

PRIVACY POLICY

Welcome to MintUp (“MintUp”, “we”, “us”, or “our”), committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the Personal Data (as defined below) we collect, use, and share in connection with the <https://mintup.io> website, our APIs, mobile app, and any other software, tools, features, or functionalities provided on or in connection with our services, as described in our Terms of Service (collectively, the “Service”). “NFT” in this Privacy Policy means a non-fungible token or similar digital item implemented on a blockchain (such as the Avalanche or Ethereum blockchain), which uses smart contracts to link to or otherwise be associated with certain content or data.

What is a "personal data"?

The notion of personal data is defined in the General Data Protection Regulation (GDPR) as “any information relating to an identified or identifiable natural person (referred to as “data subject”)”. It covers a broad scope that includes both directly identifying data (e.g. first and last name) and indirectly identifying data (e.g. telephone number, license plate, terminal identifier, etc.).

Where they relate to natural persons, the following data are personal data: Surname, first name, pseudonym, date of birth, photos, sound recordings of voices, fixed or mobile telephone number, postal address, email address, etc...

“Personal Data” means data that allows someone to identify you individually, including, for example, your name, email address, as well as any other non-public information about you that is associated with or linked to any of the foregoing. “Anonymous Data” means data, including aggregated and de-identified data, that is not associated with or linked to your Personal Data; Anonymous Data does not, by itself, permit the identification of individual persons. We collect Personal Data and Anonymous Data as described below.

How do we collect your personal data?

When you use our Service, update your account profile, or contact us or use our forms, we may collect Personal Data from you, such as email address, first and last name, user name, and other information you provide. We also collect your blockchain address, which may become associated with Personal Data when you use our Service.

Our Service lets you store preferences like how your content is displayed, notification settings, and favorites. We may associate these choices with your ID, browser, or mobile device.

If you provide us with feedback or contact us, we will collect your name and contact information, as well as any other content included in the message.

We may also collect Personal Data at other points in our Service where you voluntarily provide it or where we state that Personal Data is being collected.

What personal data do we collect?

We undertake to collect only the data that is strictly necessary for the purposes for which it is to be used.

As you navigate through and interact with our Service, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- **Information Collected by Our Servers.** To provide our Service and make it more useful to you, we (or a third-party service provider) collect information from you, including, but not limited to, your browser type, operating system, Internet Protocol (“IP”) address, mobile device ID, blockchain address, wallet type, and date/time stamps.
- **Log Files.** As is true of most websites and applications, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamps, and clickstream data. We use this information to analyze trends, administer the Service, track users’ movements around the Service, and better tailor our Services to our users’ needs. For example, some of the information may be collected so that when you visit the Service, it will recognize you and the information can be used to personalize your experience.
- **Cookies.** Like many online services, we use cookies to collect information. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to analyze how users interact with our Service, make improvements to our product quality, and provide users with a more personalized experience.
- **How We Respond to Do Not Track Signals.** Our systems do not currently recognize “do not track” signals or other mechanisms that might enable Users to opt out of tracking on our site.
- **Analytics Services.** In addition to the tracking technologies, other companies may set their own cookies or similar tools when you visit our Service. This includes third-party analytics services (“Analytics Services”) that we engage to help analyze how users use the Service. The information generated by the Cookies or other technologies about your use of our Service (the “Analytics Information”) is transmitted to the Analytics Services. The Analytics Services use Analytics Information to compile reports on user activity, which we may receive on an individual or aggregate basis. We use the information we get from Analytics Services to improve our Service. The Analytics Services may also transfer information to third parties where required to do so by law, or where such third parties process Analytics Information on their behalf. Each Analytics Services’ ability to use and share Analytics Information is restricted by such Analytics Services’ terms of use and privacy policy. By using our Service, you consent to the processing of data about you by Analytics Services in the manner and for the purposes set out above.

We may receive Personal and/or Anonymous Data about you from companies that offer their products and/or services for use in conjunction with our Service or whose products and/or services may be linked from our Service. For example, third-party wallet providers provide us with your blockchain address and certain other information you choose to share with those wallets providers. We may add this to the data we have already collected from or about you through our Service.

We collect data from activity that is publicly visible and/or accessible on blockchains. This may include blockchain addresses and information regarding purchases, sales, or transfers of NFTs, which may then be associated with other data you have provided to us.

Why do we process your personal data?

We process your Personal Data to run our business, provide the Service, personalize your experience on the Service, and improve the Service. Specifically, we use your Personal Data to:

- facilitate the creation of and secure your account;
- identify you as a user in our system;
- provide you with our Service, including, but not limited to, helping you view, explore, and create NFTs using our tools and, at your own discretion, connect directly with others to purchase, sell, or transfer NFTs on public blockchains;
- improve the administration of our Service and quality of experience when you interact with our Service, including, but not limited to, by analyzing how you and other users find and interact with the Service;
- provide customer support and respond to your requests and inquiries;
- investigate and address conduct that may violate our Terms of Service;
- detect, prevent, and address fraud, violations of our terms or policies, and/or other harmful or unlawful activity;
- display your username next to the NFTs currently or previously accessible in your third-party wallet, and next to NFTs on which you have interacted;
- send you a welcome email to verify ownership of the email address provided when your account was created;
- send you administrative notifications, such as security, support, and maintenance advisories;
- send you notifications related to actions on the Service;
- send you newsletters, promotional materials, and other notices related to our Services or third parties' goods and services;
- respond to your inquiries related to employment opportunities or other requests;
- comply with applicable laws, cooperate with investigations by law enforcement or other authorities of suspected violations of law, and/or to pursue or defend against legal threats and/or claims; and
- act in any other way we may describe when you provide the Personal Data.

