

Privacy Notice

Last updated: July 30, 2024

A Labs R&D Limited is committed to protecting the privacy of our users and we, therefore, ask that you please read this Privacy Notice (this “**Notice**”) before providing us with any information about you or any other person.

This Notice sets out what personal data we collect, how we process it, and how long we retain it. This Notice applies to our processing activities where we act as a data controller.

Navigating This Notice

Contact Us

Definitions

How We Collect and Process Your Data

App Data

Marketing Data

Contact Data

Analytical Data

Purposes and Legal Basis

How Long We Process Your Data

How We Secure Your Data

Sharing Your Personal Information

Hyperlinks

Your Information and Social Media

Your Information and Blockchain

Your Rights

Right to Information and Access

Right to Rectification

Right to Erasure

Right to Restrict Processing and Right to Object to Processing

Right to Data Portability

Rights Related to Automated Decision-Making

Right to Object to Direct Marketing

Right to Request Access

Right to Withdraw Consent

Right to Lodge a Complaint With a Supervisory Authority

Children Personal Data

Review of This Notice

Contact Us

Any questions regarding this Notice or processing your data should be sent to:

A Labs R&D Limited

Intershore Chambers

Road Town

Tortola, VG1110

Email: team@akropolis.io

Definitions

In this Notice:

“**App**” means the Akropolis Application web interface available at <https://www.akropolis.io/app/home>.

“**Personal data**” or “**personal information**” means any information relating to you as an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly.

“**Platform**” means collectively the Website and App.

“**Processing**” means any operation or set of operations that is performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, alignment or combination, restriction, erasure or destruction.

“**We**”, “**us**”, and “**our**” refers to A Labs R&D Limited, a company incorporated in BVI with a registered address at Intershore Chambers, Road Town, Tortola, BVI and incorporation number 2127065.

“**Website**” means the website located at <https://akropolis.io>.

“**You**”, “**your**”, and “**yours**” refers to you as a natural person, visitor and user of the Platform.

How We Collect and Process Your Data

We do not use your personal data to conduct automatic decision-making or profiling. We process the following categories of data:

App Data

Public blockchain address (the “**Address**”) — when and if you connect your wallet to the App.

Information about your transactions on the blockchain network with the Address — when and if you connect your wallet to the App. We collect this information from the respective blockchain network.

Please consider the “Your Information and Blockchain” section of this Notice.

Marketing Data

Within the Website, you may subscribe to receiving our marketing emails concerning the Akropolis project, related products and services, and blockchain industry. If you subscribe to receiving our marketing emails, we will process the email address that you provide to us.

In order to process your email address, we use [Substack](#) solution, which is operated by Substack Inc., 111 Sutter Street, 7th Floor, San Francisco, CA, 94104, USA. Substack is a joint controller of the email address you provide to subscribe to our newsletter. You may exercise your data protection rights against both of us. Substack processes your personal data in accordance with their [Privacy Policy](#).

You may unsubscribe from receiving marketing emails from us at any time by contacting us or clicking the unsubscribe button available at the bottom of each marketing email. In such a case, we will delete your email address from the respective marketing database.

Please note that administrative or service-related communications (security alerts, email verifications, maintenance notifications, etc.) are not considered marketing and such communications may not offer an option to unsubscribe.

Contact Data

You may contact us either via the contact details provided on the Platform. When you contact us, you may provide us with certain additional personal information, such as your email address, name, or wallet address. Unless it is necessary for the purposes of your inquiry, we do not request you to provide any additional personal data.

Analytical Data

We use Google Analytics to analyse the use of the Platform. Google Analytics gathers information about the use of the Platform by means of cookies. Cookies are a feature of the web browser software that allows web servers to recognise the device used to access the Platform. A cookie is a small text file that the Platform saves on your computer or mobile device when you visit the Platform. They allow the Platform to remember your actions and preferences over a period of time to improve our products and services.

Google Analytics is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, and its affiliates including Google LLC, 1600, Amphitheatre Parkway, Mountain View, CA, 94043, USA.

The information gathered by Google Analytics includes the following: (1) IP address, (2) the type of device used, (3) the device operating system, (4) the browser used. After collecting the personal data, Google Analytics creates reports about the use of the Platform, which contain the aggregated information where we do not see any data pertaining to a particular person. In other words, we cannot identify you from the other visitors of the Platform. Please note that according to [Google Analytics documentation](#), the IP address is anonymised (masked), so neither we nor Google can identify the IP address of a particular visitor.

In addition to the above, with Google Analytics we collect certain information regarding the use of the Platform, for instance, when you clicked a certain button or made some input. This information is also aggregated and we cannot identify your actions from the actions of other Platform visitors.

