

# Superdao Privacy Policy

Last updated: December, 2022

## 1. PREAMBLE AND REMINDER

Thank you for your interest in Superdao. This Privacy Policy ("Privacy Policy") sets out how we collect, use, and manage the personal information we receive from you or a third party in connection with our provision of services to you or which we collect from your use of our website <https://superdao.co/> ("Site") and our other associated Services. All references to "Company", "we", "us", "our", or "Superdao" refer to Superdao Inc., a Delaware corporation.

BY ACCESSING THE SITE OR SERVICES AND/OR USING THE SITE OR SERVICES, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, INCLUDING TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION (AS DEFINED BELOW). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT USE THE SITE.

Please note that you are not legally obligated to provide us with any personal information. You hereby acknowledge and agree that you provide us with personal information at your own free will. You hereby agree that we may collect and use such personal Information pursuant to this Privacy Policy and applicable laws and regulations.

We fully understand and respect the importance of your personal information to you, and we will adopt corresponding appropriate safety protection measures to protect your personal Information in accordance with the requirements of the applicable laws and regulations. In view of this, this Privacy Policy is formulated, and the following reminder is provided to you:

Privacy Policy applies to the information we collect on the Site and in email, text, and other electronic communications between you and this Site. In

particular, this Privacy Policy does not apply to services provided to you by any third party, and such services shall be subject to a privacy policy that is otherwise specified to you.

Before using our Service, please read carefully and thoroughly understand Privacy Policy. Make sure you fully understand and agree to it before using our products or services.

## **2. ACCEPTANCE OF THIS PRIVACY POLICY**

By accessing or using this Site or Company Services, you signify acceptance to the terms of this Privacy Policy.

## **3. PERSONAL INFORMATION WE COLLECT**

Personal information is individually identifiable information, namely information that identifies an individual or may enable the identification of an individual, or may be of private or sensitive nature information relating to an identified or identifiable natural person. Identification of an individual also includes the association of such an individual with a persistent identifier such as a name, an identification number, a persistent cookie identifier, etc.

Personal information does not include information that has been anonymized or aggregated so that it can no longer be used to identify a specific natural person.

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. This includes information you provide to us, information that is collected about you automatically, and information we obtain from third parties.

### **Information you provide to us**

To establish an account and access our Services, we'll ask you to provide us with some important information about yourself. This information is either required by law (e.g., to verify your identity), necessary to provide the requested services, or is relevant for certain specified purposes, described

in greater detail below. As we add new features and Services, you may be asked to provide additional information.

We may collect the following information that you provide to us:

- Your name, email, crypto wallet address when you register our Services;
- Transaction data authorized by you designated for broadcast by means of our services, DAO (Decentralized Autonomous Organisation) voting history;
- Information about the DAO that you created on the Site;
- Information you provide by sending us an email, contacting us with a messenger, forms, or otherwise voluntarily providing us with your Personal Data. Such information may include your name, date of birth, address, email address, telephone number, identifying documents, geographic location, personal description, photograph, bank details, and other information obtained from your communications.

### **Information we collect from you automatically**

To the extent permitted under the applicable law, we may collect certain information automatically, such as whenever you interact with the Sites or use the Services. This information helps us address customer support issues, improve the performance of our Sites and Services, provide you with a streamlined and personalized experience, and protect your account from fraud by detecting unauthorized access. Information collected automatically includes:

- **Automatic Data Collection.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with and the communities that you join, the frequency and duration of your activities, and other information

about how you use our Services. In addition, we may collect information that other people provide about you when they use our Services, including information about you when they tag you.

- Cookies, Pixel Tags/Web Beacons, and Other Technologies. We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through your use of our Services.

We may also use identifiers to recognize you when you access our Sites via an external link, such as a link appearing on a third-party site.

### **Information we collect from our affiliates and third parties**

From time to time, we may obtain information about you from our affiliates or third-party sources as required or permitted by applicable law.

We may analyze public blockchain data, your cryptocurrency wallet data, or your public information from social networks to ensure parties utilizing our Services are not engaged in illegal or prohibited activity under our Terms and to analyze transaction trends for research, development, and Services improvement purposes.

