

Minted Privacy Notice

Effective Date: 11 August 2022

Welcome to Minted Privacy Notice for services provided by Cronos Labs (“Privacy Notice”). Please spend a few minutes to read it carefully before providing us with any information about you or any other person.

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1. Introduction

We respect your privacy, and we are committed to protecting your personal data. This Privacy Notice applies to the processing of personal data by Cronos Labs (“Cronos”, “we”, “us”, “our”) in connection with:

- use of the Minted NFT Platform (“Minted”) or any services which relate to the non-fungible tokens (“NFT”) services as provided on Minted (together the “Services”),
- visit or use of our website (“Site”) to the extent related to the Services.

Please note that our Services and Site are not intended for minors below the age of 18 years and we do not knowingly collect data relating to minors.

When you decide to connect your third party wallet address to Minted, please carefully read the third party wallet’s privacy notice or policy.

2. Purpose

This Privacy Notice aims to give you information on why and how we collect and process your personal data. For the purposes of this Privacy Notice, the terms “personal data” and “personal information” shall be used interchangeably and have the meaning as defined under the applicable privacy legislation.

This Privacy Notice informs you about your privacy rights and how the data protection principles set out in the applicable privacy legislation protect you.

It is important that you read this Privacy Notice so that you are fully aware of why and how we are using your data.

Please note that all or part of our Services may not be available in your region.

3. Who we are

Data Controller

Cronos Labs is the data controller and is responsible for the processing of your personal data.

Data Protection Officer

Our Data Protection Officer (“DPO”) is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions or complaints related to this Privacy Notice or our privacy practices, or if you want to exercise [your legal rights](#), please contact our DPO at support@minted.network.

Complaints

You have the right to make a complaint about the way we process your personal data to a supervisory authority. If you reside in an EEA Member State, you have the right to make a complaint about the way we process your personal data to the supervisory authority in the EEA Member State of your habitual residence, place of work or place of the alleged infringement. Information about your supervisory authority could be found [here](#) (*attention: a link to a third-party website*). You may also contact your local data protection regulatory authority.

We would, however, appreciate the chance to deal with your concerns before you approach a data protection regulatory authority, so please feel free to contact us in the first instance.

Our duties and your duties in case of changes

We keep our Privacy Notice under regular review. This version was last updated on the date above written. Please check from time to time for new versions of the Privacy Notice. We will also additionally inform you on material changes of this Privacy Notice in a manner which will effectively bring the changes to your attention.

It is important that the personal data we hold about you is accurate and up-to-date. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

The Site and any applicable web browser required to access the Services may include links to third-party websites, plug-ins and applications (“Third-Party Sites”). 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 Sites and are not responsible for their privacy statements and policies. When you leave our Site, we encourage you to read the privacy notice or policy of every Third-Party Site you visit or use.

4. What data we collect about you

Personal data

Personal data, or personal information means any information that relates to an identified or identifiable living individual. This is a broad definition which includes the specific pieces of personal data which we have described below. It does not include data which cannot be used to identify an individual person, such as a company registration number.

A “data subject” is an individual who can be identified, directly or indirectly, by personal data.

Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data. It does not include data where the identity has been removed (anonymous data).

Depending on whether and how you use our Services or Site, we will process different kinds of personal data about you which we have grouped in categories as follows:

Category of personal data	Examples of specific pieces of personal data
Identity Data	<ul style="list-style-type: none">● display name,● profile picture,● short biography,● social media accounts information.
Contact Data	<ul style="list-style-type: none">● email address.
Financial Data	<ul style="list-style-type: none">● virtual currency accounts,● amounts associated with accounts,● external account details,● other types of financial data related to the use of the Services or Site.
Transactional Data	<ul style="list-style-type: none">● details about payments to or from you,● other details of any transactions you enter into using the Services or Site.
Investment Data	<ul style="list-style-type: none">● information about:<ul style="list-style-type: none">○ royalties and fees,○ sales price and sell-through information.

Technical Data	<ul style="list-style-type: none">● internet connectivity data,● internet protocol (IP) address,● login data,● browser type and version,● device type, category and model,● time zone setting and location data,● browser plug-in types and versions,● operating system and platform,● diagnostics data such as crash logs and any other data we collect for the purposes of measuring technical diagnostics, and● other technology or information stored on the devices you allow us access to when you visit the Site, or use the Services.
Profile Data	<ul style="list-style-type: none">● your identification number as our user,● requests by you related to products or services,● your interests, preferences and feedback● other information generated by you when you communicate with us, for example when you address a request to our customer support.
Usage Data	<ul style="list-style-type: none">● information about how you use the Site, the Services and other offerings made available by us, including:<ul style="list-style-type: none">○ interaction type and time,○ event time, name and source.
Marketing and Communications Data	<ul style="list-style-type: none">● your preferences in receiving marketing from us or third parties,● your communication preferences,● your survey responses.

Special categories of personal data

Certain types of sensitive personal data are subject to additional protection under the legislation applicable to you. They are called “special categories” of personal data. Where we are required to process sensitive personal data (e.g. for compliance with regulatory and legal obligations) we will notify you and provide you with additional information.