To our knowledge, the data collected via Google Analytics is not anonymised (with the exception of the IP address) and will be transmitted to, processed and stored by Google in the United States. You can learn more about how Google processes personal data in [Google's privacy policy](#). Note that competent US state authorities may have access to the personal data collected via Google Analytics.

With respect to the personal data collected via Google Analytics, Google acts as our data processor. However, Google may use this personal data for any of its own purposes, such as profiling and cross-platform tracking. In this case, Google acts as an independent data controller. You can learn more about Google Analytics, its purposes and functions [here](#).

To use Google Analytics, we will ask for your consent. When you visit the Platform, you are able to opt out from using Google Analytics. You also may object to the collection of personal data by Google Analytics by downloading and installing a [browser add-on from Google](#).

Purposes and Legal Basis

Data	Purpose	Legal Basis
App Data	To provide you with the App functionality	Performance of contract with you
Marketing Data	To provide you with our marketing emails concerning the Akropolis project, related products and services, and blockchain industry	Consent
Contact Data	To assist you with your inquiry	Legitimate interest
Analytical Data	To understand the usage of the Platform and improve it	Consent

How Long We Process Your Data

Data	Storage Period
App Data	As long as your wallet is connected to the App
Marketing Data	Until you opt out from receiving our marketing emails
Contact Data	For one (1) year following the date of contact
Analytical Data	Storage periods are described in the Google Analytics Documentation

If necessary under the applicable legislation or for the protection of rights and obligations, we may process the above data longer than described above.

How We Secure Your Data

We do our best to utilize appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For example, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a need to know such data. They are subject to a duty of confidentiality and will process your personal data only on our instructions.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Sharing Your Personal Information

We do not sell or rent out your personal data. However, we may share your personal data if it is reasonably necessary for the performance of our undertakings with you and our legitimate interest to maintain and develop the Platform. In addition, you should consider the “Your Information and Social Media” and “Your Information and Blockchain” sections below.

Your personal information is shared with the following categories of recipients:

- our affiliates, if necessary due to our corporate structure;

- our contractors, advisors, agents, and consultants, for example with our support team;
- hosting providers;
- courts and government institutions that may request access to your personal data.

In addition, we may transfer your personal information to a third party as part of a sale of some, or all, of our business and assets or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation. However, we will take reasonable steps to ensure that your privacy rights continue to be protected.

Please note that we and the aforementioned recipients may be located in jurisdictions that do not ensure the same level of data protection as the country of your residence. We will endeavour to protect your personal data while it is processed, stored, and transferred. When we transfer personal data to a country that does not ensure sufficient level of data protection, we will use additional safeguards. You may request us to provide the information regarding such safeguards.

Hyperlinks

We may provide hyperlinks from our website to websites of other organisations or companies. Please note that we will not be liable for the content of linked websites or any transactions carried out with organisations operating those websites. The privacy policies/notices/statements of others may differ significantly from this Notice. Therefore, we encourage you to read the privacy policy/notice/statement of each and every website that collects personal data.

Your Information and Social Media

The Website contains links and plugins to our social media accounts, such as Discord, Telegram, Medium, etc. Please be aware that when you access and use any social media, your personal data will be processed by respective operators of social media and certain data may be accessed by third parties, such as other social media users. We are not responsible for the processing of your personal data on such social media. Therefore, we encourage you to share as minimum personal data as possible and read the privacy policy/notice/statement of each and every social media that collects personal data.

Your Information and Blockchain

The App Data is available on the blockchain networks. Due to the blockchains' nature, the App Data will be publicly available and we will not be data controllers with respect to such information processed within the blockchain networks.

Blockchain technology, also known as distributed ledger technology, is at the core of our activity. Blockchains are decentralised and made up of digitally recorded data in a chain of packages called "blocks." The manner in which these blocks are linked is chronological, meaning that the data is very difficult to alter once recorded. Since the ledger may be distributed all over the world across several "nodes" which usually replicate the ledger. This means there is no single person making decisions or otherwise administering the system (such as an operator of a centralised system), and that there is no centralised place where it is located either.

Accordingly, by design, blockchain records cannot be changed or deleted and are said to be "immutable." Data on the blockchain cannot generally be erased or changed. This may affect your ability to exercise your rights such as your right to erasure, the right to rectification of your data or your rights to object or restrict processing, of your personal data.

In most cases, the ultimate decision to (i) transact on the blockchain using your digital asset wallet address, as well as (ii) share the public key relating to your digital asset wallet address with anyone (including us) rest with you.