The categories of personal information we may collect about you from other sources include your name or username, contact information, information pertaining to your public blockchain address (e.g., address, balance, available assets, transactions history, information about smart contracts, interactions with other address owners, and similar statistics), information about your interest and involvement in cryptocurrencies, and analytics data regarding your interaction with, or response to, communications sent to you on behalf of our customers.

We may also receive information that you provide to third parties when using the Superdao Service (i.e., an online payment service or an organization that provides user verification).

## **4. THE REASONS OF USING YOUR PERSONAL INFORMATION**

We are going to use your personal information for the following purposes:

## **Provision of our Services to you**

- to fulfill the obligations under contracts signed with you, as well as to provide you with the information, products, and Services that you requested;
- to ensure the security of our Services and your Account;
- for the administration of our Site and for internal operations, including troubleshooting, data analysis, testing, statistical data collection, and for conducting surveys;
- to support, respond and resolve your complaints and issues related to the use of our Services and the capabilities of our Site;
- to provide relevant marketing, as well as to communicate with you by providing you with information about our events, seminars, or services, including conferences or educational events, that may be interesting to you. This processing is necessary for our legitimate interest to send you tailored marketing messages, client newsletters, and invitations.

## **Provision of our Services to third-party customers**

We use your information to provide our Services to third-party customers, such as:

- Collecting information about your interest and involvement in blockchain protocols, cryptocurrencies, and other web3 technologies;
- Assessing your possible interest in products or services provided by our customers;
- Communicating with you on behalf of our customers;
- Analyzing your interaction with, or response to, customer communications.

## **Marketing and advertising our Services**

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some ways we market to you include email campaigns, custom audiences advertising, airdrops, and content marketing on behalf of our customers on

third-party platforms, such as Discord, etc., including through cross-device tracking.

If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in the Section 17 of this Privacy Policy.

## **Data analysis**

Our website pages and emails may contain web beacons or pixel tags or any other similar types of data analysis tools that allow us to track the receipt of correspondence and count the number of users that have visited our webpage or opened our correspondence. We may aggregate your personal information with the personal information of our other clients on an anonymous basis (that is, with your personal identifiers removed) so that more rigorous statistical analysis of general patterns may lead us to provide better products and services.

If your personal information is completely anonymized, we do not require a legal basis, as the information will no longer constitute personal information. If your personal information is not in an anonymized form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

## **5. LEGAL GROUNDS FOR THE PROCESSING OF YOUR PERSONAL DATA**

We may process your personal information on several legal grounds, depending on the specific purpose for which we use your information:

### **Execution of the contract**

In the event that the processing of your personal information is necessary to fulfill the obligations under contracts signed with you or third-party customers, as well as to provide you with the information, products, and Services that you requested.

## **Legal obligation or public interest**

In the event that we need to process your personal information in accordance with legal obligations.

The purposes of processing include the control of identity verification, the prevention of money laundering and fraud, risk control measures, and the provision of information to a competent authority, public authority, or law enforcement agency.

## **Legitimate interests**

Where necessary, we may process your personal information where we or a third party have a legitimate interest in pursuing commercial and business interests unless such interests are overridden by your interests, fundamental rights, and freedoms.

## **Services Optimization**

In order to optimize your user experience, we may use your personal information to operate, maintain, and improve our Services. We may also use your information to respond to your comments and questions regarding the Services, and to provide you and other users with general customer service.

## **Your consent**

In certain circumstances, we may, based on your contact details, ask you for specific permission to process personal information for specific purposes.

Your information will be processed in this way if you consent to it. If the legal basis is the consent you have given, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of the data processed prior to the withdrawal.

## **6. DISCLOSURE OF YOUR PERSONAL INFORMATION**

We disclose your information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in

the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

### **Disclosures to provide our Services**

We may share your personal information with our third-party customers to provide our Services to them.

We may share your personal information with our third-party service providers, who use that information to help us provide our Services. This includes service providers that provide us with IT support, hosting, payment processing, customer service, and related services.

We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information to business partners with whom we jointly offer products or services.

We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for the purposes of delivering personalized advertisements to you when you visit digital properties within their networks.

For forms operated or connected with the Superdao platform, the information is used as follows: the information is received by campaign organizers through the CRM view at Superdao with the email added to the Superdao marketing database and can be used for transactional, promotional, and digest communications from Superdao. First-party communication from Superdao and the form content is recorded to the CRM view of individual campaign organizers for the given form and not shared with other third parties.

