PRIVACY POLICY

1. Introduction

At Get Nugget, operated by Get Nugget Ltd, we prioritise user privacy. This policy explains how we collect, use, and protect your personal information when using our platform.

2. Information Collection

We collect data to provide and improve our services:

Account Information: Email, encrypted password, username, optional profile details, and responses to cryptocurrency experience questionnaires.

Usage Data: Interaction history, votes, ratings, contributions, comments, and usage statistics.

Technical Data: IP address, device details, browser type, operating system, access timestamps, and cookies.

Payment and Billing Information: When you subscribe to a paid plan or activate a free trial that requires verification, we may collect billing-related data, including:

- Your selected subscription plan (e.g., Monthly, Yearly, Premium, Combo),
- Payment method metadata (e.g., masked card details, issuing country, payment provider),
- Billing country or region,
- Transaction identifiers, timestamps, and invoice details.

All sensitive payment data is processed securely via our third-party payment processors and is never stored directly on Get Nugget servers. We retain only metadata necessary to confirm payment status, manage subscriptions, detect fraud, and comply with applicable financial regulations.

3. Use of Information

We use your personal data to operate and improve our services and features. This includes:

- Managing user accounts and ensuring proper authentication and security,
- Enabling participation in community features, such as contributions, comments, and discussions,
- Personalising your experience based on your profile and preferences,
- Analysing market trends and cryptocurrency projects using AI and user-generated input,
- Communicating important updates, service-related notifications, and responses to user inquiries.

In addition, your activity data (such as validated contributions, leaderboard position, and participation in challenges) may be used to assign XP Points as part of our gamification system. These points may be visible to other users and used to access exclusive features, events, or future reward programmes.

We also process access and activity logs to determine eligibility for subscription refunds under applicable consumer protection laws. In accordance with Article 16(m) of the EU Consumer Rights Directive, your right of withdrawal may be forfeited once you access subscriber-only digital content.

To enforce this, we record whether and when you access premium features, including:

- Scoring dashboards and analysis reports,
- Paid watchlist functionality,
- Subscriber-only data or interactive modules.

This access data is only used to manage refund eligibility, prevent abuse of free trials or refund policies, and ensure compliance with EU legal obligations.

4. Cookies

We use cookies to enhance functionality and monitor performance. Essential cookies support authentication and security, while analytics cookies help track usage patterns and

detect errors. You can manage cookies via browser settings, though some features may be affected.

Our platform uses various cookies and local storage solutions to enhance your experience:

4.1 Analytics Cookies

Google Analytics cookies:

- _ga: Primary cookie used to distinguish unique users on the website.
- _ga_XXXXXXXXXX: Specific to Google Analytics 4 (GA4), used to maintain user session state.

4.2 Performance Monitoring Cookies

LogRocket cookies for session tracking and debugging:

- *lr_uf*-x9fiwf: Records user sessions and replays actions.
- *lr_tabs*-x9fiwf%2Fget-nugget: Manages active user tabs during a session.
- *lr_hb*-x9fiwf%2Fget-nugget: Sends regular pings to indicate active sessions.

4.3 Essential Cookies

Platform functionality cookies:

- Authorisation: A secure HTTPS cookie (HTTP-only, Strict) managing API authentication.
- connect.sid: Session cookie for client-server data exchange.
- CleverCloud 'dds': Datadog integration for performance monitoring.

4.4 Local Storage

We use local storage for the following purposes:

- *lr_id*: LogRocket identifier for unique user identification.
- gn_language: Selected language preference.
- gn_login: Email address storage for "Remember me" functionality.
- tuiLanguage: Taiga UI framework language settings.

5. GDPR Compliance and User Rights

5.1 Legal Basis for Processing

We process your personal data on the following legal bases:

- **Consent**: When you explicitly accept our privacy policy, cookies, or other specific consent forms.
- **Contract Performance**: When processing is necessary to provide our services in accordance with our terms of use.
- **Legitimate Interests**: When processing is necessary for our legitimate interests or those of a third party, provided your fundamental rights and interests do not override these interests.
- **Legal Obligation**: When processing is necessary to comply with a legal obligation to which we are subject.

5.2 Rights of Data Subjects

As a user based in the European Economic Area (EEA), the United Kingdom, or another jurisdiction where GDPR or similar legislation applies, you have the following rights regarding your personal data:

- **Right of Access**: You have the right to obtain a copy of the personal data we hold about you and to be informed about how we use it.

- **Right to Rectification**: You can request correction of inaccurate or incomplete personal data concerning you.

- **Right to Erasure (Right to be Forgotten)**: You can request the deletion of your personal data in certain circumstances, for example, when the data is no longer necessary for the purposes for which it was collected.

- **Right to Restriction of Processing**: You can request that we restrict the processing of your personal data in certain circumstances, for example when you contest the accuracy of the data.

- **Right to Data Portability**: You have the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format, and to transmit this data to another data controller.

- **Right to Object**: You have the right to object at any time to the processing of your personal data based on our legitimate interests, including profiling. You also have the right to object to the processing of your data for direct marketing purposes.

