected personal information from your child, please contact us.

## VII. Changes to this Privacy Notice

We keep our Privacy Notice under regular review and may update it at any time. If we make any changes to this document, we will change the "Last Updated" date above. Please review this Privacy

Notice regularly. If we make substantial changes to the way we treat your personal information, we will display a notice on the Website prior to the change becoming effective.