### **Disclosures to protect us or others**



We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

### **Disclosures in the event of merger, sale, or other asset transfers**

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

## **7. SECURITY OF PERSONAL INFORMATION**

We have implemented security measures to ensure the confidentiality of your personal information and to protect it from loss, misuse, alteration, or destruction. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We have taken appropriate safeguards to require that your personal information will remain protected and require our third-party service providers and partners to have appropriate safeguards as well. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

We may transfer personal information outside the United States of America. In those cases, we will ensure that it is protected and transferred in a manner consistent with the legal requirements applicable to the information.

## 8. YOUR RIGHTS

Under certain conditions, by contacting us, you can use the following rights:

- the right to delete your personal information (all or part thereof, except blockchain storages);
- the right to change or correct your personal information, in particular when it is incorrectly stated;
- the right to object to us using your personal information for a particular purpose or purposes or restrict processing of your personal information;
- the right to access your personal information;
- the right to withdraw consent to our processing or (and) controlling your personal information.

If you would like to exercise any of these rights, please contact us as set forth in the Section 17 of this Privacy Policy. We will process such requests in accordance with applicable laws.

Please note that the implementation of some of your rights, depending on the situation, may limit, complicate or completely exclude the possibility of further cooperation with us.

Your exercise of these rights is subject to certain exceptions to protect the public interest (such as preventing or detecting crime) and our interests (such as maintaining legal privileges).

Notwithstanding the above, we cannot edit or delete any information that is stored on a blockchain, as we do not have custody or control over any blockchains. The information stored on the blockchain may include purchases, sales, and transfers related to your blockchain address and NFTs held at that address.

Our Site may contain active links from/to the websites of our partners and advertisers. If you are following an active link, please note that other websites have their own privacy policies, and we are not responsible for the provisions of these policies. Please review the privacy policies of these websites before sharing your Personal Information with them.

## **9. RIGHTS OF USERS FROM THE EU AND UK**

“GDPR” means the European Union General Data Protection Regulation (EU) 2016/679, and the UK version. Information that you provide may be transferred or accessed by entities around the world as described in this Privacy Policy. If you are located outside the United States, you understand that we may transfer personal information to and process it in the United States. If you are located in the EU or the UK, you freely consent to the transfer of personal information outside of the EU and the UK. Your consent to this Privacy Policy constitutes your agreement to these transfers.

### **Data Controller**

For the purposes of this Privacy Policy, Superdao Inc. is the Data Controller of your personal information.

### **Rights of the EU and the UK Residents**

If you are accessing or using the Services from within the EU or the UK, you may have the following rights under the GDPR (as well as other rights). If you wish to exercise any of these rights, you may do so by contacting us as provided in this Privacy Policy.

- **Right of Access:** You have the right to obtain confirmation from us as to whether or not we process personal information from you, and you also have the right to at any time obtain access to your personal information stored by us.
- **Right to Correction of your personal information:** If we process your personal information, we use reasonable measures to ensure that your personal information is accurate and up-to-date for the purposes for which your personal information was collected. If your personal information is inaccurate or incomplete, you have the right to require us to correct it.
- **Right to Deletion of your personal information or Right to Restriction of Processing:** You may have the right to require us to delete your personal information or to restrict the processing of your personal information.
- **Right to Withdraw your Consent:** If you have given your consent to the processing of your personal information, you have the right to

withdraw your consent at any time without affecting the lawfulness of processing based on the consent before the withdrawal.

- **Right to Data Portability:** You may have the right to receive the personal information concerning you and which you have provided to us in a structured, commonly used, and machine-readable format or to transmit this data to another controller.
- **Right to Object:** You may have the right to object to the processing of your personal information as further specified in this Privacy Policy.
- **Right to Lodge a Complaint with Supervisory Authority:** You have the right to lodge a complaint with a data protection supervisory authority located in the European Union or the UK. Further information about how to contact your local data protection authority is available at the website of the European Commission.

If you would like to exercise any of these rights, please contact us as set forth in the Section 17 of this Privacy Policy. We will process such requests in accordance with applicable laws.