If you refuse to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you refuse to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you – for example, to provide you Services. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

5. How we collect your data

We use different methods to collect information from and about you, including through:

Direct interactions. You may give us your [Identity Data](#), [Contact Data](#), [Financial Data](#), [Investment Data](#), [Profile Data](#) and [Marketing and Communications Data](#) by directly interacting with us, including by filling in forms, by email or otherwise. This includes personal data you provide when you:

- visit our Site;
- create an account;
- make use of any of our Services;
- request marketing to be sent to you, for example by subscribing to our newsletters;
- enter a competition, promotion or survey, including through social media channels;
- give us feedback or contact us.

Automated technologies or interactions. As you interact with us via our Site, we will automatically collect [Technical Data](#) about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We will also collect [Transactional Data](#), [Investment Data](#) and [Usage Data](#). We may also receive [Technical Data](#) and [Marketing and Communications Data](#) about you if you visit other websites employing our cookies.

Third parties or publicly available sources. We also obtain information about you from third parties or publicly available sources. These sources may include:

- public blockchain,
- publicly available information on the Internet (websites, articles etc.)

6. How we use your data

Lawful basis

We will only use your personal data when the applicable legislation allows us to. In other words, we have to ensure that we have a lawful basis for such use.

Most commonly, we will use your personal data in the following circumstances:

- performance of a contract: means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract; we use this basis for provision of our Services;
- legitimate interests: means our interests (or those of a third party), where we make sure we use this basis as far as your interests and individual rights do not override those interests;
- compliance with a legal obligation: means processing your personal data where we need to comply with a legal obligation we are subject to;
- consent: means freely given, specific, informed and unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to you; under specific circumstances this consent should be explicit – if this is the case, we will ask for it properly.

Purposes for which we use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose and/or activity	Categories of personal data	Lawful basis for processing
To register you as a new customer	<ul style="list-style-type: none"> ● Identity Data ● Financial Data 	<ul style="list-style-type: none"> ● Performance of a contract
To process and deliver our Services and any features to you, including to execute, manage and process any instructions or orders you make	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Financial Data ● Transactional Data ● Investment Data ● Technical Data ● Marketing and Communications Data 	<ul style="list-style-type: none"> ● Performance of a contract
To prevent abuse of our Services and promotions	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Financial Data ● Transactional Data ● Investment Data ● Technical Data ● Marketing and Communications Data 	<ul style="list-style-type: none"> ● Legitimate interests
To manage our relationship with you which will include asking you to leave a review, take a survey or keeping you informed of our company's business and product development	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Profile Data ● Transactional Data ● Investment Data ● Marketing and Communications Data 	<ul style="list-style-type: none"> ● Performance of a contract ● Consent, if required

<p>To keep our records updated and to study how customers use our products/services</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Profile Data ● Transactional Data ● Investment Data ● Marketing and Communications Data 	<ul style="list-style-type: none"> ● Legitimate interests ● Consent, if required
<p>To manage, process, collect and transfer fees, and to collect and recover payments owed to us</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Financial Data ● Investment Data 	<ul style="list-style-type: none"> ● Performance of a contract
<p>To ensure good management of our fees and collection and recovery of payments owed to us</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Financial Data ● Investment Data 	<ul style="list-style-type: none"> ● Legitimate interests
<p>To obey laws and regulations which apply to us and response to complaints and resolving them</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Financial Data ● Technical Data ● Transactional Data ● Investment Data 	<ul style="list-style-type: none"> ● Compliance with a legal obligation ● Legitimate interests: to ensure effective dealing with complaints
<p>To enable you to partake in a promotion, prize draw, competition or complete a survey</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Profile Data ● Usage Data ● Marketing and Communications Data 	<ul style="list-style-type: none"> ● Performance of a contract ● Consent, if required

<p>To gather market data for studying customers' behavior including their preference, interest and how they use our products/services, determining our marketing campaigns and growing our business</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Profile Data ● Usage Data ● Marketing and Communications Data 	<ul style="list-style-type: none"> ● Legitimate interests: understanding our customers and improving our products and services
<p>To administer and protect our business, our Site and social media channels including bans, troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Financial Data ● Technical Data ● Transactional Data ● Investment Data 	<ul style="list-style-type: none"> ● Legitimate interests: to run of our business, provision of administration and IT services, network security and in the context of a business reorganization or group restructuring exercise
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Profile Data ● Usage Data ● Marketing and Communications Data ● Technical Data 	<ul style="list-style-type: none"> ● Legitimate interests: to study how customers use our products/services, to develop them, growing our business and to form our marketing strategy ● Consent, if required
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> ● Technical Data ● Usage Data 	<ul style="list-style-type: none"> ● Legitimate interests: to define types of customers for our products and services, to keep our website updated and relevant, to develop our

		business and to form our marketing strategy <ul style="list-style-type: none"> • Consent, if required
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> • Identity Data • Contact Data • Technical Data • Usage Data • Profile Data • Marketing and Communications Data • Investment Data 	<ul style="list-style-type: none"> • Legitimate interests: to develop our products/services and grow our business • Consent, if required

Marketing

You will receive marketing communications from us if you have requested information from us and consented to receive marketing communications. We will use your [Contact Data](#) and [Marketing and Communications Data](#) for our respective activities.