We may create Anonymous Data records from Personal Data. We use this Anonymous Data to analyze request and usage patterns so that we may improve our Services and enhance Service navigation. We reserve the right to use Anonymous Data for any purpose and to disclose Anonymous Data to third parties without restriction.

We only keep your data for as long as necessary to achieve the purpose for which we process the data.

Personal Data is collected either:

- (i) based on your consent, or
- (ii) in our legitimate interest.

Purpose of processing	Legal basis	Retention period
Statistical analysis and audience measurement to improve our website	Consent	13 months
Managing requests and queries through online forms	Consent	Duration required to manage your requests and queries.
Defending our interests in the event of a dispute or court action	Legitimate Interest	5 years
Sending messages by email or sms (electronic commercial prospecting)	Consent	Until you withdraw your consent or, failing that, until 3 years after your last contact

We may retain your Personal Data as long as you continue to use the Service, have an account with us, or for as long as is necessary to fulfill the purposes outlined in this Privacy Policy. We may continue to retain your Personal Data even after you deactivate your account and/or cease to use the Service if such retention is reasonably necessary to comply with our legal obligations, to resolve disputes, prevent fraud and abuse, enforce our Terms or other agreements, and/or protect our legitimate interests. Where your Personal Data is no longer required for these purposes, we will delete it.

Who has access to your personal data?

We disclose your Personal Data as described below and as described elsewhere in this Privacy Policy.

We may transfer your personal data to MintUp personnel.

We may share your Personal Data with third party service providers to: provide technical infrastructure services; conduct quality assurance testing; analyze how our Service is used; prevent, detect, and respond to unauthorized activities; provide technical and customer support; and/or to provide other support to us and to the Service.

- Our Service may contain links to third-party websites. When you click on a link to any other website or location, you will leave our Service and go to another site, and another entity may collect Personal Data from you. We have no control over, do not review, and cannot be responsible for these third-party websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these third-party

websites or their content, or to any collection of your Personal Data after you click on links to such third-party websites. We encourage you to read the privacy policies of every website you visit. Any links to third-party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content, or websites.

- To use our Service, you must use a third-party wallet which allows you to engage in transactions on public blockchains. Your interactions with any third-party wallet provider are governed by the applicable terms of service and privacy policy of that third party.

We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition, or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

Regardless of any choices you make regarding your Personal Data (as described below), MintUp may disclose Personal Data if it believes in good faith that such disclosure is necessary: (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas, warrants, or other legal process served on MintUp; (c) to protect or defend the rights or property of MintUp or users of the Service; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Service.

We may also disclose your Personal Data: to fulfill the purpose for which you provide it; for any other purpose disclosed by us when you provide it; or with your consent.

Is any Personal Data transferred outside of the European Union?

Any transfer of your Data outside of the EU will take place with appropriate safeguards in place that comply with applicable personal data protection regulations.

How is your personal data secured?

We use appropriate technical and organizational measures to keep your personal data secure and confidential.

In this respect, we ensure in particular the management of the accesses internally and carry out operations of computer safeguarding.

These measures aim to protect your personal data against unauthorized access, use, modification or disclosure.

What are your rights in relation to your personal data?

You can view, access, edit, or delete your Personal Data for certain aspects of the Service via your Settings page. You have the right to information, access, rectification, deletion, limitation and portability of your personal data.

To obtain more information of your rights, we advise you to read the section of the CNIL intended for this purpose -> <https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles>

You also have the right to object to the processing of your personal data on legitimate grounds.

When the processing of your data is based on consent, you have the possibility to withdraw it at any time, without justification.

You also have the right to define directives concerning the conservation, deletion and communication of your personal data after your death.

You may exercise your rights in relation to your personal data via the contact form of our website, by e-mail at contact@mintup.io or by mail at the following address:

MintUp
Bureau 326 -78 avenue des Champs-Élysées
75008 Paris
France

All requests will be processed as soon as possible and in accordance with the applicable law. If you consider that the treatment of your personal data infringes your rights, you have the possibility to introduce a complaint to the CNIL:

CNIL
3 Place de Fontenoy
75334 PARIS CEDEX 07
France
Phone: +33 (0)1 53 73 22 22
www.cnil.fr

How can you contact us?

If you have any questions regarding your personal data, please contact us by e-mail at contact@mintup.io or by mail at the following address:

MintUp
Bureau 326 -78 avenue des Champs-Élysées
75008 Paris
France

Last modification of the Privacy Policy: 11/11/2022