

Privacy Policy Planq Dev B.V.

Last amended on 15 November 2022

Version 1.0

In this Privacy Policy, Planq Dev B.V. (hereinafter: the "Planq", "us", or "we") explains which Personal Data is collected when you use our services. This includes our mobile apps (hereinafter: the "App"), our website <https://planq.network> (hereinafter: the "Website"), and our platform <https://app.planq.network> (hereinafter: the "Platform"). The App, Website and Platform are collectively also referred to as the "Services". Planq values your privacy and the protection of your personal data. Personal data will therefore be processed carefully and in accordance with this Privacy Policy and applicable laws and regulations.

If you have any questions or wish to receive further information, please contact us using the contact details at the bottom of this Privacy Policy.

1. When does this Privacy Policy apply?

This Privacy Policy applies to the visit of the Website and the use of the App and/or Platform. If necessary, we make a distinction in this Privacy Policy between the Website, App and Platform. However, this Privacy Policy only applies to processing of Personal Data by us as a controller. If a third party processes your Personal Data through our Services, then this third party is the controller. We are then the processor. In that case, this Privacy Policy does not apply.

2. Your privacy is of great importance to us

We believe that careful handling of Personal Data is of great importance. Personal Data is therefore processed carefully and in accordance with this Privacy Policy and the applicable laws and regulations.

This means that we:

- I. Clearly define our purposes before we process your Personal Data, via this Privacy Policy;
- II. Store as little Personal Data as possible and only process the Personal Data that is necessary for our purposes;
- III. Only process Personal Data if there is a valid basis;
- IV. The necessary security measures are taken to protect your Personal Data. We also impose these obligations on parties that process Personal Data for us;
- V. Respect your rights, such as the right to access, correction, data portability or deletion of your Personal Data processed by us.

If you have any questions or would like more information about the handling of your Personal Data, please contact us using the contact details provided in this Privacy Policy.

3. Personal Data

When we use the term "Personal Data" in this Privacy Policy, we mean information relating to you, as defined in Article 4 (1) of the General Data Protection Regulation (hereinafter: the "GDPR").

4. Planq

For questions and/or comments about the processing of your Personal Data, please contact us via the contact details below:

Planq Dev B.V.
Copernicusstraat 11
6003 DE Weert

+31 (0)495 623 586

5. The Personal Data which we can process when you visit our Website (<https://planq.network>)

When you visit our Website as a visitor, we may process certain Personal Data about you. This concerns the following processing of Personal Data.

When filling out a form on our Website

There are various forms available on our Website, such as a contact form. In the form we can request the following information from you:

- First name (*)
- Last name (*)
- Company
- Email address (*)
- Wallet address
- Phone number
- Other information that is relevant to the request

The basis for this processing of Personal Data is Article 6 (1) f of the GDPR: we have a legitimate interest in this processing, because otherwise we will not be able to contact you. We will retain this data for as long as necessary for the contact between you and us. We delete the data six (6) months after the last contact between you and us. If you wish to have your data deleted immediately, you may request that we do so. We will make an exception to the six (6) month requirement if it is necessary by law to keep Personal Data for a longer period.

The information indicated with an asterisk (*) are mandatory in our forms. The other information is optional.

When you contact us

You can also contact us in other ways than filling out a form. This can be done, for example, by phone or email. With a contact request, we can ask you for the following information, among other things:

- First name
- Last name
- Company
- Email address
- Wallet address
- Phone number
- Other information that is relevant to the request

The basis for this processing of Personal Data is Article 6 (1) f of the GDPR: we have a legitimate interest in this processing, because otherwise we will not be able to contact you. We will retain this data for as long as necessary for the contact between you and us. We delete the data six (6) months after the last contact between you and us. If you wish to have your data deleted immediately, you may request that we do so. We will make an exception to the six (6) month requirement if it is necessary by law to keep Personal Data for a longer period.

When you create an account on our Website

You can create an account on our Website. When creating an account we can ask you for the following information, among other things:

- First name
- Last name
- Company
- Email address
- Wallet address (*)
- Phone number

We will retain this data for as long as your account is active. We delete the data six (6) months after the account is deleted or terminated, so that we can still answer any questions. If you wish to have your data deleted immediately, you may request that we do so. We will make an exception to the six (6) month requirement if it is necessary by law to keep Personal Data for a longer period.

Wallet connect

In order to use our Website with a non-custodial wallet (i.e. MetaMask and TrustWallet) you can connect your wallet to the Website. When connecting your wallet, we can ask you for your permission to view your wallet address.

We will retain this data for as long as your wallet is connected to our Website. We delete this data no longer than six (6) months after the wallet is disconnected to the Website. The basis for the processing of this Personal Data is Article 6 (1) a GDPR: you have given permission for the processing of Personal Data.