If you want to ensure your privacy rights are not affected in any way, you should not transact on blockchains as certain rights may not be fully available or exercisable by you or us due to the technological infrastructure of the blockchain. In particular, the blockchain is available to the public and any data shared on the blockchain will become publicly available.

Your Rights

You have certain rights under applicable legislation, which are explained below. Note that we may request certain additional information to confirm that you are authorised to exercise such rights.

Right to Information and Access

You have a right to be informed about the processing of your personal data (and if you did not give it directly to us, information as to the source of obtaining such data). This Notice intends to provide you with all necessary information regarding our processing. If you have any further questions you can contact us on the above details.

Right to Rectification

You have the right to have any inaccurate personal information about you rectified and to have any incomplete personal information about you completed. You may also request that we restrict the processing of that information.

The accuracy of your information is important to us. If you wish to advise us of any changes to your personal information, you may use the respective tools available on the website or you may contact us at the above details. Please note that when interacting with a blockchain we may not be able to ensure that your personal data is rectified.

Right to Erasure

You have the right to request the erasure of your personal information in the following circumstances:

- the personal information is no longer necessary for the purpose for which it was collected;
- you withdraw your consent to the processing based on consent and no other legal justification for processing applies;
- you object to processing for direct marketing purposes;
- we unlawfully processed your personal information; and
- erasure is required to comply with a legal obligation that applies to us.

However, when interacting with a blockchain we may not be able to ensure that your personal data is deleted. This is because the blockchain is a public decentralised network and blockchain technology does not generally allow for data to be deleted and your right to erasure may not be able to be fully enforced. In these circumstances, we will only be able to ensure that all personal data that is held by us is permanently deleted.

We will proceed to comply with an erasure request without delay unless continued retention is necessary for:

- exercising the right of freedom of expression and information;
- complying with a legal obligation under the applicable law;

- the performance of a task carried out in the public interest;
- archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- the establishment, exercise, or defence of legal claims.

Right to Restrict Processing and Right to Object to Processing

You have a right to restrict the processing of your personal information, such as where:

- you contest the accuracy of the personal information;
- where processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed personal information;
- we no longer need to process your personal information but need to retain your information for the establishment, exercise, or defence of legal claims.

You also have the right to object to the processing of your personal information under certain circumstances, such as where the processing is based on your consent and you withdraw that consent.

However, when interacting with a blockchain, as it is a public decentralised network, we will likely not be able to prevent external parties from processing any personal data which has been written onto the blockchain. In these circumstances, we will use our reasonable endeavours to ensure that all processing of personal data held by us is restricted, notwithstanding this, your right to restrict to processing may not be able to be fully enforced.

Right to Data Portability

Where the legal basis for the processing is (1) your consent or (2) necessity for the performance of a contract with you, you have a right to receive the personal information you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

Rights Related to Automated Decision-Making

Where and if any automated decision-making takes place, you have the right to express your point of view and to contest the decision, as well as request that such decisions are made by natural persons, not only by computers.

Right to Object to Direct Marketing

You have a choice about whether or not you wish to receive information from us. We will not contact you for marketing purposes unless:

- you have a business relationship with us, and we rely on our legitimate interests as the lawful basis for processing; or
- you have given your prior consent.

Each marketing communication will provide you with the option for you to exercise your right to object to the processing of your personal data for marketing purposes (known as “opting-out”) by clicking on the “unsubscribe” button on our marketing emails. You may also opt out at any time by contacting us on the above details.

Please note that any administrative or service-related communications (to provide our services, use our products, or notify you of an update to this Notice or applicable terms, etc.) are not considered direct marketing and such communications generally do not offer an option to unsubscribe.

Right to Request Access

You also have a right to access the information we hold about you. We are happy to provide you with details of your personal data that we process. You can exercise this right at any time by contacting us on the above details.

Right to Withdraw Consent

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time by contacting us on the above details.

Right to Lodge a Complaint With a Supervisory Authority

You may file a complaint with a relevant supervisory authority in case we violate your rights or obligations imposed on us under the applicable legislation. The relevant supervisory authority will particularly depend on where you are located.

Children Personal Data

The Platform is not intended for the use of children (under 18 years old or older, if the country of your residence determines a higher age restriction). We do not knowingly market to, or solicit data from children. We do not knowingly process, collect, or use personal data of children, and in case we receive such data, we will erase it within a reasonable timeframe.

Review of This Notice

We keep this Notice under regular review and may update it at any time. If we make any changes to this document, we will change the “Last updated” date above. Please review this Notice regularly.

[END OF DOCUMENT]