- **Rights Related to Automated Decision-Making and Profiling**: You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you.

5.3 Procedures for Exercising Rights

To exercise any of these rights, please contact us at privacy@getnugget.net or by mail at the address provided in the "Contact" section. To protect your information, we may ask you to verify your identity before proceeding with your request.

We will endeavour to respond to all legitimate requests within one month. Occasionally, this timeframe might be extended if your request is particularly complex or if you have made several requests. In this case, we will inform you of this extension and the reasons for the delay.

The exercise of these rights is generally free of charge, unless requests are manifestly unfounded or excessive, particularly due to their repetitive nature. In such cases, we may charge a reasonable fee or refuse to act on the request.

5.4 International Data Transfers

Get Nugget operates from the Republic of Ireland, within the European Union. Your data may be processed outside the European Economic Area (EEA) when necessary to deliver services or interact with our third-party providers.

When personal data is transferred outside the EEA, we ensure adequate protection by implementing one or more of the following mechanisms:

- Transfers to countries recognised by the European Commission as providing an adequate level of protection.
- Use of Standard Contractual Clauses (SCCs) approved by the European Commission.
- Binding corporate rules within a corporate group.
- Adherence to approved certification mechanisms, such as the EU-U.S. Data Privacy Framework (where applicable).

5.5 Data Protection Officer (DPO)

Although our organisation is not legally required to appoint a Data Protection Officer, we have appointed a data protection manager who can be contacted for any questions regarding this privacy policy or the processing of your personal data:

Data Protection Manager, Get Nugget Ltd. Unit 4a Avonbeg Industrial Estate, Long Mile Road, Dublin 12, D12 C422, Ireland.

Email: privacy@getnugget.net

5.6 Supervisory Authority and Complaints

If you believe that the processing of your personal data constitutes a violation of the GDPR, you have the right to lodge a complaint with a supervisory authority, particularly in the Member State of your habitual residence, your place of work, or the place where the alleged violation took place.

For users based in Ireland, the supervisory authority is the Data Protection Commission:

- Website: www.dataprotection.ie.
- Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland.
- Phone: +353 578 684 800.

5.7 Automated Decision-Making and Profiling

Our platform uses artificial intelligence (AI) techniques for sentiment analysis, cryptocurrency trend detection, and personalisation of the user experience. These processes may involve automated decision-making and profiling.

The applied logic aims to improve your navigation experience and offer relevant insights on cryptocurrency projects. In some cases, user-submitted contributions may also be processed by AI systems to assign scores, detect patterns, and support community validation processes. These operations do not result in decisions that have legal effects on you, but they do influence what content or features you see on the Platform.

You have the right to request human intervention, express your point of view, and contest any decision based solely on automated processing. For further information about how these systems operate, please contact us at privacy@getnugget.net.

5.8 Data Retention

In accordance with the GDPR principle of storage limitation, we only retain your personal data for as long as necessary for the purposes for which it was collected, as detailed in section 7 of this policy. We retain data for active accounts and anonymise or delete inactive account data after 12 months. Public contributions may remain visible. Some data may be retained for legal or business reasons.

6. Data Security

We implement encryption, access controls, and regular audits to safeguard your data. In case of a breach, we notify relevant authorities and affected users promptly and take corrective action.

7. Third-Party Services

We use analytics providers to improve our platform but do not sell or share data for marketing purposes. Third-party tracking is not permitted.

We integrate with several third-party services to enhance platform functionality:

7.1 Communication Services

- Postmark for email communications.
- Active Campaign for user engagement.
- Twitter/X for social media integration.

7.2 Analytics and Monitoring

- Google Analytics for usage statistics.
- LogRocket for performance monitoring.
- Google NLP Service for text analysis.

7.3 Cryptocurrency Data

- Coingecko for cryptocurrency market data.

7.4 Community Engagement

- Zealy for community interaction.
- Make for workflow automation.

7.5 AI Services

- Integration with AI services (such as, but not limited to, ChatGPT or Claude) for enhanced analysis.

These services are carefully selected and configured to respect user privacy. We ensure that:

- Data sharing is limited to what's necessary for service functionality.
- No personal data is sold to third parties.
- Service providers comply with applicable data protection regulations.
- Users can opt out of non-essential services where possible.

8. Children's Privacy

Our services are strictly intended for individuals aged 18 and over. We do not knowingly collect or store personal data from anyone under this age. If we become aware that we have collected personal data from a minor, we will delete it promptly.

If you believe that your child has submitted personal data to us, please contact us immediately at privacy@getnugget.net so we can take appropriate action.

9. Policy Updates

We may update this policy and notify users of significant changes via platform notifications, email, or website announcements.

10. Contact Information

Get Nugget Ltd., Unit 4a Avonbeg Industrial Estate, Long Mile Road, Dublin 12, D12 C422, Ireland.

Email: hello@getnugget.net

Website: https://www.getnugget.net

App: https://app.getnugget.net

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