

GDPR Compliance Policy for the Dronera project

Dronera GDPR Compliance Policy

Effective Date: 25.06.2025

Controller: Dronera S.R.L.

Jurisdiction: EU / EEA / GDPR-compliant jurisdictions

1. Overview

Dronera S.R.L. is committed to ensuring full compliance with the General Data Protection Regulation (GDPR - EU 2016/679) in all its operations, including investor onboarding, token transactions, research collaborations, and online activities.

2. Personal Data Collected

We may collect and process the following categories of personal data:

- Investor and KYC Data: Full name, ID documents, email, address, nationality, proof of funds
- User Activity Data: Wallet address (pseudonymous), IP address, cookies, session logs
- Partner and Supplier Data: Names, emails, positions, contractual information
- Employee/Applicant Data: CVs, IDs, work history, references

3. Purpose of Data Processing

Your personal data is processed for the following purposes:

- To onboard investors and issue DRN tokens
- To meet legal obligations (KYC/AML, tax, financial regulation)
- To fulfill smart contract obligations (profit distribution, vesting)
- To manage research partnerships and vendor contracts
- To optimize platform security and functionality

4. Legal Basis for Processing

We rely on one or more of the following lawful bases:

- Consent (e.g., for marketing communications)
- Contract (e.g., token purchase agreements)
- Legal obligation (e.g., compliance with AML/finance laws)
- Legitimate interest (e.g., platform security, analytics)

5. Data Sharing and International Transfers

Data may be shared with:

- Trusted third-party KYC providers
- Legal, financial, or compliance advisors
- Government authorities (where required)

International transfers are protected by **EU Standard Contractual Clauses** or occur only to jurisdictions with **adequate protection levels** as defined by the European Commission.

6. Data Retention Periods

<u>Data Type</u>	<u>Retention Period</u>
KYC/AML Records	5 years
Transaction Logs	7 years
Marketing Consent Data	Until consent revoked
Employee/Applicant Records	Up to 3 years post-exit



7. Data Subject Rights

You have the right to:

- Access your data
- Correct or update your data
- Request deletion (under certain conditions)
- Restrict or object to processing
- Withdraw consent at any time
- Request data portability
- File a complaint with the Romanian DPA (**ANSPDCP**)

Requests may be submitted via:

privacy@dronera.eu

8. Security Measures

Dronera implements the following data protection safeguards:

- Encryption of sensitive files (at rest and in transit)
- Role-based access control for staff
- Secure smart contract systems with QRNG entropy
- Cold-storage of investor KYC data
- Data minimization across all systems

9. Automated Processing

Some aspects of our smart contract-based token platform may involve automated operations (e.g., vesting, profit split), but no decisions with legal or financial significance are made without human review.

10. Contact Information

Dronera S.R.L. – Data Protection Officer

Address: [Vaslui, str. Ștefan cel Mare, nr. 320 a Corp C1, jud. Vaslui, Romania]

Email: gdpr@dronera.eu