

PRIVACY POLICY

This document (the “**Privacy Policy**”) informs you of Blockoville policies regarding the collection, use and disclosure of personal information when you use Blockoville Website (the “**Website**”), and any other websites, features, applications, widgets or online services (collectively, the “**Services**”). By registering an account via the Blockoville Website or the App, you agree to the collection and use of information in accordance with this Privacy Policy.

The definitions of terms starting with capital letters can be found in the Blockoville Terms and Conditions (the “**Terms**”), which together with this Privacy Policy must be read and accepted prior to using the Blockoville Website, App and/or Services.

INFORMATION COLLECTION AND USE

Information You Provide to Us

When you use the Service, you may provide us with information about you. This may include your name and contact information, financial information to make or receive payment for services obtained through the Website and Services, or information essential for compliance with relevant laws.

When registering an account through the Website, we may ask you to provide us with personal information needed to identify you. You do not have a statutory obligation to provide us with any information, but you may have a contractual obligation to do so, and if we do not receive certain information from you, we will not be able to provide our Services to you. If you have any questions regarding whether provision of information is mandatory and the consequences for withholding such information, please contact us using the contact information below.

The types of information we may require are as follows:

- (a) **Contact information:** for example your name, country of citizenship, mailing address, telephone number, and email address;
- (b) **Identity verification data:** we may request documents to verify your identity, such as a copy of your government-issued identification document or photo or a billing/bank statement, document to verify your place of residence, photos or videos for facial recognition;
- (c) **Payment Information:** If you are using the Service to make or receive payments, we will also collect certain payment information, such as credit card, address of crypto wallet or other financial account information, and billing address.
- (d) **Biographic or demographic information:** We also may collect other information, such as zip codes, your date of birth, gender, (if applicable) your relationship between you and the legal entity you are representing;
- (e) **Social network data:** for example, your Facebook, Google, LinkedIn, Twitter, Instagram username;
- (f) **User account data:** your username and password to access the Blockoville Platform;

Collecting some of the information described above is obligatory to register a user account with Blockoville Platform, carry out the identity verification procedure to meet the standards established by the applicable laws and/or provide you with the Services. Such obligatory information has been marked with an asterisk (*) in the Platform, App or the Website.

Information Received from Third Parties

We also may receive information about you from third parties. For instance, in order to effectively carry out identity verification procedure in accordance with the applicable anti-money laundering and terrorist financing prevention laws, we may also obtain information from other sources and combine that with information we collect through the Services. For example, we may collect information

available about you from publicly accessible websites, social media networks or public databases. We may also make inquiries to governmental agencies, financial institutions, international agencies and non-public third-party databases to verify the correctness of the information you have provided to us.

Information Collected Automatically

We and our third party service providers, including analytics and third party content providers, may automatically collect certain information from you whenever you access or interact with the Services. This information may include, among other information, the browser and operating system you are using, the URL or advertisement that referred you to the Service, the search terms you entered into a search engine that led you to the Service, areas within the Service that you visited, which links you clicked on, which pages or content you viewed and for how long, other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages and other information commonly shared when browsers communicate with websites. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, and to improve marketing, analytics, and site functionality.

The information we collect also includes the Internet Protocol (“**IP**”) address or other unique device identifier (“**Device Identifier**”) for any device (computer, mobile phone, tablet, etc.) used to access the Service. A Device Identifier is a number that is automatically assigned or connected to the device you use to access the Service, and our servers identify your device by its Device Identifier. Some mobile service providers may also provide us or our third party service providers with information regarding the physical location of the device used to access the Service.

In addition, we and our marketing partners, affiliates, analytics, and service providers may use a variety of other technologies (such as tags) that collect similar information for security and fraud detection purposes and we may use third parties to perform these services on our behalf.

Cookies: Blockoville also uses cookies to administer the website, track users’ movements around the website, and to gather demographic information about our user base as a whole. Cookies are small pieces of text sent by your web browser by a website you visit. Cookies may store user preferences and other information. Cookies provide a convenience feature to save you time or tell the Web server that you have returned to a specific page. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.

We use first party and third-party cookies for several reasons. Some cookies are required for technical reasons in order for our Websites to operate, and we refer to these as "strictly necessary" cookies. You have the right to decide whether to accept or reject cookies. You can exercise your cookie preferences by clicking on preferable options via the consent form provided on our website.

