

# DAOStack (Designated GUI)

## Privacy Notice

*Last Updated: December 4, 2019*

This Privacy Notice (the “**Privacy Notice**”) sets out what Personal Data we collect within the scope of our proprietary Alchemy User Interface (“**Alchemy**”).

***While Alchemy is accessible via the <https://alchemy.daostack.io/> domain (the “Domain”), this Privacy Notice solely relates to your use of the Alchemy, such that your use and browsing of the Domain might be governed (if applicable) by different privacy policies and procedures.***

In this Privacy Notice, “we”, “us” and “our” refers to DAOstack Limited, a company incorporated in Gibraltar. For more information about us, see the “Contact Us” section of this Privacy Notice.

In this Policy, “personal data” or “personal information” means any information relating to you as 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 online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

For the avoidance of doubt, it does not include data from which you cannot be identified (which is referred to simply as data, non-personal data, anonymous data, or de-identified data).

In this Policy, “processing” (or any variation thereto) means any operation or set of operations which is performed on personal data (as defined in this Notice) or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## Introduction

This Privacy Notice describes the means we implement and use when you browse the designated web page of Alchemy, and its use.

In this Privacy Notice, when we use the term “**Personal Information**” or “**Personal Data**”, we refer to any data, which may enable the identification of a specific person, or is otherwise linked to such potentially identifying data.

The purpose of Alchemy is not to enable the subscription for, or trade of, any tokens or cryptocurrency, but rather serve as a UI facilitator interactions with the DAO based “smart contracts”.

## How we collect information from you

We may use certain cookies, pixels, clear codes, or the likes, for the purpose of information collection. We also implement “Local Storage” means, as further described in this document.

## Automatically Collected Information

- Data Automatically Collected or Generated

When you visit, interact with or use Alchemy, we may collect or generate technical data about you. We collect or generate such data either independently or with the help of third party services, including through the use of “local storage” (as further detailed below), or through means such as cookies and the like.

We do not use such data to learn a user’s true identity or contact details, but mostly to have a better understanding of how our users typically use Alchemy.

- Data Received From You

You may provide us Personal Data voluntarily, such as your name, e-mail address, phone number, and location when you contact us, interact with Alchemy, when linking your cryptographic wallet to Alchemy, or when integrating your social media account to your profile in Alchemy. Furthermore, when setting up your profile with Alchemy, you will be able to add certain text associated to such profile, which we may also collect.

## Your information and the Blockchain

Blockchain technology, also known as distributed ledger technology (or simply ‘DLT’), is at the core of our business, and the main utilization purpose of Alchemy, which allows access to DLT. Blockchains are decentralized and made up of digitally recorded data in a chain of packages called ‘blocks’. The manner in which these blocks are linked is chronological, meaning that the data is very difficult to alter once recorded. Since the ledger may be distributed all over the world (across several ‘nodes’ which usually replicate the ledger) this means there is no single person making decisions or otherwise administering the system (such as an operator of a cloud computing system), and that there is no centralized place where it is located either.

Accordingly, by design, a blockchain’s records cannot be changed or deleted and are said to be ‘immutable’. This may affect your ability to exercise your rights such as your right to erasure (this being your right to be forgotten), the right to rectification of your data or your rights to object or restrict processing, of your personal data. Data on the blockchain cannot generally be erased or changed, although some smart contracts may be able to revoke certain access rights, and some content may be made invisible to others, however it is not deleted.

**IF YOU WANT TO ENSURE YOUR PRIVACY RIGHTS ARE NOT AFFECTED IN ANY WAY, YOU SHOULD NOT TRANSACT ON BLOCKCHAINS AS CERTAIN RIGHTS MAY NOT BE FULLY AVAILABLE OR EXERCISABLE BY YOU OR US.**

**IN PARTICULAR THE BLOCKCHAIN IS AVAILABLE TO THE PUBLIC AND ANY PERSONAL DATA SHARED ON THE BLOCKCHAIN WILL BECOME PUBLICLY AVAILABLE.**

## What type of information is collected?

The personal data we collect may include:

- IP address;
- previous visits to Alchemy;

- Technical information when and if a crash occurs;
- User Name, profile and description;
- Social identity link (3<sup>rd</sup> party login account), used to authorize Alchemy to connect and display the personal account and mapping between your cryptographic wallet address, name, personal description and said social account verifications.

## **How we use your information**

We use personal information about you in connection with the following purposes:

We use your personal information to enable the third party login services prescribed below, and to help us to develop and enhance the operational aspects offered via Alchemy.

We also use the information you provide for your profile with Alchemy to enable you to present this information within the context of your profile to other users of Alchemy.

