

Privacy Policy

We value our users. We are committed to protecting your right to privacy. When you visit our website (the 'Website') you provide us with your Personal data. The primary task this Privacy Policy aims to is to explain in the clearest and precise way what Personal data we collect, how we use it, how we share it and what rights you can exercise.

We rely on our users. We hope that you spend some of your time to read this Policy. If there are any terms you do not agree with please discontinue your use of our website.

The processing of Personal data is regulated by the European Union General data Protection Regulation EU 2016/679 (hereinafter referred to as the "GDPR"), California Consumer Privacy Act (hereinafter referred to as the "CCPA"), and applicable privacy laws.

Contact us anytime via: privacy@getblock.io

Who We Are

The data controller in respect to GetBlock LLC. (or "we").

Registration number: 21835790

Registered address: Smiljanićeva 6, Vračar Belgrade, 11118, Serbia

What Data We Collect and How We Collect It

Personal data means any information capable of identifying you as an individual, such as your name, e-mail address, or that can be connected to you indirectly, such as your language or location.

We collect personal data that you directly provide to us when registering at Website, expressing an interest in using our service or when participating in our activities or otherwise contacting us.

The personal data we collect depends on the context of your interactions with us, the choices you make and the products and features you use. We also collect or generate personal data when third parties provide information about you, or provided in the course of providing our services, and we may collect personal data from other sources, for example, to keep your information up to date using publicly available sources. The personal data we process can include the following:

Contact data. We collect your email address while you log in and communicate with us via contact forms. Besides, we may collect your Telegram ID, Discord ID, and other similar social media contact data you provide to communicate with us.

Credentials. We collect passwords and similar security data used for authentication and account access.

Service Provider's Login Data. We provide you with the option to register using any service provider's account details like your Google account. Where you choose to do this, we will receive certain profile information about you from such service provider. The profile information we receive may vary depending on the service provider concerned, but such information will often include your name, e-mail address, profile picture as well as other information you choose to make public.

We will use the information we receive only for the purposes that are described in this Policy or that are otherwise made clear to you on Website. Please note that we are not responsible for the ways in which any service provider processes any of your personal data and invite you to read their privacy notices and policies for further information on how they process your personal data.

All personal data that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal data.

Usage data - data automatically collected

We automatically collect certain information through cookies and similar technologies when you visit, use or navigate Website. This information does not reveal your specific identity (like your name or contact information) and does not allow to identify you. However, it may include device and usage information, such as your IP address, browser and device characteristics, its type and version, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Website, information about your interaction in our emails, and other technical and statistical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Specifically, as the RPC provider, we do not log and store your IP address, country, location and similar data.

How We Use Your Personal Data

We use your Personal data primarily for the following purpose - to enable efficient, optimal and adapted use of Website.

Besides we may use your Personal data:

- to ensure smooth administration of the Website;
- to ensure functionality of the Website and personalize it;
- to ensure timely and appropriate processing of user's queries, requests, and replies;
- to contact user regarding any information they provides;
- to diagnose and fix issues with Website;
- to enable us to perform statistical and other analysis by continuously improving the content of Website;
- to directly advertise our Services;
- to analyze the Services and target ads;
- to comply with legal requirements and law enforcement requests;
- to conduct business planning, reporting, and forecasting;
- to establish, exercise, or defend legal claims.

We may use your personal data for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and

improve our Website, products, services, marketing, and your experience.

Legal Basis

We may process or share your Personal data based on the following legal basis:

Consent: if the processing of Personal data is carried out based on your specific consent, you have the right to withdraw it at any time by sending us a request to privacy@getblock.io or following the instruction given in our Cookie Policy.

Legitimate interest: we may process your Personal data when it is reasonably necessary to achieve our legitimate business interests. In addition, we may disclose your Personal data where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

Legal obligations: we may disclose your Personal data where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

Performance of the contract: where we have entered into a contract with you, we may process your Personal data to fulfill the terms of our contract, and for the following purposes:

- to develop, improve and deliver our Services;
- to make our Services known and popular;
- to make the use of our Services secure for the Users.

We may combine all the information we collect from or receive about you for the outlined purposes. We may aggregate or de-identify your information and may use or share aggregated or de-identified information for any purpose, and such information is not subject to this Privacy Policy.

What About Cookies?

We may use cookies and similar tracking technologies to access or store Personal data.

You may refuse the use of cookies by selecting the appropriate settings on your browser. Note however that this may affect your experience of our Website.

Please read our Cookie Policy to understand how we collect data via cookies technology.