## **10. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS**

This Supplemental California Privacy Notice only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“CCPA”). The CCPA provides California residents with the right to know what categories of personal information we have collected about them and whether we disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months.

For more details about the personal information we collect from you, please see the Section 3 “PERSONAL INFORMATION WE COLLECT” above. We collect this information for the business and commercial purposes described in the Section 4 “THE REASONS OF USING YOUR PERSONAL INFORMATION” above. We share this information with the categories of third parties described in the Section 6 “DISCLOSURE OF YOUR PERSONAL INFORMATION” above.

For purposes of the CCPA, we do not “sell” the personal information of minors under 18 years of age.

Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of personal information we collect (including how we use and disclose this information), to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us by email at [business@superdao.co](mailto:business@superdao.co). Please note that you must verify your identity and request before further action is taken. As a part of this process, government identification may be required. Consistent with California law, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester’s valid government issued identification, and the authorized agent’s valid government issued identification.

## **11. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS**

If you are a resident of Nevada, you have the right to opt out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting us at [business@superdao.co](mailto:business@superdao.co) with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. If you have any questions, please contact us as set forth below.

## **12. RETENTION OF PERSONAL DATA**

Making sure your personal information is safe and secured is of the highest priority to us. We use secure storage facilities ensuring the safeguard of your personal information you share with us at all stages of interaction with our Site using our products and Services. All appropriate measures to secure your personal information from potential hacking attacks, loss, or misuse are implemented by our security team.

We will hold your personal information only for the duration of you using our products and Services via your account, having regard to the purposes

described in this Privacy Policy as well as legal and regulatory obligations that we comply with.

Unless otherwise provided by law, you agree that we have the right, but are not required to, retain all personal information collected for the duration of your use of our Services and for the period required by law, but no longer than 5 (five) years. The storage period may be extended for a period not exceeding 1 (one) year if there is a reasoned request from the competent authority.

The Company will retain your personal information for the duration of your contractual relationship with the Company and, to the extent possible, after the termination of that relationship, for as long as necessary to fulfill the purposes set out in this Privacy Policy.

We may access your personal information or retain it for a longer period if it will be subject to an official request or legal obligation, an investigation by governmental bodies or investigation into possible violations of our Terms of Use and its essential parts, or in other cases to prevent potential harm based on our reasonable considerations.

### **13. CHILDREN'S INFORMATION**

To register a Site account, use our Site and/or Services, and accept the terms of this Privacy Policy, you must be over the age of eighteen (18) (or other age as required by local law). Without relieving you of your responsibility to comply with the terms hereof, we reserve the right (without obligation) to request proof of age at any stage so that we can verify that minors under the age of eighteen (18) are not using our Site without their parent or legal guardian consent.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in the Section 17 of this Privacy Policy. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected unless we have a legal obligation to keep it and terminate the child's account.

## **14. THIRD-PARTY SITES**

While using the Site, you may encounter links to third-party websites and/or services. Please be advised that such third-party websites and/or services are independent from us and may use cookies and other web-tracking technologies, not specified or otherwise handled in our Privacy Policy, to collect non-personal and/or personal information about you. We assume no responsibility or liability whatsoever with regard to privacy matters or any other legal matter with respect to such third-party websites and/or services. We encourage you to carefully read the privacy policies and the terms of use of such third-party websites and/or services, as their terms, not ours, will apply to any of your interactions with such third parties. We have no control over using any information you provide to these third-party services.

## **15. UPDATES TO THIS PRIVACY POLICY**

Any changes we may make to our Privacy Policy in the future will be posted on this page. By continuing to use the Superdao service, you agree to the changes made, so we encourage you to check this page frequently to be aware of any updates or changes to the Privacy Policy.

## **16. MISCELLANEOUS PROVISIONS**

This Privacy Policy, its interpretation, and any claims and disputes related hereto, shall be governed by the laws of the State of Delaware, USA.

This Privacy Policy was written in English and may be translated into other languages for your convenience. If a translated (non-English) version of this Privacy Policy conflicts in any way with the English version, the provisions of the English version shall prevail.

## **17. CONTACT US**

If you choose to use our Services, your use and any dispute over privacy are subject to this Privacy Policy and our Terms of Use. If you have any concerns about privacy at Superdao, please contact us by email at [business@superdao.co](mailto:business@superdao.co).

