

PRIVACY POLICY OF GREENART COIN

Last Updated: February 23, 2024

Welcome to Greenart Coin!

Greenart Coin Ltd is headquartered in London, United Kingdom. We conduct online operations worldwide that help to create and provide some of users' favorite products and services, including the GAC token, our NFT platform, a dedicated app, and, coming soon, a video game.

This Privacy Policy describes the various ways we may collect, use, and share information about, through, or in connection with the Greenart Coin Services (see "What are Greenart Coin Services?" below). If you have any questions, you can always contact us as described below in the "Contact" section.

When we refer to "Greenart Coin" (or similar terms, such as "we" or "us") in this Privacy Policy, we mean the entity of Greenart Coin that controls and is responsible for user data, including Greenart Coin Ltd and its affiliates that contribute to providing and supporting the Greenart Coin Services. You can also find details about the data controller for the personal data we collect through the various Greenart Coin Services in the section "Contact" below.

1. WHAT ARE GREENART COIN SERVICES?

We use the term "Greenart Coin Services" to describe any Greenart Coin products or services that directly connect to this Privacy Policy. These include, for example: the Greenart Coin (GAC) token (also through our partner Bancor Trust Asset Management sro); websites and applications such as www.greenartcoin.eu, greenartcoin.eu/marketplace, as well as <https://app.greenartcoin.eu/staking>;

Please note that the use of Greenart Coin Services may also be subject to additional terms and conditions. Please read the entire Privacy Policy. Before using such products or services, you will also need to carefully review any other applicable agreement for the Greenart Coin Services used, as well as confirm that you have understood and accepted it.

2. WHAT DATA DO WE COLLECT?

The type of data we collect depends on how you interact with us. In general, we collect data in three main ways: A) When you provide it to us, B) automatically when you use Greenart Coin Services, and C) from service providers and third parties.

A. User-provided Data

You may provide us with various types of data depending on how you interact with Greenart Coin Services. Sometimes, we will ask you to provide specific information, such as when we need it to provide you with parts of Greenart Coin Services (e.g., asking you to provide your date of birth or complete an online registration process). If we ask you to provide us with information in such cases and you choose not to do so, you may not be able to access the relevant Greenart Coin Services, and/or some features may not work as expected. For example, to make purchases on the Greenart Coin marketplace and to use the app, you need a Greenart Coin account. To create one, you will need to provide us with basic registration information, such as your name, a publicly displayed name, a password, the country you live in, and your email address. If you wish to make a purchase, we may ask you to provide payment information (such as credit card number and expiration date) to complete the transaction. Additionally, many of our services require your date of birth to determine what features we can offer you and what settings to apply to your account based on your age and location. We also collect data that you voluntarily provide to us to subscribe to email notifications, use social features like forums or chat, gain early access to our games, enable two-factor authentication, register for participating in our events, respond to surveys, or contact us through customer service inquiries. If you participate in a contest or competitive event, we will collect the data from your application and any other information we may need to confirm your eligibility and process payments. We collect any information you choose to provide us in these or similar cases.

B. Automatically Collected Data

We automatically collect certain data when you visit, access, or use Greenart Coin Services. This includes information about your use of the application, purchases, rights, and other activities in Greenart Coin Services, typically associated with your account (if you are logged into your Greenart Coin account or use a third-party

account to access Greenart Coin Services) or an identifier we have assigned to your device or profile. While the specific types of data we automatically collect may vary, they generally include: usage information and statistics on how you interact with Greenart Coin Services, saved preferences, reports of abnormal stops, URLs of our websites you have visited, referral and exit page URLs, page views, time spent on a page, number of clicks, and platform type. Technical information about the computer, device, hardware, or software you use to access our services, such as IP address, device identifiers, internet service provider plugins, or other device identification or transactional information (such as device brand and model, device operating system and browser information, or other device or system-related specifications) and your device's general location, typically derived from your device's IP address. Greenart Coin Services use technologies such as cookies, log files, and web beacons to automatically collect the types of data listed above. Some of these technologies may create small files or recording tools that can be stored on your device. They help us, our service providers, and third parties recognize your device and provide information about how you use and interact with Greenart Coin Services. For example, they support our ability to authenticate users, remember preferences, manage advertising, personalize experiences, and conduct data analysis. We want to inform you that some features of Greenart Coin Services are provided by third parties, who may also use automated data collection processes and record information about the use of Greenart Coin Services, their services, or other websites over time. For example, when you use Greenart Coin Services that include payment gateways, such third-party providers may collect information through their technology. These features are subject to the privacy policies of such third parties.