How We Share Your Personal Data

We may share your Personal data with the following categories of third parties:

1. Vendors, Consultants, and Other Third-Party Service Providers.

We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such personal data to do that work. Examples include data analysis, email delivery, hosting services, customer service, and marketing efforts. We may allow selected third parties to use tracking technology on the Website, which will enable them to collect on our behalf data about how you interact with the Website over time. This data may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless

described in this Notice, we do not share, sell, rent or trade any of your personal data with third parties for their promotional purposes.

2. Government authorities, auditors, consultants

To fulfill official requests, our tax, and other obligations;

3. Affiliates

We may share data with our affiliates to provide you the Services. Affiliates may include a parent company and any subsidiaries or other companies that we control and/or connected to us and/or that are under common control with us.

Our servers are located in Germany in full compliance with the data protection regulation.

To ensure that the Personal data is safeguarded, stored, and processed in a secured way we use Standard contractual clauses (SCC) adopted by the European Commission as a mechanism to transfer data from the EU countries. Our partners established in countries with an inadequate level of protection of personal data have adopted SCC, as appropriate, to ensure confidentiality, security, and legality of the processing of your personal data.

How We Store Your Personal Data

We store your Personal data as necessary for providing you the Service, compliance of our legal obligations, fulfillment of our legitimate interests, or during the validity of your consent as stated in this Privacy Policy. As soon as information stops serving these purposes we delete it. After you close your account and/or upon your request we will delete and/or anonymize your Personal data without undue delay, but no later than 30 days. We will keep some Personal data that we are allowed or required to maintain, in such cases as:

- If there is an unresolved issue relating to your account, such as an outstanding credit on your account and/or an unresolved claim and/or dispute - we will retain the necessary Personal data until the said issue is resolved;
- Where necessary to comply with legal, tax, audit, and accounting obligations and/or any other legal obligation, we will retain the necessary Personal data for the period required by the applicable law;
- Where necessary to fulfill our legitimate interests such as fraud prevention and/or maintenance of our Users' security.

How We Keep Your Personal Data Safe

We have implemented appropriate technical and organizational security measures designed to protect the security of any Personal data we process and to protect your Personal data from unauthorized access, use, disclosure, alteration or destruction.

For instance, we follow industry leading practices for securing data using secure socket encryption (HTTPS) on transmission and utilizing encryption services provided by Google Cloud.

However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your Personal data, transmission of Personal data to and from our Website is at your own risk. You should only access the services within a secure environment.

What Are Your Rights?

1. ACCESS - You may request a copy of your Personal data and/or the way we store your Personal data.
2. RECTIFY - You may request to change some of your Personal data and/or correct your Personal data if this is inaccurate.
3. ERASURE - You may request to delete all or some of your Personal data, for example, if:
 - they are no longer needed for any processing purposes
 - consent has been used as a legal basis for their processing
 - there is no legitimate interest in the further processing of Personal data
4. OBJECT - You may object to the processing of your Personal data on grounds relating to your particular situation and/or to object processing your Personal data for direct marketing purposes.
5. NO AUTOMATED PROCESSING - You may object to a decision based on automated processing. This means that you may request to review your Personal data manually if you believe that automated processing of your Personal data may not consider your unique situation.
6. DATA PORTABILITY - You may request to provide you a copy of your Personal data in a structured, commonly used, and machine-readable format (e.g. xml, csv). Furthermore, you have the right to request to transmit the said Personal data directly to another controller.
7. COMPLAIN - You have the right to lodge a complaint with a supervisory authority, in particular to the member state of the European Union of your habitual residence, place of work, or place of the alleged infringement.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal data, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

What About California?

California Consumer Privacy Act (CCPA) provides our users who are California residents, with the right to request and obtain from us information about:

- The categories of Personal data we have collected about you;
- The categories of sources from which we collected Personal data;
- The categories of Personal data about you we disclosed for a business purpose or sold;
- The categories of third parties to whom the Personal data was disclosed for a business purpose or sold;
- The business or commercial purpose for collecting or selling the Personal data; and
- The specific pieces of your Personal data we have collected.

If you are a California resident under 18 years old, you may request to remove any content or information you have published or made available on the Website.

We do not sell the data of users under 16 years of age, unless affirmatively authorized, as specified, to be referred to as the right to opt in. The act will prescribe requirements for receiving, processing, and satisfying these requests from consumers. The act will prescribe various definitions for its purposes and would define “personal information” with reference to a broad list of characteristics and behaviors, personal and commercial, as well as inferences drawn from this in

Please contact us by email at privacy@getblock.io to exercise your rights.