We may use your cryptocurrency wallet to enable you to use the “scheme registrar” and “contribution reward” functionalities of Alchemy, and for personal customization of certain features available to you when you use Alchemy.

## **Local Storage**

### What is Local Storage?

Local Storage is a mean for storing information, which is a sub category of the “Web Storage” (otherwise known as DOM Storage) means. Unlike Cookies, the Local Storage mean does not enable the storage of information under the HTTP Request Header.

### How is the Local Storage Accessed?

We implement and use our Local Storage means in such a manner which require a three tier combination. This means that we can only communicate with the data stored under the specific Local Storage data in your machine if you (i) are accessing Alchemy (ii) are using the same machine to access Alchemy, and (iii) are using the same browser initially used to access Alchemy.

## **Third Party Vendors / Applications**

### **Heroku / Salesforce**

We use the third party hosting services of Heroku for the hosting and storage of Alchemy, including its operation (link: <https://www.heroku.com/>), which is based or otherwise interfaces with Salesforce platforms.

Please note that Heroku may use and/or collect your Personal Data. Thus, we recommend to view Heroku’s Privacy Policy at the following link:

<https://www.salesforce.com/company/privacy/> and/or  
[https://www.salesforce.com/company/privacy/full\\_privacy/](https://www.salesforce.com/company/privacy/full_privacy/)

### **Sentry**

We engage Sentry to provide us with services regarding the generation of error report pertaining to system crash. The report / log may contain your IP address cryptographic wallet address; and relevant information regarding the crash. Please refer to their privacy policies for more information:

<https://sentry.io/security>

### **Amazon Web Service**

We use Amazon Web Service (AWS) to host our indexing service and cache storage. AWS may collect Personal Data from you when you use Alchemy..

For more information and to view AWS' privacy practices please visit:

<https://aws.amazon.com/compliance/gdpr-center>

### **DISQUS**

We have implemented the DISQUS feature in Alchemy in order to enhance our user's experience when posting comments through Alchemy. DISQUS has implemented its own regime in terms of data collection. Please refer to Discus privacy policy for more information:

<https://help.disqus.com/en/articles/1717103-disqus-privacy-policy>

### **Google Analytics**

We use Google Analytics in order to receive analysed information about how our users use Alchemy. Google Analytics may implement cookies or other means to achieve this. For additional information please review our Cookies Policy [<https://alchemy.daostack.io/cookie-policy>].

### **Mixpanel**

We use Mixpanel in order to receive analysed information about how our users use Alchemy. Mixpanel platform may implement cookies or other means to achieve this. For additional information please review our Cookies Policy [<https://alchemy.daostack.io/cookie-policy>].

### **Third Party Login**

We allow you to use your profile with certain login service providers (such as Github, Twitter), social media and/or other services to serve as your profile on Alchemy. Those services might also collect personal data. Please refer to their privacy policies for more information:

<https://help.github.com/en/articles/github-privacy-statement> and/or

<https://help.twitter.com/en/rules-and-policies/twitter-api>

Please refer to the privacy policies on the above links, noting that they may be changed without notice by the relevant social media service providers. We are not responsible for the privacy policies and practices of other organisations and you should check with the relevant organisation as to how they manage personal data and any updates they may make to their policies.

## How long we keep your information for

Local Storage means are similar to “persistent cookies”, and thus the data stored via such means do not expire at the lapse of each session, but rather when you “clean history” of your browser.

Personal Data uploaded by you with respect to your profile with Alchemy shall remain so long as you have not removed it and/or asked us to remove it per your GDPR rights, as we deem it to constitute an integral part of your social profile with Alchemy.

Personal Data may be collected within the scope of crash report generated by Sentry (as described above). While we do not store any personal Data generated by such report, we urge you to refer to Sentry’s privacy notice to better understand its personal data related practices, including the periods through which your Personal Data will be stored by Sentry.

Personal Data may also be collected by our third party vendors as described above. We urge you to refer to each respective vendor’s privacy notice to better understand its personal data related practices, including the periods through which your Personal Data will be stored by such third party vendor.

## Sharing your personal information

We do not share your Personal Information. However, you should refer to the specific privacy pages of our third party vendors prescribed above to better understand what type of Personal Information is collected about you when using the GUI or otherwise browsing the Designated Page.

## Transferring your information outside of the European Economic Area

Other than as expressly specified in this Privacy Notice or our cookies policy, we do not share your Personal Information with third party companies.

