GSWIFT.COMMUNITY PRIVACY POLICY
25th September 2024

Introduction

This Privacy Policy describes how Blockchain Entertainment Ventures Ltd., with address at offices of Quijano & Associates (BVI) Limited, Quijano Chambers, P.O. Box 2159, Road Town, Tortola, British Virgin Islands. ('**Blockchain Entertainment**', '**we**', '**our**' or '**us**'), collects and uses your personal data in connection with your use of the Website and the Services.

This Privacy Policy consists of two parts:
• Privacy Notice – which describes how we collect and use your personal data;
• Cookie Notice – which describes how cookies and similar technologies are used.

We provide the Website and the Services subject to the Terms of Service. Please read the Terms of Service before accessing or using the Website and/or the Services.

By using the Website or the Services you agree to data collection, use, and disclosure practices, as well as any other activities described in this Privacy Policy. If you do not agree with the terms of this Privacy Policy, you should immediately discontinue the use of the software and refrain from accessing the Website or the Services.

Definitions

All terms not defined in this Privacy Policy have the meaning as defined in the Terms of Service. Please consult that document to better understand the Privacy Policy. The following terms used in this Privacy Policy have the meaning set forth below:

• **Access Service** – the Access to the Website service as defined in the Terms of Service.

• **Applicable Data Protection Law** – any applicable laws, statutes, regulations, orders, regulatory requirements, bylaws, and other similar legal instruments in force from time to time relating to data protection, data security, privacy, and/or the collection, use, disclosure and/or processing of Personal Data.

• **controller, personal data, processor, processing**, and other terms relating to personal data not defined here – have the meaning as defined in DPA.

• **Blockchain Entertainment** – Blockchain Entertainment Ventures Ltd., with address at offices of Quijano & Associates (BVI) Limited, Quijano Chambers, P.O. Box 2159, Road Town, Tortola, British Virgin Islands.

• **DPA** – Virgin Islands Data Protection Act

• **ICT Systems** – the ICT Systems as defined in the Terms of Service.

• **Privacy Policy** – this Privacy Policy.

• **Services** – the Access Service and the Interface Service.

• **Terms of Service** – Terms of Service for the Website available at https://cdn.gameswift.io/gameswift/shared/tou-gameswift.pdf

• **third party** – a Third-Party as defined in the Terms of Service.

• **Interface Service** – the Interface service as defined in the Terms of Service.

• **Website** – the Website as defined in the Terms of Service.

• **you** – the User as defined in the Terms of Service.

Changes

The Privacy Policy shall be reviewed on an ongoing basis and updated as necessary, for example for legal reasons or to reflect changes in the Terms of Service. The current version of the Privacy Policy has been adopted and is effective as of 25 September 2024.

1. PRIVACY POLICY

1.1. Controller

We, Blockchain Entertainment, are the controller of your personal data to the extent this Privacy Policy applies.

We cooperate with GameSwift DAO, a decentralized autonomous organization consisting of GameSwift community members who are developing $GSWIFT token, an omnitoken that can be transferred between blockchains.

We were engaged by the DAO to develop an interface available on the Website allowing to interact with the blockchain networks. To use some functions of the interface, you must connect a wallet through which the different operations with the blockchain networks are executed.

We do not have control over the blockchain networks or your wallet. We are not a party to any transaction made by you on the blockchain networks. We are not an intermediary, agent, advisor, or custodian in relation to any transaction made via the blockchain networks. We are under no obligation to fulfill any order, authorization issued in relation to any blockchain transaction. Excluding the information collected in accordance with this Privacy Policy, we do not hold any information of any Users, Users' identities, or services beyond what is available or obtainable publicly via the blockchain.

We may engage other entities to assist us in processing your personal data as processors. In such cases we remain responsible for use of your personal data. However, in certain cases such entities may be separate controllers of your personal data. As such they are responsible for use of your personal data. You can find more information about recipients of your personal data in Section 1.7.

1.2. Contact

You can contact us by email at: community@gswift.community or in writing to our registered address: offices of Quijano & Associates (BVI) Limited, Quijano Chambers, P.O. Box 2159, Road Town, Tortola, British Virgin Islands.

1.3. Sources of personal data

We collect your personal data only when it is lawful under the applicable privacy law and only to the extent it is necessary to achieve our purposes (please consult Section 1.5). The Website and the Services are restricted to persons who are at least 18 years of age. We do not knowingly collect personal data from people who are less than 18 years of age in connection with the Website or the Services. If you – the User – are below 18 years old, you may not use or interact with the Website or the Services.