Personal Data Breach

A Personal data breach may, if not addressed in an appropriate and timely manner, result in a physical, material, or non-material risk to your rights and freedoms. Therefore, as soon as we become aware that a Personal data breach has occurred, we will notify the Personal data Breach to the Commissioner for Personal data Protection without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless we are able to demonstrate, following the accountability principle, that the Personal data breach is unlikely to result in a risk to your rights and freedoms. Where such notification cannot be achieved within 72 hours, the reasons for the delay should accompany the notification without undue further delay.

What About Minors?

We do not knowingly solicit data from or market to minors without the consent of their parents. For the purpose of this Privacy Policy, a minor means any individual who is under 13 in the United States or under 16 in the European Union (or the minimum legal age to consent to the collection and processing of Personal data where this is different under applicable law).

If we learn that personal data from minors has been collected, we will deactivate the account and take reasonable steps to delete such data from our records unless parental consent is received. Please contact us at privacy@getblock.io if you become aware of any data we have collected from minors or you would like to provide parental consent.

Nothing Lasts Forever

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated ‘REVISED’ date and the updated version will be effective as soon as it is accessible for our users. If we make any updates that affect our user’s privacy significantly, we may notify you directly by sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your data.

COOKIE POLICY

This Cookie Policy is an integral part of the [Privacy Policy](#). Capitalized terms used herein without definition shall have the meanings assigned to them in [Privacy Policy](#). In Cookie Policy, we explain what cookies are and how we use them.

What is a Cookie?

Cookies are files created by websites that you visit. Simply put, it is a technology that allows collecting information about your device, location, and your acts on the websites you visit. We may use cookies and similar technologies (e.g. web beacons, pixels, ad tags, and device identifiers) (“Cookies”) provided by marketing and analytics service providers. We process

Personal data obtained via Cookies for the purposes and on the legal basis described in [Privacy Policy](#).

What Cookies we use and why

1. Strictly Necessary

Strictly necessary Cookies help make the Website usable by enabling basic functions like page navigation and access to secure areas of the website. The Website cannot function properly without these Cookies. For example, your IP address, device info.

2. Preference

These Cookies let us remember your personal settings set up in the past and optimize your experience. For example, it lets us remember what language you prefer, what region you would like, to store product selection on website pages, to provide technical monitoring, and optimize experience.

3. Analytics/ Statistics

Statistics Cookies help us understand how visitors interact with the Website like which pages you visited and which links you clicked on. None of this information can be used to identify you. It is all aggregated and, therefore, anonymized. Their sole purpose is to improve website functions. This includes cookies from third-party analytics services as long as the cookies are for the exclusive use of the owner of the website visited.

4. Marketing

These Cookies are set by Reddit to help build a profile of your interests and to personalize the contents and ads both on and off the Website.

Analytics and marketing Cookies

We use the following analytics and marketing services (“Third-party services”): Google Analytics. Google Analytics allows us to collect and analyze data, helps us improve our Services, and ensure that our Services meet the needs of users. Google Analytics sends us anonymous information about the number of visitors to our Website and the pages they visit.

How to disable Cookies

When you visit our Website for the first time we ask for your consent to use cookies. At this time you may either agree to the use of cookies or manage cookie settings.

You can withdraw or modify your consent to the use of Cookies across all sites at any time following the instructions below:

1. You can use your web browser settings to accept or delete Cookies. To opt-out of Cookies via your browser settings, please use the links: [Google Chrome](#), [Internet Explorer](#), [Mozilla Firefox](#), [Safari](#), [Safari \(mobile\)](#), [Android](#), [Opera](#), [Opera Mobile](#).
2. To opt-out of the most marketing Cookies via [WebChoices](#).
3. To opt-out of the most used Third-party services, please use the following links: [Google Analytics opt-out](#)
4. On your mobile device, your operating system may provide you with additional options to opt out of interest-based advertising or to otherwise reset your mobile identifiers. For example, you may use the “Limit Ad Tracking” setting (on iOS devices) or a setting to “Opt-out of Interest-

Based Ads” (on Android devices) which allows you to limit the use of information about your use of apps for purposes of serving ads targeted to your interests

Note: Disabling Cookies may reduce the quality of your experience on the Websites/ Apps. Irrespective of your choice and/or your device settings, you will continue to see non-customized advertising (e.g. “contextual” advertising) and you may continue to receive personalized ads from third-party ad networks that have obtained your consent on other apps and/or websites.

Changes to Cookie Policy

We may amend Cookie Policy from time to time. We will post any changes in relation to Cookie Policy. By continuing to use our Services you acknowledge that you are familiar with the updated Cookie Policy. We encourage you to review our Cookie Policy before using the Services.

Update: 31 January 2023