C.Data Collected from Other Sources

In some cases, we may also receive data about you from service providers and third parties in connection with your use of Greenart Coin Services or your interactions with us on other platforms. For example, some other developers allow you to use your Greenart Coin account to access their service. And if you choose to link your Greenart Coin account with your account on third-party social media platforms, platforms, or other similar websites or services, or if you interact with an advertisement for one of the Greenart Coin Services on an external website or service, the company

operating such website or service may share some information with Greenart Coin, in accordance with that company's privacy practices. Your privacy settings on that other company's website or service generally govern the specific types of data that can be shared with Greenart Coin, so you should make sure to regularly review and update those settings. Common examples of shared data for linked accounts may include the displayed name and user ID of the third-party account, as well as device data and associated device name, and email address. You may also purchase, download, or access some Greenart Coin Services on or through third-party managed services. In such cases, they may provide us with information to facilitate access to and use of Greenart Coin Services. This typically includes data such as displayed name, user ID, and device and region information. In this case, the company operating the platform or service may share with us some information that contributes to purposes such as user rights.

D. Fraud and Deception Prevention

Providing users with a good, balanced, and competitive experience on Greenart Coin Services is extremely important to us. We strictly prohibit deceiving, hacking, account theft, and any other unauthorized or fraudulent activities on Greenart Coin Services. We use a variety of anti-fraud and fraud prevention technologies to help identify and prevent harmful activities. These services may collect and analyze data about the user's computer and the software installed on the user's computer in order to detect fraud and may be provided by Greenart Coin or service providers.

3. HOW DO WE USE THE DATA?

In general, we use the data we collect (individually or in combination with other data collected as described in this Privacy Policy) to help provide, improve, personalize, analyze, and promote Greenart Coin Services. The foregoing includes use for purposes such as:

- Creating, verifying, and managing user accounts and features.
- Providing Greenart Coin Services, as well as related support and assistance, including responding to information requests, processing transactions or

requests, and communicating with users (e.g., sending messages and service and account updates).

- Developing, delivering, and improving Greenart Coin Services and other offerings, some of which may be provided in collaboration with other parties.
- Personalizing the user experience, including by presenting content or features that are most suitable for the user or their interests or our deductions about their interests.
- Promoting Greenart Coin Services, including managing, customizing, and measuring the effectiveness of our advertisements, promotional offers, surveys, and events.
- Managing alpha, beta, or early access tests (and collecting feedback).
- Conducting data analytics (e.g., analyzing how Greenart Coin Services are used to better understand, improve, and personalize them).
- Fulfilling our legal or contractual obligations and enforcing our terms.
- Securing Greenart Coin Services, including, among other things, fraud detection and other types of protection of Greenart Coin and other users from illegal or harmful actions.

We may also process data that does not identify you as such, including aggregated or anonymized data created or collected by us or other sources. Such data helps us better understand larger user groups. If we combine such data with user-identifying data, we will treat it as described in this Privacy Policy. However, you should be aware that the Privacy Policy does not limit our ability to process data that does not identify you, and we may use and disclose aggregated or anonymized data for any purpose permitted by law.

4. HOW DO WE SHARE THE DATA?

We may share some of the data we collect to help operate and improve Greenart Coin Services. Depending on how you interact with us, common examples may include sharing:

- With distributor partners (e.g., to comply with regulatory obligations).

