

# Privacy Notice – RAT.FUN (\$RAT) Mini-Offer

(Version 1.0 – December 2025)

## Controller

Moving Castles GmbH  
Leuschnerdamm 13  
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Germany  
Email: [legal@movingcastles.world](mailto:legal@movingcastles.world)

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## 1. Purpose of Processing

MC processes limited technical information in connection with the \$RAT sale to:

- determine the Buyer's **country** as evidence for correct **VAT** treatment; and
  - check **jurisdictional eligibility** and comply with regulatory and tax requirements.
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## 2. Data Processed

MC applies strict data minimisation:

- The Buyer's **IP address** is evaluated **ephemerally** at checkout.
- Only the derived **country code** (e.g. "DE", "FR", "US") is retained for VAT and eligibility purposes.
- Full IP addresses are **not stored**. No cookies, names, contact details or other directly identifying data are stored for this purpose.

Wallet addresses and transactions are public on the relevant blockchain as part of normal network operation. MC does not actively link wallet addresses to identified individuals beyond the use described in this Privacy Notice.

The sale contract may record the country code together with the Buyer's wallet address in on-chain events (such as **Receipt** events). These records are publicly visible on-chain and cannot be deleted by MC.

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## 3. Legal Basis

Processing is based on:

- **Art. 6(1)(c) GDPR** – compliance with legal obligations, in particular record-keeping and VAT evidence obligations under EU and German tax law (including the German Fiscal Code, *Abgabenordnung*); and
  - where necessary to operate eligibility checks and prevent misuse of the offer, **Art. 6(1)(f) GDPR** – MC's legitimate interest in complying with regulatory limits, restricting access from excluded jurisdictions and ensuring the proper functioning of the token sale.
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## 4. Storage and Retention

MC stores only the **country code** derived from the IP evaluation, together with the necessary transaction references, for as long as required by applicable tax law, typically up to **ten years** (e.g. under § 147 AO).

Full IP addresses are discarded immediately after processing and are **not stored** by MC for this purpose.

On-chain records (such as transactions and events) are stored on the blockchain indefinitely and cannot be altered or deleted by MC.

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## 5. Recipients and International Transfers

Personal data is handled primarily by MC. Data may be shared with:

- **tax advisers**, and
- **tax authorities** or other competent public bodies, where required by law.

MC may use external service providers (e.g. hosting, infrastructure, logging or analytics providers) acting as **processors** under Art. 28 GDPR. Where such providers are located outside the EU/EEA or belong to groups headquartered in third countries, MC ensures that appropriate **safeguards** under Chapter V GDPR are in place (such as adequacy decisions or standard contractual clauses).

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## 6. Rights of Data Subjects

Data subjects have the following rights under GDPR, where the conditions are met:

- **Access** (Art. 15 GDPR)

- **Rectification** (Art. 16 GDPR)
- **Erasure** (Art. 17 GDPR)
- **Restriction of processing** (Art. 18 GDPR)
- **Data portability** (Art. 20 GDPR), where applicable
- **Objection** (Art. 21 GDPR), where processing is based on legitimate interests

Where processing is based on **Art. 6(1)(c) GDPR** (legal obligation), certain rights (in particular erasure, restriction or objection) may be limited to the extent processing is required for MC to fulfil statutory record-keeping and tax obligations.

Data subjects also have the **right to lodge a complaint** with a supervisory authority, in particular:

- the Berlin Commissioner for Data Protection and Freedom of Information, or
  - any other competent data protection authority in the EU/EEA.
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## 7. Contact for Data Protection Enquiries

For questions or to exercise GDPR rights, data subjects can contact:

Email: [legal@movingcastles.world](mailto:legal@movingcastles.world)