Third-party marketing

We will get your opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Further, you can let us know directly that you prefer not to receive any marketing messages by emailing support@minted.network.

Where you opt out of receiving marketing messages, this will not apply to service messages which are directly related to the use of our Services (e.g. maintenance, change in the terms and conditions and so forth).

Cookies

Most browsers automatically accept cookies.

However, you can configure your browser not to save any cookies on your computer or to always show you a notification before setting a new cookie. The management of cookie settings varies from browser to browser. It is described in the "Help" menu of each browser, where the way to change the cookie settings is explained. Follow the links below according to the browser you are using (*attention: a link to a third-party website*):

- [Internet Explorer](#)
- [Firefox](#)
- [Chrome](#)
- [Safari](#)
- [Opera](#)

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Sale or transfer of business

We may also need to process your data in connection with or during the negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving all or a part of our shares, business or assets. This will be based on our legitimate interests in carrying out such transaction, or to meet our legal obligations.

7. Disclosures of your data

We share your personal data with our third-party service providers, agents, subcontractors and other associated organizations, in order to complete tasks related to the use of the Site or Services to you on our behalf. When using third party service providers, they are required to respect the security of your personal data and to treat it in accordance with the law.

We may pass your personal data to the following entities:

- companies and organizations that assist us in providing any of the Services that you have requested;
- anyone to whom we lawfully transfer or may transfer our rights and duties under the relevant terms and conditions governing the use of any of the Services;

- any third party because of any restructure, sale or acquisition, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us; and
- regulatory and law enforcement authorities, whether they are outside or inside of the EEA, where the law allows or requires us to do so.

8. International transfers

Whenever we transfer your personal data out of the EEA or the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- the country to which we transfer your personal data has been deemed to provide an [adequate level of protection](#) (*attention: third-party website link*) for personal data by the European Commission;
- a specific contract approved by the European Commission which gives safeguards to the processing of personal data, the so-called Standard Contractual Clauses.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA or the UK.

9. Data security

While there is an inherent risk in any data being shared over the internet, we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, damaged, or accessed in an unauthorised or unlawful way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Depending on the nature of the risks presented by the proposed processing of your personal data, we will have in place the following appropriate security measures:

- organisational measures (including but not limited to staff training and policy development);
- technical measures (including but not limited to physical protection of data, pseudonymization and encryption); and
- securing ongoing availability, integrity, and accessibility (including but not limited to ensuring appropriate back-ups of personal data are held).

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

10. Data retention

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Here are some exemplary factors which we usually consider when determining how long we need to retain your personal data:

- in the event of a complaint;
- if we reasonably believe there is a prospect of litigation in respect to our relationship with you or if we consider that we need to keep information to defend possible future legal claims (e.g. email addresses and content, chats, letters) will be kept in accordance with the statutory limitation period applicable following the end of our relationship;
- to comply with any applicable legal and/or regulatory requirements with respect to certain types of personal data, if information is needed for audit purposes and so forth;
- in accordance with our legitimate business need to prevent abuse of the promotions that we launch. We will retain a customer's personal data for the time of the promotion and for a certain period after its end to prevent the appearance of abusive behaviour.

Please note that under certain condition(s), you can ask us to delete your data: see [your legal rights](#) below for further information. We will honor your deletion request ONLY if the condition(s) is met.

11. Your legal rights

You have rights we need to make you aware of. The rights available to you depend on our reason for processing your personal data. If you need more detailed information or wish to exercise any of the rights set out below, please [contact us](#).

You may:

- request access to your personal data, which enables you to obtain confirmation of whether we are processing your personal data, to receive a copy of the personal data we hold about you and information regarding how your personal data is being used by us;
- request rectification of your personal data by asking us to rectify information you think is inaccurate and to complete information you think is incomplete, though we may need to verify the accuracy of the new data you provide to us;
- request erasure of your personal data by asking us to delete or remove personal data we hold about you; note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you;
- object to the processing of your personal data, where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms; in some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms; you also have the right to object where we are processing your personal data for direct marketing purposes;
- require that decisions be reconsidered if they are made solely by automated means, without human involvement; you will be notified if decisions are made solely on an automated basis;
- request restriction of processing your personal data, which enables you to ask us to suspend the processing of your personal data, if you want us to establish the data accuracy; where our use of the data is unlawful, but you do not want us to erase it; 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, or if 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, and we will provide to you, or a third party you have chosen (where technically feasible), 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, but we will advise you if this is the case at the time you withdraw your consent;
- complain to any relevant authority about any perceived violation and to seek compensation for damages in the courts.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is manifestly unfounded or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

Period for replying to a legitimate request

We shall reply to a legitimate request within the legally prescribed period according to the applicable legislation. If you are a resident of the EEA or the UK, the statutory period for us to reply to a legitimate request is one month. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

Please note that we may request that you provide some details necessary to verify your identity when you request to exercise a legal right regarding your personal data.