Marketing messages and newsletters

If you have opted to receive marketing communications, we will be happy to send you news items that may be of interest to you. You can subscribe to our newsletter by entering your email address and/or by indicating that you wish to receive the newsletter when registering an account. In the newsletter you can read news, tips and information about our Services. The basis for the processing of this Personal Data is Article 6 (1) a GDPR: you have given permission for the processing of Personal Data. We will retain this data until the subscription is terminated.

After subscribing to the newsletter, your email address will automatically be added to the list of subscribers. Every newsletter contains an unsubscribe link with which you can unsubscribe from the newsletter.

6. When you use our Platform (<https://app.planq.network>) as a user

When you use our Platform as a user, we may process certain Personal Data about you. We provide various services on our Platform, whereby various Personal Data are processed. Below is stated per service which Personal Data we process.

When you contact us

You can contact us, for example, by phone or email. With a contact request, we can ask you for the following information, among other things:

- First name
- Last name
- Company
- Email address

- Wallet address
- Phone number
- Other information that is relevant to the request

The basis for this processing of Personal Data is Article 6 (1) f of the GDPR: we have a legitimate interest in this processing, because otherwise we will not be able to contact you. We will retain this data for as long as necessary for the contact between you and us. We delete the data six (6) months after the last contact between you and us. If you wish to have your data deleted immediately, you may request that we do so. We will make an exception to the six (6) month requirement if it is necessary by law to keep Personal Data for a longer period.

Wallet connect

In order to use our Platform with a non-custodial wallet (i.e. MetaMask and TrustWallet) you can connect your wallet to the Platform. When connecting your wallet, we can ask you for your permission to view your wallet address.

We will retain this data for as long as your wallet is connected to our Platform. We delete this data no longer than six (6) months after the wallet is disconnected to the Platform. The basis for the processing of this Personal Data is Article 6 (1) a GDPR: you have given permission for the processing of Personal Data and it is needed to give you access to our Platform (a legitimate interest (Article 6 (1) (f) GDPR)).

7. When you use our App as a user

When you use our App, whether on Android or iOS, as a user, we may process certain Personal Data about you. We provide various services on our App, whereby various Personal Data are processed. Below is stated per service which Personal Data we process.

When you contact us

You can contact us, for example, by phone or email. With a contact request, we can ask you for the following information, among other things:

- First name
- Last name
- Company
- Email address
- Wallet address
- Phone number
- Other information that is relevant to the request

The basis for this processing of Personal Data is Article 6 (1) f of the GDPR: we have a legitimate interest in this processing, because otherwise we will not be able to contact you. We will retain this data for as long as necessary for the contact between you and us. We delete the data six (6) months after the last contact between you and us. If you wish to have your data deleted immediately, you may request that we do so. We will make an exception to the six (6) month requirement if it is necessary by law to keep Personal Data for a longer period.

When you create an account on our App

You can create an account on our App. When creating an account we can ask you for the following information, among other things:

- First name
- Last name
- Company
- Email address

- Wallet address (*)
- Phone number

We will retain this data for as long as your account is active. We delete the data six (6) months after the account is deleted or terminated, so that we can still answer any questions. If you wish to have your data deleted immediately, you may request that we do so. We will make an exception to the six (6) month requirement if it is necessary by law to keep Personal Data for a longer period.

Wallet connect

In order to use our App with a non-custodial wallet (i.e. MetaMask and TrustWallet) you can connect your wallet to the App. When connecting your wallet, we can ask you for your permission to view your wallet address.

We will retain this data for as long as your wallet is connected to our Platform. We delete this data no longer than six (6) months after the wallet is disconnected to the Platform. The basis for the processing of this Personal Data is Article 6 (1) a GDPR: you have given permission for the processing of Personal Data and it is needed to give you access to our Platform (a legitimate interest (Article 6 (1) (f) GDPR)).

8. When you visit our Website (<https://planq.network>) as a visitor and when you use our Platform (<https://app.planq.network>) and our App as a user

In addition to the processing of Personal Data as mentioned above, there are some other processing that may occur both when visiting our Website and when using our Platform and App.

Cookies

Planq uses functional, analytical and tracking cookies. A cookie is a small text file that is stored in the browser of your computer, tablet or smartphone when you first visit the Website. Planq uses cookies with purely technical functionality. These ensure that the Website, Platform and App work properly and that, for instance, your preferences are remembered. These cookies are also used to optimise the Website, Platform and App. In addition, we place cookies that track your surfing behaviour, so that we can offer you personalised content and advertisements. When you first visited our Website, Platform or App, we already informed you about these cookies and asked your permission to place tracking cookies. You can opt-out of cookies by configuring your internet browser so that it does not store cookies anymore. In addition, you can delete all information previously stored in the settings of your browser.

Logging

We use logging on our Website, Platform and App. Logging is the automatic recording of certain data.

We keep logs from the Website, Platform and App. These logs are stored in log files. These log files include the IP address of the visitor or user, the browser that the visitor or user uses, the time the visitor visited our Website or the user used our Platform or App and which pages the visitor or user visited during his visit.