For your convenience and to ensure that this Privacy Policy is intelligible, we have provided additional explanation on what sources of your personal data do we use below:

1.3.1. You & your devices

We collect your personal data from you, both directly, for example when you enter your data when interacting with the Website or the Services, and indirectly, for example from your devices or software such as your website browser.

1.3.2. Third parties

We collect your personal data from third parties, for example in relation with your use of your cryptocurrency wallet. Our Web3 service providers may share some information related to your interactions with blockchain networks and their services, for example in relation to your cryptocurrency wallet. Such information may include personal and/or anonymous data.

1.3.3. Blockchain networks

We collect personal and/or anonymous data from blockchain networks in connection with providing the Services. Such information may include personal and/or anonymous data (please consult Section 1.4.3 for more details).

1.4. Categories of personal data

We use your personal data only when it is lawful under the Applicable Data Protection Law and only to the extent it is necessary to achieve our purposes (please consult Section 1.5). We collect and use the following types of your personal data in connection with your use of the Website and the Services.

1.4.1. Customer support data

The customer support data includes data collected and used in connection with customer support provided by us to you. For example, this may include your communication with us as regards your rights as a User, your participation in our surveys or questionnaires or your other requests, questions, and queries.

1.4.2. Technical data

The technical data includes data collected and used in connection with the ICT Systems. For example, this includes your IP address, information about your operating system or other software used by your device, hardware details, statistics derived from this data and so on. Most of this information is anonymous data. However, in some cases it may be used to identify you, for example in combination with other data. In general, if technical data allows for your identification, we treat it as personal data in compliance with the DPA and other Applicable Data Protection Law.

1.4.3. Web3 data

The Web3 data includes anonymous data and, in some cases, your personal data that we receive in connection with your interactions with our Services, as well as our activity and the activity of third parties connected with rendering the Services. For example, this includes publicly accessible on-chain information (which can be personal data) and limited off-chain information of technical nature, such as a type of a device, browser version and so on (which, as a rule, is anonymous data). This also includes wallet address, which is personal data when we can confirm that such wallet belongs to you, and information we receive from our Web3 service providers, if it can be used by us to identify you. In general, if Web3 data allows for your identification, we treat it as personal data in compliance with the DPA and other Applicable Data Protection Law.

1.5. Purposes and legal grounds of processing

We collect and process your personal data in connection with your use of the Website and the Services. As a rule, we collect your personal data directly from you and from your devices. We process your personal data to the extent necessary to provide the Services, ensure smooth operation of the Website or for other legitimate purposes. You can find the description of such purposes and legal grounds for processing in greater detail below.

1.5.1. Contract performance

We use your personal data to perform contracts we have executed with you subject to the Terms of Service. The legal ground for such processing is the necessity of processing for either taking steps at your request prior to entering into a contract and/or performance of a contract with you. Please consult the Terms of Service for more detailed description of the Services. For your convenience and to ensure that

this Privacy Policy is intelligible, we have provided additional explanation on how we use your personal data in connection with the selected Services below.

1.5.1.1. Access Service

We use your personal data, such as your IP address or other online identifiers, for the purpose of rendering Access Service. For example, this includes providing you access to the contents collected on the Website according to your browser settings.

1.5.1.2. Interface Service

We use your personal data to render the Interface Service subject to the Terms of Service. For example, this includes processing your personal data for the purpose of allowing you to interact with blockchain networks to stake tokens or to receive them in an airdrop from a third party. Please note that we are not a party nor an intermediary, agent, advisor, or custodian in relation to any transaction made via the blockchain networks.

1.5.2. Security

We process your personal data to ensure the security and safety of the Website and our ICT systems and to manage them. This includes detection of malware, bugs, possible exploits, virus screening, attacks, unlawful or malicious actions, IT security threats detection and prevention and so on. For example, we record some of your personal information in system logs (a special computer program used for storing a chronological record containing information about events and actions related to the ICT Systems used for rendering Services by us). This also includes fraud detection and prevention. The legal ground of the processing is our legitimate interest, which consists of our need to ensure security and safety of our ICT systems used in connection with the Website and the Services.

