

# Privacy Policy

This Privacy Policy (hereinafter referred to as the « Privacy Policy») defines the legal framework for collection, use and treatment by the Company of the personal data of the users browsing and / or making use of the services proposed via the web and mobile platform developed by KEPLERK BLOCKCHAIN (hereinafter referred to as the "Users"), accessible at the address <https://keplerk.com/en/privacy-policy> designed and operated by the Company (hereinafter referred to as the « Platform»).

The information of the personal data collected within the framework of this Privacy Policy is mandatory. This information is necessary for the treatment and for the provision of services offered by the Company via the Application (hereinafter referred to as the "Services"). The lack of information prevents the proper functioning of the Services offered online.

The Company undertakes to respect the applicable regulations regarding the protection of personal data (hereinafter referred to as "Personal Data"), and in particular the obligations deriving from European regulation no. 2016/679 on the protection of personal data (RGPD).

The Company collects personal data only in accordance with the terms of this Privacy Policy and any legal and reasonable instructions given by the Company.



When the Company finds a violation of rights in the processing of personal data, this violation will be notified to the CNIL within a period not exceeding seventy-two (72) hours after becoming aware of it.

Any violation relating to the processing of the User's personal data will be notified to the User concerned by e-mail, within one (1) month.

## **1. COLLECTED INFORMATION**

1.1 For the duration of the use of the Platform and the Services, the Company may collect any information, identifying directly or indirectly the User, necessary for the creation of an account on the Platform and necessary for the proper functioning of the Platform (hereinafter referred to as 'Personal Data').

At the time of its first connection, the User expressly consents to the processing of his Personal Data within the limit of a treatment strictly necessary for the proper functioning of the Platform.

The information of the nominative information collected is obligatory. This information is necessary for the processing and provision of the Services. The lack of information prevents the smooth operation of the Services offered online.

In particular:

- Personal Data relating to the identity of the User and in particular his / her civility, surname, first name, email address, telephone number, postal address and postal code ;
- Personal Data relating to navigation, automatically collected by the Company and in particular the anonymized IP address, the browser

used, the duration of navigation, the system used, language and pages viewed;

- Data relating to the statistics of the visits of the Platform by the Users and in particular the traffic data and other data or communication resources that the User uses by accessing the Platform ;
- User geolocation data collected by the Company.

1.2 The Personal Data may be collected directly when the User communicates it to the Company using the forms for creating an account of User, request for contact, registration to the newsletter available on the Platform and reporting illegal content.

The Company grants itself the right to review, browse or analyze the communications exchanged between the Company and the Users via the Platform for the purposes of preventing fraud, assessment, regulatory compliance, investigation, product development, research and user support.

The collection of Personal Data collected for these purposes is mandatory and strictly necessary for the proper functioning of the Platform. Otherwise the Services can not be provided.

## **2. USE OF COLLECTED PERSONAL DATA**

The Company uses, stores and processes Personal Data in order to feed, understand, improve and develop the Platform, to create and maintain an environment of trust with

Users as well as to comply with the legal obligations incumbent upon it and in particular order to:

### 2.1 Development of the Platform

- Allow Users to access / use the Platform;

- Allow Users to make purchases via the Platform ;
- Allow Users to communicate with Company personnel;
- Manage, protect, improve and optimize the Platform through statistics, analysis and studies ;
- Provide a customer service tailored to the needs of Users ;
- To send to Users Support or Service-related messages, updates, security alerts and notifications;
- As part of the course of actions of detection and prevention of fraud ;

## 2.2 Creating and Maintaining a Trusted User Environment

- Detect and prevent fraud, spam, abuse, security incidents and other harmful activities ;
- Conduct security investigations and risk assessments ;
- Verify or authenticate information or identifications transmitted by Users ;
- Respect the legal obligations incumbent on the Company ;
- Resolve any disputes with Users ;

## 2.3 Provide, Customize, Evaluate and Improve our Advertising and Marketing Services

- Send promotional messages, commercial and advertising information;
- Customize, evaluate and improve the advertising of Services ;

# 3. SHARING AND DISCLOSURE OF PERSONAL DATA

3.1 The Company may disclose Users' Personal Data to courts, governmental or law enforcement authorities or to authorized third parties, if the law as required or permitted, or if such disclosure is reasonably deemed necessary:

(i) to comply with the legal obligations of the Corporation, (ii) to comply with the legal process and to deal with claims against the Company, (iii) to respond to verified inquiries in connection with an alleged or suspected illegal investigation or illegal activity or any other activity that may expose the Company or the User to a legal liability.

3.2 The Company may subcontract all or part of the performance of the Services in compliance with the legal provisions in force.

The Company may also subcontract the hosting services of the Personal Data provided that the Personal Data is processed by a hosting platform located exclusively in the territory of the European Union.

The subcontractor will be authorized to process on behalf of the Company the Personal Data necessary to provide the Services.

3.3 The Personal Data may be transmitted to the technical service providers, for the sole purpose of the proper execution of the Services, or to its various suppliers such as payment solution providers.

## **4. PROTECTION OF PERSONAL DATA - USERS RIGHTS**

4.1 The Personal Data communicated by the User will be destroyed at the latest five (5) years after the end of the use of the Services by the User. The Company reserves the right to keep certain data in order to justify, where appropriate the perfect performance of its contractual or legal obligations. The data thus preserved will be limited to what strictly necessary.

In accordance with article 48 of European regulation no. 2016/679 on the protection of personal data (RGPD), the Company has appointed a delegate for the protection of personal data (DPO), whose coordinates are as follows :

- Name : DJS Avocats
- Adress : 5 rue Lincoln, 75008 Paris,
- Contact : [dpo@djs-avocats.com](mailto:dpo@djs-avocats.com)

4.2 In any case, the Users of a right of access, rectification, modification, opposition, portability and deletion of the Personal Data concerning him in writing to the following address :

dpo@djs-avocats.com by indicating his surname, first name, e-mail and address.

In accordance with the regulations in force, all requests must be signed and accompanied by a photocopy of an identity card bearing the signature of the User.

The User may recover his Personal Data in an open and readable format. The right to portability is limited to the data provided by the User concerned. It applies on the basis of the prior consent of the User. The Company undertakes to transfer, on request, within one (1) month, any document of collection of the Personal Data to the User in order to be able to implement the right to portability. The costs related to the recovery of data are the responsibility of the User by making the request.

## **5. USE OF COOKIES**

In accordance with the CNIL's decision n ° 2013-378 of December 5, 2013, the Company informs, moreover, that cookies record certain information that is stored in the database.

User's hard disk memory. This information is used to generate audience statistics.

An alert message, in the form of a banner, asks the user, in advance, if he wants to accept cookies.

Users going to the home page or another page of the Platform directly from a search engine will be informed:

- precise purposes of the cookies used ;
- the ability to oppose these cookies and change the settings by clicking on a link in the banner ;
- and the fact that the continuation of its navigation is worth agreeing to the deposit of cookies on its terminal.

To guarantee the free, informed and unequivocal consent of the Users on the Platform, the banner will not disappear until it has continued its navigation.

Without prior consent, the deposit and reading of cookies will not be done.

## **6. NEWSLETTER**

Depending on the choices made by the User, he may be the recipient of the newsletter.

By ticking the box provided for this purpose or expressly agreeing to this end, the User agrees that the Company may send him a newsletter (newsletter) may contain information relating to new activities proposed by the Partners of the Company.

Users will be able to unsubscribe from the newsletter by clicking on the link provided for this purpose, present in each of the newsletters (newsletters).