**However, when interacting with the blockchain, as explained above in this Privacy Notice, the blockchain is a global decentralized public network and accordingly any personal data written onto the blockchain may be transferred and stored across the globe.**

## Your individual rights

### Your Rights Regarding Your Personal Information

We care about your privacy rights. Please note that you may have certain rights regarding the manner of collection, processing and usage of your personal information pursuant to applicable privacy laws such as the EU General Data Protection Regulations (“**GDPR**”). Under the GDPR (to the extent it applies to you) you may be eligible for the following rights:

#### **The right to have your personal information deleted.**

This right is subject to any requirement we may be subject to in connection with our compliance with a legal obligation / our exercise of a legal defence.

#### **The right to access the personal information collected and processed.**

In order for us to accommodate such right, please contact us in accordance with the details found at the “Contact us” section below.

**The right to rectify untrue or incorrect personal information.**

In order for us to accommodate such right, please contact us in accordance with the details found at the “Contact us” section below.

**The right to object to us processing your personal information.**

You may be entitled to object to certain processing functions, made for example, in connection with profiling activities. In order for us to accommodate such right (to the extent applicable), please contact us in accordance with the details found at the “Contact us” section below.

**The right to have your personal information exported at your request.**

We will make efforts to comply with within a reasonable time, and provide you with such compiled data in an electronic medium of our choice.

Please note that the above list contains a summary of the main rights you may have under the GDPR. Under no circumstances shall the above be deemed as an exhaustive list, nor should you rely on it in terms of fully understanding all of your rights under the GDPR.

**Exclusions and Limitations.**

Please refer to our warning under the ‘Your information and the Blockchain’ section of this Privacy Notice, which provides details on how this right may be affected.

Specifically, when interacting with the blockchain we may not be able to ensure that your personal data is deleted. In these circumstances we will only be able to ensure that all personal data that is held by us is permanently deleted.

Furthermore, in light of the limited personal information scope we collect about you (namely, your IP address), you will be required to provide us with sufficient identification in order for us to comply with any request you may have to exercise any of your rights under the GDPR.

**Right to lodge a complaint with a relevant supervisory authority**

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Data Protection Commissioner under the Data Protection Act 2004, which is presently the Gibraltar Regulatory Authority (GRA). You may contact the GRA on the below details:

Gibraltar Data Protection Commissioner  
Gibraltar Regulatory Authority  
2nd Floor, Eurotowers 4  
1 Europort Road  
Gibraltar  
**Email:** [info@gra.gi](mailto:info@gra.gi)  
**Phone:** (+350) 200 74636  
**Fax:** (+350) 200 72166

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work, or the place where you allege an infringement of one or more of our rights has taken place, if that is based in the EEA.

## Data Security

We have put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Third Party Links

WE MAY PROVIDE HYPERLINKS FROM ALCHEMY TO WEB SITES OF OTHER ORGANISATIONS OR ASSOCIATED COMPANIES, INCLUDING WITHOUT LIMITATIONS, TO THIRD PARTY LIQUIDITY PROVIDES THAT MAY ENABLE YOU TO PURCHASE OTHER TOKENS (SUCH AS ETH) AND/OR CONVERT YOUR GEN / ETH TO OTHER TOKENS (AND VICE VERSA). PLEASE NOTE THAT WE WILL NOT BE LIABLE FOR THE CONTENTS OF LINKED WEB SITES OR ANY TRANSACTIONS CARRIED OUT WITH ORGANISATIONS OPERATING THOSE WEB SITES. THE PRIVACY POLICIES OF OTHERS MAY DIFFER SIGNIFICANTLY FROM THIS NOTICE. THEREFORE, WE ENCOURAGE YOU TO READ THE PRIVACY STATEMENT/POLICY OF EACH AND EVERY WEBSITE THAT COLLECTS PERSONAL DATA.

## Review of this Privacy Notice

We may make changes to this Privacy Notice from time to time. Where we do so, we will notify those who have a business relationship with us or who are subscribed to our emailing lists directly of the changes, and change the '*Last Updated*' date above. We encourage you to review this Privacy Notice whenever you access or use our Designated Page to stay informed about our information practices and the choices available to you. If you do not agree to the revised Privacy Notice, you should discontinue your use of this Designated Page.

## Contact Us

Any questions regarding our Privacy Notice or your rights as a Data Subject should be sent to:

Privacy Manager  
DAOstack Limited  
23 Portland House  
Glacis Road  
Gibraltar  
GX11 1AA

Questions can also be sent by email to: [privacy@daostack.io](mailto:privacy@daostack.io)

The Designated Page is owned and operated by DAOstack Limited; a company incorporated in Gibraltar with its registered address at 23 Portland House, Glacis Road, Gibraltar, GX11 1AA and incorporation number 116055.

This Designated Page is managed from Israel, which is a country outside of the EEA which has been deemed by the European Commission to offer an adequate level of data protection for the purposes of article 45 of the GDPR.