Strictly necessary website cookies: Because these cookies are strictly necessary to deliver the Websites to you, you cannot refuse them. You can block or delete them by changing your browser settings however, as described above

You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our website may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

HOW WE USE YOUR PERSONAL INFORMATION

Processing of Your Personal Information is done in order to comply with our legal obligations, as well as to take steps at Users' request in anticipation of entering into a contract with them. We use your information to provide and improve the Service, complete your transactions, address your inquiries, process your registration and verify the information you provide is valid. We also handle Personal Information on the grounds that it furthers our legitimate interests in commercial activities, such as providing the Services, analysing and improving our business and for communication purposes, however, in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals. Personal information is therefore collected strictly for the following purposes:

- (a) Your contact information, identity verification data as well as the data we obtain from other sources is used to carry out the identity verification procedure that would meet the standards of the applicable anti-money laundering and terrorist financing prevention laws and standards (notably the Estonian Money Laundering and Terrorist Financing Prevention Act);
- (b) Your user account data, contact information and the data we collect automatically in the course of your usage of the Services is used to provide you the Services, including managing your user account, providing customer support, sending updates, collecting fees, etc. Contact information and data we collect automatically is also used to prevent potentially prohibited or illegal activities carried out via the Platform or the Website and enforce the Terms;
- (c) Device and log information is also used to measure and improve the Services that are available;
- (d) Bank account, credit card details, crypto wallet address will be directly forwarded to the payment service provider for processing payment. Blockoville will not be able to access your bank account or credit card details at any time;
- (e) Should you so indicate separately via the App or the Website, we will use your name and e-mail to deliver you marketing and promotional offers on behalf of Blockoville;
- (f) We may also use the information about you for any other purpose for which the information was collected, provided that such purpose was disclosed to you at the time of collection or you provided a separate consent for processing your data for such purpose.

DATA RETENTION

You may, at any time, request to receive the personal information you have provided to us in the course of using the Blockoville platform in a structured, commonly used and machine-readable format and have the right to transmit the data to another service provider. Please send the respective request to info@blockoville.com.

You may at any time request to see and update the personal information collected about you in course of using the Services in the Account section of the Blockoville platform. You may withdraw your consent for further processing of your personal data by deleting your user account on the Website.

We will retain your personal information only for so long as it is required for the purposes for which it was collected. This period may extend beyond the end of your relationship with us, but only for so long as is reasonably necessary for us to have sufficient information to respond to any legal issues that may arise after the end of your relationship with us or for as long as required by law. When your personal information is no longer required, we will destroy, delete or convert it into an anonymous form.

AUTHORIZED PROCESSORS AND THIRD-PARTY DISCLOSURE

We may share aggregated non-identifiable Information and we may otherwise disclose non-identifiable Information (including, without limitation, hashed information) to third parties. We do not share your Personal Information with third parties for those third parties' marketing purposes unless we first provide you with the opportunity to opt-in to or opt-out of such sharing. We do not sell or trade your personal data to any third parties. We may also share the information we have collected

about you, including Personal Information, as disclosed at the time you provide your information, with your consent, as otherwise described in this Privacy Policy, or in the following circumstances:

- **Information about Freelancers to be shared with Clients:** We share information regarding freelancers who have entered into a contract with a client, including information on work history, with prospective Clients. If you choose to view a job post or submit a proposal for work as a freelancer via Services, we may share relevant information with the applicable client(s), including, but not limited to, the information contained in your freelancer Profile;
- **Information about Clients to be shared with Freelancers:** If you have entered into a service contract or agreed to use services from another user, we may provide him/her with your name, company address, billing address, or tax ID or VAT number in order to complete the transaction or to facilitate the resolution of a claim or dispute. The user receiving your information is not allowed to use it for purposes unrelated to the transaction, such as to contact you for marketing purposes, unless you have expressly consented to it.
- **Service Providers:** We may employ third party companies and individuals to facilitate our Services, to provide the Services on our behalf, to perform Service-related services (e.g., without limitation, maintenance services, database management, web analytics and online advertising, payment processing, fraud detection and improvement of Blockoville's features) or to assist us in analyzing how our Services are used. These third parties may have access to your Personal Information in order to perform these tasks on our behalf.
- **Legal and Investigative Purposes:** Blockoville will share information with government agencies as required by law in response to lawful requests by public authorities, including to meet national security or law enforcement requirements and, including without limitation, in connection with reporting earnings. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), or, at the request of governmental authorities or other third parties conducting an investigation where we determine in our sole discretion the disclosure is necessary to (a) protect the property and rights of Blockoville or a third party, (b) protect the safety of the public or any person, or (c) prevent or stop activity we may consider to be, or pose a risk of being, illegal, fraudulent, unethical or legally actionable activity.
- **Internal Transfers:** As some of the Blockoville Services may be provided by our parent, subsidiary or affiliate companies, we may make your data available to our affiliate companies in order to provide you the Services, Blockoville may share information, including Personal Information, with any current or future parent, subsidiaries or affiliates, primarily for business and operational purposes. We may sell, transfer, or otherwise share some or all of our assets, including your Personal Information, in connection with a merger, acquisition, reorganization or sale of assets (including, in each case, as part of the due-diligence process with any potential acquiring entity) or in the event of bankruptcy.

