

Wavelength Privacy Notice

Last Updated: October 24, 2022

Wavelength website available at <https://www.wavelength.exchange>, including any of its subdomains, and Wavelength Application (App) (collectively, the “**Platform**”), are provided by Wavelength Labs Inc. (“**we**”, “**us**”, “**our**”). With respect to personal data collected when you access and use the Platform, we may act as a data controller, meaning that we determine the purposes and means of processing your personal data, or joint controller, depending on applicable circumstances as described in this Privacy Notice.

In this Privacy Notice, we explain which types of personal data we hold on you, how we collect and process such data, how long we keep it, and other relevant information about your personal data being processed in connection with your access to and use of the Platform.

This Privacy Notice also governs the processing of personal data on the social media channels (such as groups, chats, channels, etc.) administered by us (the “**Social Media Channels**”). The list of the Social Media Channels is provided on the Platform.

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: Wavelength Labs Inc., a BVI business company
Address: Intershore Chambers, PO Box 4342,
Road Town, Tortola, VG1110 British Virgin Islands
Email: [\[email address\]](#)

What information we collect

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

A. Wallet Data

In order to enable you to use certain functionality of the Platform, including to carry out certain transactions (the “**Transactions**”), we collect your public address (the “**Address**”) associated with the cryptographic wallet that you connect to the Platform (the “**Wallet**”). The Address constitutes a random set of symbols assigned by the respective blockchain network. We collect and process your Address when you connect your Wallet to the Platform. When you carry out Transactions with your Wallet, we collect and process information about such Transactions.

The references to “Address” and “Transaction” in this Privacy Notice apply to the Addresses and Transactions on all applicable blockchain networks and references to “Wallet” apply to any cryptographic wallet, which is essentially a pair of public and private cryptographic keys that can be used to receive, manage and dispose of cryptographic tokens regardless of such wallet’s underlying blockchain.

While processing the Address and Transactions, we cannot identify you as an individual (because it is impossible to identify you having only a random set of symbols). Therefore, this data is not personal. However, under the applicable data protection legislation, if such data is combined with certain other data (such as a name, email address, nickname, photo, phone number, or social media account data), it may become possible to identify you as an individual and thus, such a set of data may be deemed personal information.

B. Cookies

When you visit and browse the Platform, certain data may be collected automatically via cookies. The details are outlined below in the dedicated Cookies section of this Privacy Notice.

C. Social Media Data

When you access or otherwise participate in our Social Media Channels in social media (“**Social Media**”), for example, on Twitter, Discord, Telegram, or Medium, you may provide certain personal data to us and/or the respective Social Media. Such personal data may include nicknames, names, photos, messages, comments, communications, and other data that you choose to provide us with.

According to the applicable data protection legislation, we may be considered a data controller or joint controller of such data. If and to the extent we are considered to be joint controller according to the applicable data protection legislation, you may exercise your data protection rights with respect to the Social Media Data against both us or the respective Social Media, however, we will be able to assist you only with respect to the processing operations expressly outlined in this Privacy Notice.

D. Contact Data

We may also collect certain data if you reach us via the contact details indicated in this Privacy Notice or on the Platform. In this case, we may collect and process certain information related to your request, such as email address, nickname, name, or any other data you choose to provide us with.

How we use and share the information

General:

We do not sell or rent out your 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 and maintain the Platform. These service providers may include, for instance, support teams, technical teams, analytic providers, and hosting service providers. We may also disclose your data if we are under a duty to disclose or share your data in order to comply with a legal obligation. However, we will take reasonable steps to ensure that your rights continue to be protected. In addition, your data will be transferred to another entity if we sell or otherwise transfer the Platform or its part.

Wallet Data:

We use the Wallet Data to enable you to use certain functionality of the Platform, for instance, to carry out and complete the Transactions. If and to the extent that the Address and information about your

Transactions are deemed personal data, the legal basis for the processing is the necessity for the performance of a contract between you and us.

Please also consider the features of public blockchains data processing described below in section “Your information and blockchain”.

Cookies:

We describe how we use and share the cookies below in the dedicated Cookies section of this Privacy Notice.

Social Media Data:

General:

We process the data collected within the Social Media Channels for the following purposes:

- a. communicate with the visitors, participants, or subscribers;
- b. handle requests from visitors via the Social Media Channels;
- c. obtain statistical information about the reach of the Social Media Channels;
- d. conducting customer surveys, marketing campaigns, market analyses, competitions or similar promotions or events;
- e. resolve disputes and lawsuits, exercise or defend legal claims or lawsuits.

