

## PRIVACY DATA PROTECTION POLICY

This information is provided pursuant to the European Regulation for the protection of personal data n. 679/2016 and Legislative Decree no. 196/2003, Code regarding the protection of personal data, in the parts not expressly repealed by Legislative Decree no. 101/2018, to those who provide their personal data through this website. The information is not made instead for the sites possibly consulted through the links on the site.

### 1. DEFINITIONS

In relation to the terms used in this privacy policy, it must be understood:

- **Platform:** the web platform managed by Vanilla Rocket s.r.l. which provides an information society service consisting, among others, in offering Registered Users the possibility of generating Bitmonds, as well as enjoying a shared advertising space for the presentation of their Bitmonds to other Registered Users and registering the passage owned on the Ethereum blockchain;
- **Vanilla Rocket Srl:** Vanilla Rocket s.r.l. based in Bussero, Via Aldo Moro n. 19, P.I 10393410963 e-mail info@bitmonds.com, PEC vanillarocket@pec.it; the legal person who manages the Platform, the domains and subdomains, as well as the owner of the same, of the Services and Content provided through them; the manager and / or owner of the IT infrastructure and not to support it; the owner of the "Bitmonds" brand; the Data Controller.
- **Bitmonds:** the collectable intangible digital asset (s) whose three-dimensional graphic representation is that of a diamond generated by the Registered User through the Platform;
- **Product (s):** the Bitmonds (s) created or exchanged through the Site.
- **Service / s:** the set of activities and operations that Registered Users can perform through the Site; the activity of generating Bitmonds through the site, the granting of advertising space on the Site for the promotion of the exchange of Bitmonds between Registered Users, the registration of the transfer of ownership between Registered User and Vanilla Rocket Srl, as well as between Registered Users, on the blockchain Ethereum. There is no service intended for bargaining between Registered Users for the sale and purchase of Bitmonds.
- **Contract or Sales Contract:** the remote contract concerning the sale of the Products and Services between the Buyer and Vanilla Rocket Srl, as part of an organized electronic commerce service that uses remote communication technology called the Internet.
- **Site:** the website identified by the www.bitmonds.com domain and all its subdomains;
- **User:** the user of the site and the services provided through it. The interested party to the processing of personal data;
- **Registered User:** users natural persons who have registered their data on the Platform and who have their own Profile available to them under license;
- **Profile:** the reserved area univocally attributable in general to a Registered User; the digital environment with customizable contents and functionalities, isolated from other users, licensed together with a unique password and username chosen by the Registered User and assigned to the same.

### 2. HOLDER OF THE DATA PROCESSING

The Data Controller is Vanilla Rocket s.r.l. based in Bussero, Via Aldo Moro n. 19, P.I 10393410963 e-mail info@bitmonds.com, PEC vanillarocket@pec.it. Contact us whenever you want, we will be happy to answer all your questions.

### 3. LEGAL BASIS OF THE PROCESSING

- The legal basis for the processing of your personal data if you decide to register on the Site is consent.
- The legal basis for the processing of your personal data if you decide to purchase the Products and Services offered by Vanilla Rocket through the Site is the execution of the contract of which you are a part and the consequent legal obligations of which we are burdened;
- The legal basis if you decide to exchange your Bitmonds with another Registered User is your consent;
- The legal basis if you decide to subscribe to the newsletter service is your consent;
- The legal basis if you decide to receive personalized advertising or marketing communications is your consent.

Remember that you can always revoke your consent, where possible, through the appropriate section within your Profile.

#### **4. DATA PROCESSED**

##### **4.1 TECHNICAL DATA**

While browsing the site, data of different nature may be collected, some of which will be acquired automatically, while others only with your consent. Specifically, the data collected through browsing the website are as follows:

- IP address (internet protocol)
- Date and time of visit
- Browser used
- the addresses in notation of the requested resources
- Cookies

The acquisition of technical data is implicit in the functioning of the Site itself and never involves your identification.

##### **4.2 PERSONAL DATA**

The personal data we process are as follows:

###### **4.2.1 Personal data for the creation of the Profile**

- Email address
- Password to access the Profile

###### **4.2.2. Personal data for the use of the Service**

- First name
- Surname
- Date of birth
- City of residence
- Personal code (User ID)
- User Hash code
- Sex
- Photographic portrait of your face (optional)

We may also become aware of other personal data (number and type of identification document, data contained in the identification document, etc.) if the activities you carry out make it necessary to strongly identify your person through the KYC procedure - Know your customer.