In addition, we will only provide your data to third parties if you have consented to such transfer of your data pursuant to the privacy policy with a third-party Service Provider or if such transfer is required by law.

In addition to the above, Blockoville may use other third party authorized processors such as technical service providers, identity verification services, mail carriers, IT companies, communication agencies, and hosting providers to process your data in order to provide you the Services. For example, your

data may be stored in servers hosted by third party cloud service provider Azure Cloud Service, which may be located anywhere around the world. The data stored in such servers is secured and cannot be accessed by any third parties. Please contact Blockoville to receive an updated list of such authorized processors. Any such authorized processor shall be obliged to adhere to the restrictions set forth in this Privacy Policy and the applicable data protection laws.

YOUR RIGHTS IN RELATION TO DATA PROTECTION

As data subject, you have a number of rights in relation to how we process your Personal Information. These include the right to:

- a) access the Personal Information that we may hold about you;
- b) rectify any inaccurate Personal Information that we may hold about you;
- c) have your Personal Information erased in certain circumstances, for example, where it is no longer necessary for us to process your Personal Information to fulfill our processing purposes; or where you have exercised your right to object to the processing;
- d) restrict the processing of your Personal Information where, for example, the information is inaccurate or it is no longer necessary for us to process such information or where you have exercised your right to object to our processing;
- e) object to the processing of your Personal Information which may be exercised in certain circumstances, for example, where we are processing your Personal Information for direct marketing purposes, or where your own legitimate interests outweigh ours; and
- f) have your data ported to a new service provider if you no longer wish to use the Services.

You may exercise these rights by contacting us at **info@blockoville.com**.

You will not have to pay a fee to access your Personal Information or to exercise any of your other rights. We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

PROTECTION OF PERSONAL INFORMATION

We endeavour to maintain appropriate physical, procedural and technical safeguards with respect to our offices and information storage facilities in order to prevent any loss, misuse, or unauthorized access, disclosure, or modification of your personal information.

We further protect personal information by restricting its access to those employees, contractors, advisers, affiliates and service providers that we determine to reasonably require access to such information for any of the purposes stated in this Privacy Policy.

THIRD PARTY WEBSITES AND SERVICES

The Website or App may provide you access to websites or services owned and operated by third parties. These third-party websites and services may have their own privacy policies and are not governed by this Privacy Policy. We are not responsible for the privacy practices or the content of any third-party websites or services. Third party websites and services may collect, use and disclose personal information differently than us, so we encourage you to carefully read and review the privacy policy for each third-party website and service that you connect to your Blockoville platform.

DIRECT MARKETING

We may send you e-mails for marketing purposes but only with your explicit consent. In case you wish to stop receiving e-mails for marketing purposes, please click unsubscribe button, which can be found at the end of such e-mails.

CHANGES TO THIS POLICY

Blockoville may update this Privacy Policy at any time and any changes will be effective upon posting. In the event that there are substantial changes to the way we treat your Personal Information, we will display a notice through the Services prior to the change becoming effective. We may also notify you by email, in our discretion. However, we will use your Personal Information in a manner consistent with the Privacy Policy in effect at the time you submitted the information, unless you consent to the new or revised policy.

INFRINGEMENT OF PRIVACY

If you have any questions related to this policy or in case of any suspected infringement of your privacy, please contact us at **info@blockoville.com**

The Privacy Policy of Blockoville is subject to Estonian law (except the conflict of laws rule) and any disputes shall be brought exclusively to courts located in Tallinn, Estonia.

Blockoville OÜ, a limited liability company registered in Estonia under registration number 14625867, with a registered address at Roosikrantsi tn 2-681, Tallinn, Harjumaa, Estonia, 10119.