

Privacy Policy

Last Updated: 19th April 2021

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

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

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

A Labs Limited

Suite 23 Portland House

Glacis Road

Gibraltar, GX11 1AA

Email: team@akropolis.io

Definitions

In this Policy:

“We”, “us” and “our” refers to A Labs Limited, a company incorporated in Gibraltar with a registered address at 23 Portland House, Glacis Road, Gibraltar and incorporation number 116430. For more information about us, see the “Contact Us” section of this Policy.

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

“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.

“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.

“Website” means the website located at <https://akropolis.io/>, including any subdomains and applications available therein.

How We Collect and Process Your Data

As a general rule, we collect and process your personal data via the website. In particular, we collect personal data using Google Analytics tools. Please learn more about how we use Google Analytics in the respective section below.

We may also process your personal data when you contact us. Such data may include your name, email address, social media nickname, phone number, or digital asset wallet address. In such a case, we will process your personal data in order to respond to your request and communicate with you. The legal basis for such processing is our legitimate interest to assist with and respond to your request.

We do not use automated decision-making methods based on your personal data (including profiling).

We may also collect certain personal data via other tools and applications that may be available on the website from time to time. In such cases, we will either update this Policy or supplement it with another privacy policy/notice/statement that will explain to you the details about such processing activities. When we supplement this Policy with another document, we will provide such document to you at the point of data collection.

To understand more regarding particularities of processing personal data when interacting with us or our products and services, please read “Your Information and Social Media” and “Your Information and Blockchain” sections of this Policy.

Google Analytics

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

The information gathered by Google Analytics includes the following: (1) IP address, (2) the type of device used, (3) the device’s operating system, (4) the browser used. After collecting the personal data, Google Analytics creates reports about the use of our website, 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. 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 our website, 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 visitors.

To our knowledge, the data collected via Google Analytics, with the exception of the IP address, is not anonymized 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. In addition, Google may use this personal data for any of its own purposes, such as profiling and cross-platform tracking. You can learn more about Google Analytics, its purposes and functions [here](#).

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

How Long We Keep Your Information

We retain your information only for as long as is necessary for the purposes for which we process the information.

Retention periods are determined based on the type of record, the nature of the record and activity and the legal or regulatory requirements that apply to those records. Data collected via Google Analytics is not stored for more than 2 years. Personal data which is collected pursuant to our legal obligations (such as AML) are retained for 5 years. Personal information which is collected pursuant to a contract is retained for 6 years after the termination of the contract.

However, we may retain your personal data for a longer period of time where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person or where we have a legitimate interest to do so.

All personal data is retained in accordance with our internal retention and deletion policy.

Data Security

We do our best to utilise 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 will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

Hyperlinks

We may provide hyperlinks from our website to websites of other organisations or associated 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 Policy. 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

Our 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 data as possible and read the privacy policy/notice/statement of each and every social media that collects personal data.

Your Information and Blockchain

Blockchain technology, also known as distributed ledger technology, is at the core of our activity. Blockchains are decentralized 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.” 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. Data on the blockchain cannot generally be erased or changed.

In certain circumstances, when you interact with us or when you use our products or services, it may be necessary to provide certain data that may be considered personal. In such cases, due to the blockchains’ nature, certain information will be publicly available and we will not be data controllers with respect to such information. The information may include:

- your digital asset wallet address;
- the amount of digital asset transferred to or from your digital asset wallet address;
- the date and time stamp of your transaction; and
- failed transactions by your address.

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.

Sharing Your Personal Information

We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of and if it is necessary to provide our products and services to you. This may include, for instance, support teams and hosting service providers.

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.

We may transfer your personal data to recipients that are located in countries that do not ensure the same level of data protection as in the country of your or our residence. If we transfer your information to such countries, we will take steps to ensure that your privacy rights continue to be protected as outlined in this Policy and provided for in the applicable legislation. As a general rule, we will use a special document called [Standards Contractual Clauses](#) to ensure the security of the transfer.

Please also note that when interacting with a blockchain, as explained above in this Policy, your personal data may be transferred and stored across the globe, as the blockchain is a global decentralized public network available to any person. In such a case, we do not control and we will not be responsible for such transfer of personal data.

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 Policy 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 general 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 decentralized 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 decentralized 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 our processing is your consent or the processing is necessary 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.

You can change your marketing preferences at any time by contacting us on the above details. On each and every marketing communication we will always provide 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 Policy or applicable terms of business, 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

If you are not satisfied with our processing activities or data protection practices, you have the right to make a complaint to the data protection supervisory authority, which is presently the Gibraltar Regulatory Authority. You may contact the Gibraltar Regulatory Authority on the below details:

Gibraltar Data Protection Commissioner

Gibraltar Regulatory Authority

2nd Floor, Eurotowers 4

1 Europort Road

Gibraltar

Website: <https://www.gra.gi/data-protection>

Email: info@gra.gi

Phone: (+350) 200 74636

Fax: (+350) 200 72166

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work, or the place where you allege an infringement of one or more of our rights has taken place.

Review of This Policy

We may make changes to this Policy from time to time. Where we do so, we will change the “Last Updated” date above. We encourage you to review this Policy whenever you access or use our website to stay informed about our information practices and the choices available to you. If you do not agree to the revised Policy, you should discontinue your use of our website.

[End of Document.]