- With other software developers (e.g., to enable features that you purchase through the Greenart Coin app).
- With other users (if you use social features).
- With the public (e.g., your displayed name, in the case of attribution or prize winnings related to public initiatives, as proof of winner identification)
- With service providers operating on our behalf to assist with Greenart Coin Services support in accordance with our instructions (e.g., cloud storage providers, payment processors, or marketing and advertising partners).
- With Greenart Coin or others when we believe it is necessary to share data to comply with the law or protect you (e.g., in response to a court order or injunction, as part of an investigation into fraud or other illegal activity, or the violation of our terms or policies, or where necessary to protect others from death or serious harm to people or property).
- In connection with certain types of extraordinary corporate transactions (such as in the case of a restructuring)
- We may also share data that does not identify you with third parties, including aggregated or anonymized data.

Mobile phone numbers provided to Greenart Coin for security reasons will not be shared with third parties or affiliates for marketing/promotional purposes. Third parties you interact with through the Greenart Coin Services may have privacy practices that differ from those of Greenart Coin, so please review your privacy policies before sharing your data with those third parties.

5. MINORS' PRIVACY

We design Greenart Coin Services to welcome users of all ages worldwide. This means we collect age information from users, and some of our services will provide a different experience based on what we know about a user's age and where they live. The information below allows parents and guardians to understand our privacy practices regarding minors (under 16 years of age or the digital consent age in the user's region, whichever is higher).

When a user indicates they are a minor, they are placed in a "Limited Account" until they are no longer a minor as defined above or until the parent or guardian provides

further privacy authorization and enables parental controls. Limited Accounts can view Greenart Coin services, but functions such as real-money purchases are disabled. Greenart Coin collects limited personal data from Limited Accounts to manage them, in each case in accordance with applicable privacy and youth protection laws:

- Date of birth and country to determine age and apply appropriate settings
- Parent or guardian's email address to provide notification and request consent for additional features (which is deleted if the parent does not respond within 14 days)
- User's email address for access (which is stored only in a non-readable hashed form)
- Persistent identifiers such as IP address, gaming platform account IDs, necessary website tracking technologies, and device identifiers to provide and maintain Greenart Coin Services (including analytics to improve them), protect user security and integrity, ensure legal and regulatory compliance, and facilitate service customization.

6. USER CHOICES AND CONTROLS

We strive to provide users with meaningful choices regarding the personal data we collect. The specific options available to you often vary depending on the exact nature of the relationship you have with us, such as the Greenart Coin Services you use. Common examples include:

- You can request access, correction, or deletion of personal data we have collected from you. You can submit requests for access, modification, or deletion of personal data associated with your Greenart Coin account by contacting us as described in the "Contact" section. Please note that we may ask for additional information to help verify your identity before completing your request.
- You can change your email marketing preferences at any time, for example, using the opt-out mechanism provided in our marketing emails, updating your Greenart Coin account settings, or forwarding your request to us (see the "Contact" section). You can change privacy settings on third-party websites

(such as social networks) or platforms (such as console providers) to limit the data they can share with us.

- You can change browser or mobile device settings to block, manage, delete, or limit tracking technologies such as cookies. In some cases, after blocking or disabling cookies, Greenart Coin Services may not function as expected, and some features may not be available.
- If you are under 18 years old and have a Greenart Coin account, you can ask us to remove or anonymize some content you have provided on Greenart Coin Services. Please direct requests for help with deletion or modification of content on Greenart Coin Services as described in the "Contact" section.

Some places in the world provide individuals with specific options regarding their personal data under rights conferred by local law.

7. OUR GLOBAL OPERATIONS

Greenart Coin Ltd is based in the United Kingdom but operates globally to help provide users worldwide with a better experience on Greenart Coin Services. We have service providers and partners worldwide to support these operations in various ways. This means that Greenart Coin may process the data we collect about your use of Greenart Coin Services in locations outside your region of residence.