As a general rule, the legal basis for the processing is our legitimate interest to achieve the above purposes. If and to the extent you wish to enter into a contractual relationship with us, the legal basis for such processing is the necessity to take steps at your request prior to entering into a contractual relationship and further to perform a contractual relationship between you and us.

If we intend to process your personal data for a purpose other than that stated above, we will inform you of this prior to such processing.

Certain processing details vary depending on the Social Media, therefore, please refer to the respective Social Media listed below.

Twitter:

If you visit our Twitter accounts, please note that the operator of Twitter is Twitter, Inc. or Twitter International Unlimited Company depending on where you are located (hereinafter collectively “**Twitter**”). Twitter collects and processes personal data to the extent described in its privacy policy, which can be found [here](#).

We use the statistical information (the visits to our Twitter accounts, the range of contributions, information about the countries and cities where the visitors come from and statistics about the gender ratios of the visitors) related to the use of our Twitter accounts that Twitter makes available via the “Analytics” service in anonymized form. Conclusions about individual users and access to individual user profiles by us based solely on such information are impossible.

With respect to the above processing, we and Twitter may be regarded as “joint controllers”, meaning that we jointly determine the purposes and means of processing your personal data. In addition to the processing of personal data stated in this Privacy Notice, we have no influence on the processing of personal data in connection with your use of our Twitter accounts or Twitter as such.

Discord:

If you visit our Discord server, please note that the operator of Discord is Discord Inc. or Discord Netherlands BV depending on where you are located (hereinafter collectively "**Discord**"). Discord collects and processes personal data to the extent described in its privacy policy, which can be found [here](#).

We may receive certain anonymized statistical information from Discord regarding the use of our Discord server.

With respect to the above processing, we and Discord may be regarded as "joint controllers", meaning that we jointly determine the purposes and means of processing your personal data. In addition to the processing of personal data stated in this Privacy Notice, we have no influence on the processing of personal data in connection with your use of our Discord server or Discord as such.

Telegram:

If you visit our Telegram channels or groups, please note that the operator of Telegram is Telegram Messenger Inc. ("**Telegram**"). Telegram collects and processes personal data to the extent described in its privacy policy, which can be found [here](#).

We may receive certain anonymized statistical information from Telegram regarding the use of our Telegram groups or channels.

With respect to the above processing, we and Telegram may be regarded as "joint controllers", meaning that we jointly determine the purposes and means of processing your personal data. In addition to the processing of personal data stated in this Privacy Notice, we have no influence on the processing of personal data in connection with your use of our Telegram groups or channels, or Telegram as such.

Medium:

If you visit our Medium blogs, please note that the operator of Medium is A Medium Corporation ("**Medium**"). Medium collects and processes personal data to the extent described in its privacy policy, which can be found [here](#).

We use the statistical information (which includes the number of readers, commenters, claps, etc.) related to our Medium blogs. Such statistical information is anonymous and does not allow us to identify any particular individual.

With respect to the above processing, we and Medium may be regarded as "joint controllers", meaning that we jointly determine the purposes and means of processing your personal data. In addition to the processing of personal data stated in this Privacy Notice, we have no influence on the processing of personal data in connection with your use of our Medium blogs or Medium as such.

Contact Data:

We process your Contact Data to respond to your inquiry and the legal basis is our legitimate interest to do the same.

How long we process your data

As a general rule, we keep the personal 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 personal data longer.

Wallet Data:

We process your Wallet Data as long as you keep your Wallet connected to the Platform. Please note that due to the nature of the blockchain, the Wallet Data may be stored on the blockchain network permanently and accessed by us or any third party at any time.

Cookies:

The applicable storage periods for cookies are outlined below in the dedicated Cookies section of this Privacy Notice.

Social Media Data:

We do not establish any retention period for statistical and analytical information received from Social Media, because such information is anonymised and does not allow us to identify any particular individual.

If not expressly provided otherwise (e.g. in a specific consent form or privacy notice or statement), we will retain your personal data as soon as it is necessary for the purposes mentioned above in the dedicated Social Media Data subsection of this Privacy Notice.

We may retain your personal data longer, if it is necessary (1) according to our legal obligations (such as data retention periods provided for by commercial or tax law) or (2) to resolve disputes and lawsuits, exercise or defend legal claims or lawsuits.

Contact Data:

We store the contact data for one (1) year from the date when you contacted us. We set this retention period due to the statutes of limitations established in our [Terms of Service](#). In case of pending legal actions, we may process the Contact Data longer.