###### **4.2.3 Personal data for the newsletter service**

- Email address

#### **5. PURPOSE OF THE TREATMENT**

The collected data will be used for the following purposes:

1. allow you to receive the information, written or verbal, that you have requested from us;
2. allow you to use the Platform;
3. allow us to assist you remotely for the use of our Service;
4. allow you to create Bitmonds, exchange them and use the Service offered by Vanilla Rocket s.r.l. ;
5. allow Vanilla Rocket to fulfill the contract (s) relating to the Service purchased;
6. allow you to advertise your Bitmonds;
7. allow you to contact another Registered User;
8. record the changes of ownership of Bitmonds on the Ethereum blockchain;
9. carry out advertising, commercial and marketing activities;

10. perform statistical analysis anonymously;
11. allow you to receive our newsletter;
12. defend our rights as Data Controllers.

## **6. NATURE OF PROVIDING**

The provision of your personal data is mandatory for the creation of the Profile and for the use of the Service. Failure to provide the data will not allow you to conclude the contract with us or with another Registered User. In all other cases, the provision of your personal data is optional.

## **7. STORAGE PERIOD OF PERSONAL DATA**

Your personal data will be kept for the time necessary for the purposes pursued, for the fulfillment of the contract of which you are a part and for fulfilling the legal obligations incumbent on us.

We would like to clarify to you that the storage time has been established with criteria.

Except for legal obligations or our legitimate interest, we undertake not to process your data beyond the following times:

### **7.1 Personal data for the creation of the Profile**

- if you purchased the Service: 10 years from the last access to the Platform
- if you have never purchased any Service: 5 years from the last access to the Platform

### **7.2 Personal data for the use of the Service**

- if you purchased the Service: 10 years from the last access to the Platform
- if you have not purchased any Service: 5 years from the last access to the Platform

However, you must know that your HASH code, identifying your person, will be registered on the Ethereum blockchain and therefore, this data will be processed for an unspecified time.

### **7.3 Personal data for the newsletter service only**

5 years from the day of the registration request.

## **8. PLACE OF TREATMENT**

Your personal data are processed at our office, but could be transferred for technical purposes also to different subjects, appointed as data processors, based in Italy or in any case within the European Union. You can contact us whenever you want to get all the information related to this transfer and to the responsible subjects.

However, you must know that your HASH code, identifying your person, will be registered on the Ethereum blockchain and therefore, this data can also be processed in other places.

## **9. PROCESSING METHODS**

The data processing takes place through the use of electronic tools. Occasionally and only if necessary, the data will also be processed on paper. The data provided and other data communicated and referable to third parties will be:

- processed in a lawful and correct manner;
- collected and recorded for specific, explicit and legitimate purposes, and used in other processing operations in terms compatible with these purposes;
- correct or, in any case, corresponding to the information provided to us;
- relevant, complete and not excessive in relation to the purposes for which they are collected or subsequently processed;
- stored in a form that allows identification of the interested party for a period of time not exceeding that necessary for the purposes for which they were collected or subsequently processed.

## **10. COMMUNICATION OF PERSONAL DATA**

The personal data you have provided us for the creation of the Profile and for the purchase of the Service may only be disclosed to qualified third parties, if necessary appointed as data processors, and only where necessary for the performance of the services requested, for the fulfillment of the contract you are part of or to fulfill legal obligations, with a guarantee of protection of your rights and in compliance with the European Regulation and the Privacy Code.

We may also need to communicate your data to comply with legal or regulatory provisions.

In particular, your data may be disclosed to the following categories of people:

- persons, entities or authorities to whom the communication of your personal data is mandatory pursuant to provisions of law or regulation;
- persons, companies or professional firms that provide assistance and advice to the Data Controller in accounting, administrative, tax, tax, legal matters;
- individuals, natural or legal, that you have identified as recipients of your digital heritage or against whom we must perform the assignment you have given us;
- persons, companies or professional firms that provide instrumental and / or necessary activities for the provision of the Services provided through the Site, such as the payment service manager or the user strong identification service manager (KYC procedure - Know your customer ).
- natural persons authorized by Vanilla Rocket Srl who have committed themselves to confidentiality or have an adequate legal obligation of confidentiality (eg employees and collaborators);

Your e-mail address can then be communicated to another Registered User if he intends to contact you to negotiate or perfect the transfer of ownership of Bitmonds.

## **11. DISCLOSURE OF PERSONAL DATA**

Your personal data will not be disclosed, with the exception of the identification code that will be registered on the Ethereum blockchain on the occasion of each transaction.

Your identification code and the "Blockchain HASH" code will also be disseminated through the page ("Catalog") intended for the advertising of Bitmonds.