The log files are used, among other things, to manage the Website, Platform and App, to keep track of visit and usage statistics, to prevent misuse of the Website, Platform and App and to ensure security.

We also use logs to detect and resolve errors and bugs on the Website, Platform and App. These logs are necessary so that we can respond as quickly as possible to possible problems with the Website, Platform and App.

The log data will be pseudonymised as much as possible. This means that the log data cannot be linked to you without additional data being used.

Please note that the logs mentioned above expressly do not include keylogs and/or logs of seedphrases and/or logs of (wallet) passwords.

The legal basis for the processing of this Personal Data is Article 6 (1) f. of the GDPR: we have a legitimate interest in this processing. This information is required for the Website, Platform and App to function properly.

9. When you supply goods or services to Planq as a business partner

When you supply goods or services to Planq as a business partner, we collect and use your business contact details only for the purpose of our cooperation. The basis for the processing of this Personal Data is Article 6 (1) b of the GDPR: the processing is necessary for the performance of the agreement. We delete the data six (6) months after the last goods or services have been supplied to us.

10. Security

We protect your Personal Data by taking technical and organisational measures against unauthorised, unlawful or accidental access, loss, destruction or damage to Personal Data. We continuously take steps to improve data security.

We ensure that only necessary persons have access to your Personal Data, that access to Personal Data is secured and that our security measures are regularly checked and evaluated. We take – among others – the following security measures:

- I. We have secured the connections to our websites via Secure Socket Layer (SSL) technology;
- II. Databases with Personal Data are encrypted;
- III. We have a policy document that explicitly discusses the measures we take to secure the processing of data and to ensure privacy;
- IV. Our employees involved in the processing of Personal Data are obliged to maintain confidentiality;
- V. Our IT facilities and equipment are physically protected against unauthorised access and against damage and malfunctions;
- VI. There are procedures in place to give authorised users access to the information systems and services they need to perform their tasks and to prevent unauthorised access to information systems;
- VII. Strong, unique passwords and password vaults are used;
- VIII. There are procedures for the acquisition, development, maintenance and destruction of data and information systems;
- IX. Activities that users perform (with Personal Data) are recorded in log files. The same applies to other relevant events, such as attempts to gain unauthorised access to Personal Data and disruptions that may lead to alteration or loss of Personal Data;
- X. Security measures are built into all application systems, including adequate access management;
- XI. A procedure is available to deal with possible data breaches;
- XII. We ensure that our IT infrastructure is provided with security updates in a timely manner; and
- XIII. We randomly check compliance with the policy.

The Personal Data is stored with parties that can ensure careful security. With these parties agreements have been made that are necessary for the processing of Personal Data. Insofar as the data centres of these parties are located outside the European Economic Area (EEA), appropriate safeguards have been put in place to make the transfer possible.

11. Your rights

In the context of our processing of your Personal Data, you have, among others, the following rights:

- I. The right to examine your Personal Data that we process;
- II. If you have consented to the processing of your Personal Data, you have the right to withdraw such consent;
- III. The right to exercise data portability;
- IV. The right to have errors corrected;
- V. The right to have outdated Personal Data deleted;
- VI. The right to object to a specific use of Personal Data.

If you want to exercise these rights, please contact us. Please describe as clearly as possible in your request which Personal Data you are referring to.

You can only exercise your rights to the extent that the law grants you such rights. To ensure that a request is made by you, we may ask you to enclose a copy of your identification with the request. We will only ask you to do so if we deem it necessary to identify you. We will destroy the copy of your identification immediately after we have identified you.

12. Third parties

We do not sell your data to third parties. We may, however, engage third parties who process certain Personal Data under our responsibility.

Some of these third parties are located in the EEA. Some third parties may be located in countries outside the EEA, such as the United States. In order to protect your Personal Data and to comply with our legal obligations, we will only engage third parties as processors if those third parties offer sufficient safeguards for the protection of your Personal Data. We will conclude a data processing agreement with these third parties, which provides appropriate protection with regard to your Personal Data. These third parties may only process the Personal Data in the context of the assignment we have given them, and not for other purposes.

13. Updates to this Privacy Policy

The way we process Personal Data, and the composition of the data we process, may change. Planq reserves the right to modify this Privacy Policy at any time. Therefore, Planq encourages you to check the Privacy Policy regularly in order to be aware of any changes. We will endeavour to notify you of any major changes. That way, we ensure that you are aware of any recent major changes.

14. Third party services

This Privacy Policy does not apply to third party services that are linked to our Services. We cannot guarantee that these third parties will handle your Personal Data in a reliable or secure manner. We recommend that you read the privacy policies of these websites before using them.

15. Complaints

If you have a complaint about the way we process your Personal Data, you can contact us. We then try to find a solution together. You also have the right to lodge a complaint with the supervisory authority. In the Netherlands this is the Dutch Data Protection Authority (in Dutch: "Autoriteit Persoonsgegevens").