Your information and blockchain

Please note that the Transactions and Address interact with public decentralised blockchain infrastructures and blockchain-based software, including smart-contracts, that work autonomously. When we say that a blockchain is decentralised we mean that there is no single person, including us, who controls the blockchain or stores data available thereon and when we say “public” we mean that the access is available for anyone and cannot be restricted. The data entered in a public decentralised blockchain is distributed via the nodes that simultaneously store all records entered into the blockchain.

By design, blockchain records cannot be changed or deleted and are said to be “immutable”. Please be aware that any transaction within a blockchain is irreversible and information entered into a blockchain cannot be deleted or changed. Therefore, your ability to exercise certain data protection rights or abilities may be limited.

In addition, due to the blockchain’s nature, the information that was entered in a blockchain will be publicly available and we will neither control such information nor manage access to it. Once you start carrying out Transactions, certain data, which may be considered personal, will become publicly available on a blockchain. The ultimate decision whether to transact on a blockchain or carry out Transactions rests with you.

Cookies

General

Cookies are, in effect, small data files that are placed on the browser of a visitor's device (for example, computer, smartphone, tablet) when accessing online content and by which it is possible to recognise that device when it interacts with or returns to the Platform (the "**Cookies**"). Cookies help us to provide a better experience by enabling us to understand how visitors interact with the Platform and to ensure basic functionalities and security features of the Platform.

Cookies and similar technologies use unique codes that act as an identifier and, in certain circumstances, may be treated as personal data under the applicable data protection legislation. This is because they can enable the user of a device to be uniquely recognised as the same user, even if their "real world" identity is unknown.

We collect essential and non-essential Cookies. Essential Cookies are required for the Platform to operate properly. We do not need your consent to operate essential Cookies since these Cookies ensure basic functionalities and security features of the Platform and do not allow us to identify any particular individual.

We are required to get your consent to operate non-essential Cookies, used to analyse your behaviour on the Platform, or to build your advertising profile and identify you for ad targeting. When you first access the Platform, you have the right to decide whether to accept or reject non-essential Cookies. You do not need to allow non-essential Cookies to access and use the Platform. However, enabling non-essential Cookies may allow for a more tailored browsing experience. Please note that we may involve third-party service providers to collect and process certain Cookies.

We are the data controllers for the processing of personal data in connection with Cookies used on the Platform. You may opt-out of collecting Cookies by blocking them and similar tracking technologies in your browser settings or within the Cookies preference centre, if it is available on the Platform.

Google Analytics

We use Google Analytics to analyse the use of the Platform. Google Analytics gathers information about the use of the Platform by means of Cookies. They allow the Platform to remember your actions and preferences over a period of time to improve the Platform. The Google Analytics Cookies are stored for up to 24 months. Particular Cookie expiration periods set out by Google Analytics can be found [here](#).

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**").

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. After collecting the personal data, Google Analytics creates reports about the use of the Platform, 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 Platform. Please note that according to [Google Analytics documentation](#), the IP address is anonymised (masked), so neither we nor Google can identify the IP address as well as precise location (country, city, region, ZIP code) of a particular visitor.

In addition to the above, with Google Analytics we collect certain information regarding the use of the Platform, 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 Platform visitors.

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](#).

You may object to the collection of personal data by Google Analytics on any website by downloading and installing the [browser add-on from Google](#).

Third-party links

This Platform may include links and social media plugins to 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 Platform, we encourage you to read the privacy policy/notice/statement of every website or application you visit.

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 a “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 a “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. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time 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;
- **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 will particularly depend on where you are located.

Please note that due to the nature of the processing operations, we may not be able to exercise certain rights that you may have pursuant to the applicable data protection legislation. When interacting with a blockchain we may not be able to ensure that your personal data is deleted, corrected, or restricted. This is because the blockchain is a public decentralised network and blockchain technology does not generally allow for data to be deleted or changed and certain rights, such as your right to erasure, right to rectification, right to object, or restrict processing of your personal data cannot be enforced. In these circumstances, we will only be able to exercise your rights with respect to the information that is stored on our servers and not on a blockchain. If you want to ensure your privacy rights are not affected in any way, you should not transact on public blockchains as certain rights may not be fully available or exercisable by you or us due to the technological infrastructure of the blockchain. You may learn more above in the “Your information and blockchain” section of this Privacy Notice.

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.

Children personal data

The Platform 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.

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 Platform prior to the change becoming effective.