## **12. TRANSFER OF DATA ABROAD**

Your personal data will not be transferred outside the European Union nor is it the intention of the Data Controller to transfer them with the exception of the identification code referable to your person and the "Blockchain HASH" code that will be generated following registration on the Ethereum blockchain on the occasion of each transaction.

However, your use of the social plugins provided by Facebook, Instagram and Youtube itself will involve the sharing of some data collected with the respective companies supplying the Package. For the transfer of such data, the consent of the interested party will not be necessary pursuant to the provisions of the Italian and European authorities (Decision n. 1250/2016 - Privacy Shield).

## **13. RIGHTS OF THE INTERESTED PARTY**

We remind you that you have the right at any time to:

- ask us to confirm whether or not personal data relating to you is being processed and to obtain access to such data, in addition to all information relating to the processing;
- receive a copy of the personal data being processed;
- correct incorrect data or supplement incomplete data;
- request the deletion of your personal data, if the conditions exist;

- request the limitation of the processing of your personal data, if the conditions are met;
- request and obtain - in cases where the legal basis of the processing is the contract or consent, and the same is carried out by automated means - personal data in a structured and readable format by automatic device, also for the purpose of communicating such data to another data controller (so-called right to portability of personal data);
- object at any time to the processing of personal data when particular situations occur;
- withdraw consent to the processing of data at any time, limited to the cases in which the treatment is based on consent for one or more specific purposes. The processing carried out prior to the withdrawal of consent, however, retains its lawfulness.

Requests should be addressed to the Owner Vanilla Rocket s.r.l. based in Bussero, Via Aldo Moro n. 19, P.I 10393410963 e-mail [info@bitmonds.com](mailto:info@bitmonds.com), PEC [vanillarocket@pec.it](mailto:vanillarocket@pec.it).

#### **14. FACULTY TO PROHIBIT THE HOLDER OF THE EXERCISE OF RIGHTS BY INTERESTED THIRD PARTIES**

In relation to your rights, you must also know that:

- your rights, upon your death, may be exercised by all those who have their own interest, or act for your protection, as your authorized representative, or for family reasons worthy of protection;
- however, if you do not want this to happen, you must expressly prohibit it with a written declaration (also by e-mail). Please note that you can also prohibit the exercise of some of your rights only. Remember then that you can always change your mind and lift the ban that imposed us;
- in any case, keep in mind that the prohibition cannot produce detrimental effects for the exercise by third parties of the property rights deriving from your death, as well as the right to defend your interests in court.

#### **15. RIGHT OF CLAIM TO THE GUARANTOR AUTHORITY**

We remind you that you always have the right to complain to the Guarantor Authority for the protection of personal data.

### **COOKIES POLICY**

During navigation, technical data will be collected automatically, such as: IP address (internet protocol), Date and time of visit, Browser used, Number and position of the clicks made, the physical address of the device from which the connection is made (so-called MAC Address), the addresses in notation of the requested resources, cookies. The collection of technical data is implicit in the functioning of the website itself and never involves identification of the interested party.

#### **Cookies**

Among the technical data there are also "Cookies", small files that the site, or a third party site, sends to the interested party's terminal where they are stored and then retransmitted to the same sites when necessary. The site uses the following types of cookies:

Technical cookies: they are anonymous cookies whose acquisition is necessary to allow the interested party to browse the site and use all its features. Their presence also allows for faster and faster browsing and use of the web, because for example they intervene to facilitate certain procedures when making online purchases, when authenticating in restricted access areas or when a website automatically recognizes the favourite language.

Specifically, the technical cookies used are:

- Cookies di funzionalità o preferenza (sono quelli che consentono di memorizzare le scelte di funzionalità preselezionate dall'interessato, ad esempio quelle di lingua o area geografica)
- Cookies di navigazione (sono quelli che garantiscono la normale navigazione e fruizione del sito web)

Technical cookies will be available for automatic deletion by the browser according to the methods provided by the same.

Pro-filiation cookies: these are non-anonymous cookies whose acquisition is necessary for recording the activity carried out by the user on the website in order to collect information on the website's query times, on the choices made and, in general, on behavior while browsing. Specifically, profiling cookies are used, provided by the following services. Please refer to the respective privacy policies for the related information:

- - Google Doubleclick: <https://policies.google.com/technologies/ads?hl=it-IT>
- - Facebook: <https://www.facebook.com/policy.php>
- - Youtube: <https://policies.google.com/technologies/ads?hl=it-IT>

For any further information, see our extended information on the processing of your personal data.