A. Data Transfers

When you use Greenart Coin Services, your data may be transferred or stored in the United Kingdom or other countries where we or our service providers operate. The data protection laws and regulations of these countries may differ from those of your country of residence. Where applicable, we rely on various legal mechanisms to help legitimize data transfers outside the country of collection. If permitted by local laws, by using Greenart Coin Services, you authorize Greenart Coin to process your data in any location where we operate (including the United States).

For more information on the Greenart Coin entity responsible for managing the Greenart Coin Services you use, see the "Contact" section.

B. California Residents

The California Consumer Privacy Act or "CCPA" provides California residents with certain rights regarding their personal data. If you are a California resident, you may have the right to: (1) request more information about the categories and specific personal data we collect, use, and disclose; (2) request the deletion of your personal data; (3) opt-out of the sale of your personal data; and (4) not be discriminated against for exercising these rights.

You or your authorized representative may make these requests by contacting us as described in the "Contact" section. Please note that we may ask for additional information to help verify your identity before completing your request. If we receive the request from your authorized representative, we may ask you to provide proof that you have empowered that person to make requests to exercise rights on your behalf. We will not discriminate against you if you exercise your rights under the CCPA.

We collect the following categories of personal information, as described in the CCPA:

- Identifiers (e.g., email addresses).
- Demographic information (such as age).
- Commercial information (including purchase rights or history). Internet or electronic network activity (e.g., gaming details or website usage).
- Audio, electronic, visual, or similar information (such as voice chat).
- Geolocation information (as may be inferred from your IP address or included in your billing data).
- Other "personal data" as defined by California law (such as your credit or debit card data);
- Inferences drawn from any of these categories (e.g., about the types of games you prefer based on your purchase history).

For detailed information about the data collected under each listed point and the categories of sources from which we obtained such data, please refer to the "What data do we collect?" section above. We collect personal data for the business and commercial purposes described in the "How do we use the data?" section above.

Greenart Coin does not sell or share (as those terms are defined in the CCPA) the personal data we collect. However, we disclose personal data as described in this Policy (see the "How do we share the data?" section above). In the last 12 months, we have disclosed personal data to the following categories of recipients:

- Business partners (e.g., if you ask us to share your email address with a game developer you purchase on Greenart Coin).
- Other Greenart Coin entities (such as subsidiaries that may help support certain Greenart Coin Services).
- Other users (e.g., if you use chat or social features on Greenart Coin Services).
- Service providers (as described in the "How do we share the data?" section above).
- Operating systems and platforms; and Government entities or other third parties in response to a legitimate request.

C. Residents of the European Economic Area and Switzerland

If you are located in the European Economic Area (EEA), the United Kingdom (UK), or Switzerland, you have certain rights regarding how your personal data is processed.

Data Subject Rights

You may have the right to access, correct, or delete the personal data we have collected about you through Greenart Coin Services. Additionally, you may have the right to receive a transferable copy of the personal data you have provided, as well as to object to or limit the processing of your personal data, such as for direct marketing. Where you have provided consent to the processing of data, you have the right to revoke it.

You also have the right to lodge a complaint against us by contacting the local data protection authority (if one exists in your country). However, we would appreciate the opportunity to address your concerns before resorting to the data protection authority, so we ask you to first bring your complaint to our attention.

You can refer to the "Contact" section below for further information on how to contact Greenart Coin regarding any relevant issues. You can find more details

about the local data protection supervisory authority on the following pages:

EEA: https://edpb.europa.eu/about-edpb/board/members_en

UK: <https://ico.org.uk/global/contact-us/>

Switzerland: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>

Legal Bases for Processing

The legal bases on which we rely to process your personal data depend on the Greenart Coin Services you use and how you interact with them. They mainly include:

- **Contractual necessity:** We process personal data to perform the Greenart Coin Services you have requested based on our Terms of Service or other similar contractual agreements with you. For example, we process personal data to set up and maintain your account; process your purchases; authenticate users; provide user experience-related features (such as saving your preferences); monitor and analyze Greenart Coin Services; detect and prevent fraud, deception, or similar abuses; facilitate functions like cross-progression that allow you to play a game on one platform and carry over your progress to another, which may require sharing your data with external partners; and contact you regarding your account, transactions, or other updates. We also rely on the performance of a contract to manage our relationship with you, which includes responding to your support requests or general inquiries and notifying you of changes to our applicable terms or policies.
- **Legitimate interests:** We process personal data as necessary for Greenart Coin's business purposes, weighing the potential impact on your privacy rights. This includes many common purposes that you might reasonably expect, such as: communicating with you, responding to your requests or providing you with updates and information; better understanding our users and their preferences; personalizing your experience, saving your preferences, authenticating our users, and providing similar user experience functionalities; developing, delivering, and improving Greenart Coin Services and other offerings (some of which may be offered in collaboration with other parties); managing and personalizing advertising or promotional offers; managing purchases (within games); ensuring and protecting Greenart Coin Services; preventing fraud and

illegal activities; and supporting internal purposes such as data review and analysis. To support these operational purposes, we may use machine learning technologies to help identify harmful, toxic, or fraudulent content in our services. Content identified by these technologies will be subject to human review.

- Legal obligations: We process personal data when necessary to comply with legal obligations, such as responding to legitimate requests from law enforcement or other government officials in accordance with relevant legal processes or processing date of birth to facilitate compliance with applicable child protection laws.
- Consent: We process personal data when you provide your consent for us to do so. You are not obligated to provide your consent if you do not want your personal data to be processed for the requested purposes, and you may revoke your consent at any time.

Retention

Since the specific personal data we process and our reasons for doing so often vary depending on how you use Greenart Coin Services, the duration of their retention may also vary. Generally, we retain personal data for as long as we reasonably need it for the purposes described in this Policy (e.g., to fulfill our legal obligations, manage internal records, enforce our terms, and resolve disputes), unless a longer retention period is required or permitted by law.

The primary criteria we consider in determining specific retention periods often include the minimum requirements mandated by applicable law, relevant industry standards, the types of data involved (such as their sensitivity level), their relevance to potential disputes or similar proceedings (e.g., to defend against legal claims), and whether the data is necessary to prevent fraud or similar abuses of Greenart Coin Services (including enforcing bans against deception and other unauthorized behaviors). For example, if you create a Greenart Coin account, we generally retain the personal data associated with your Greenart Coin account for the time necessary to maintain your account, provide the Greenart Coin Services you requested, enforce the terms governing your use of Greenart Coin Services, and maintain appropriate records to reflect how we provide Greenart Coin Services to you.

To learn more about how to request deletion of your personal data from Greenart Coin, refer to the "User Choices and Controls" and "Data Subject Rights" sections.

8. SECURITY

We maintain administrative, technical, and physical systems adequate to protect personal data from accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use, and other unlawful forms of processing. In some circumstances, your data is available once you access a feature we offer. In such cases, it is necessary for you to safeguard the confidentiality and security of your user credentials and password to protect your data. If we become aware of unauthorized disclosure of your personal data, we will inform you as required by law and take measures to help protect your information.

9. UPDATES

We will update this Policy from time to time to reflect changes in our practices or relevant laws. When we do, we will change the date noted at the beginning of the Policy. In some cases, we may also notify you of the relevant changes via email or within Greenart Coin Services. We encourage you to review this Policy regularly to ensure you understand your relationship with Greenart Coin and the ways in which we may collect, use, and share information in connection with Greenart Coin Services.

10. CONTACTS

For questions or concerns about Greenart Coin Services (e.g., game-related issues, problems accessing your Greenart Coin account, bugs or other technical issues, payment issues, or content and rights-related problems), please contact the Support team. You can find more information on submitting support requests for products and services to:

Greenart Coin: support@greenartcoin.eu

Bancor Trust Asset Management: info@bancor-asset.com

If you would like to learn more about our privacy practices or this Policy, you can email us your inquiries about products and services to:

support@greenartcoin.eu

You can also contact us by mail by sending correspondence (addressed to "Attn: Legal Department") to Greenart Coin Ltd, located at 27 Old Gloucester Street - London, WC1N 3AX United Kingdom.