1.5.3. Compliance

We use your personal data to ensure compliance with the applicable law. For example, this includes processing of your personal data to comply with consumer protection law (if applicable). We also process your personal data to comply with the DPA, for example when you submit your request as regards your privacy rights or for accountability purposes. The legal ground for processing is the necessity of processing for compliance with appropriate legal obligation under applicable statutory law.

1.5.4. Legal rights

We may process your personal data, if necessary, to establish and assert claims or to defend against claims. The legal ground for such processing is our legitimate interest, which consists of the protection of our legal rights.

1.6. Data storage

We store your personal data only as long as necessary for the purposes we collected it. This means that the duration of storage depends on the purpose of processing. For example, we store your personal data for the period when we provide you the Services in accordance with the agreement, we have entered with you subject to the Terms of Service. We store personal data processed based on legitimate interest(s), our or those of a third party, until you lodge an effective objection to such processing. Similarly, when we process your personal data based on your consent, we store it until you withdraw your consent. After the end of the period of data storage, we permanently delete or anonymize your personal data.

The duration of storage or use of your data may be extended in certain situations. For example, we may store your personal data after you terminate the agreement with us when required by law. We may also continue to store and use the same dataset if we use it for a different purpose and on a different legal basis, if admissible by law. For example, if you terminate the agreement with us, we may continue to use personal data provided by you in connection with your use of the Services when necessary to establish and assert possible claims or to defend against claims (if we have a legitimate interest to do so).

Please note that it may be technically impossible, depending on a blockchain protocol, to delete or change any information recorded on-chain in a public blockchain network due to the nature of the blockchain technology. As the blockchain technology operates on a decentralized network, we don't have any control over such networks as we are not a party to any transaction made by you on the blockchain networks. We are not an intermediary, agent, advisor, or custodian in relation to any transaction made via the blockchain networks. We are under no obligation to fulfill any order, authorization issued in relation to any blockchain transaction. However, we prioritize transparency and provide you with relevant information about the potential risks associated with using blockchain technology in the Terms of Service.

1.7. Data recipients

As a rule, we do not share your personal data unless it is necessary. For example, we may share your personal data in connection with the provision of the Services under the Terms of Service.

We may disclose your personal data to the following categories of recipients:

• data storage providers;
• Web3 services providers (e.g. providers of wallets with whom we exchange data);
• blockchain network participants;
• external developers or software solution providers;
• our affiliates, subsidiaries, and - in case of a merger, acquisition, or reorganization – an involved third party;
• public authorities - where required by law and subject to the statutory conditions and limitations;
• professional advisors, such as lawyers, accountants, and tax advisors.

We require our partners to keep your data secure and confidential under the terms that ensure a level of protection essentially equivalent to that described in this Privacy Policy. Some of our partners may be located in other countries, for example in the United States. Please consult Section 1.8 for more details on transfers of your personal data.

Please note that some of them act on our behalf as our processors and some act as independent controllers of your personal data. If they are controllers of your data, relevant privacy policies and terms and conditions of such controllers may apply. We encourage you to consult such documents before using such services. We are not responsible for the privacy policies and practices of the third parties.

Please note that your use of the blockchain networks in connection with the Services, depending on the blockchain protocol, may result in recording some of your personal data on the blockchain. This means that your personal data could be identified directly, when combined with other data, or when anonymous data is de-anonymized. As a result, third parties may potentially access your personal data. Please note that we are not a party nor an intermediary, agent, advisor, or custodian in relation to any transaction made via the blockchain networks.

1.8. Data transfers

The level of protection for the personal data in other countries differs from that provided by the British Virgin Islands law. For this reason, we transfer your personal data outside only when necessary and with an adequate level of protection, primarily by cooperating with processors of the personal data in countries for which there has been a relevant decision finding an adequate level of protection for the personal data. If you want to learn more about these safeguards, obtain a copy of them or learn where they have been made available, contact us (please consult Section 1.2).

1.9. Requirement to provide personal data

In some cases, provision of your personal data is mandatory by law or necessary to carry out your request or to perform a contract we have with you. If you don’t provide us with your personal data in such situations, we may not be able to carry out your request, perform a contract with you (or enter into it) or comply with the law. In some cases, this may mean that we will terminate the contract or stop our engagement with you. For example, if you do not provide your personal data necessary for the complaint procedure, we may not be able to handle your complaint. In other cases, provision of your personal data is voluntary. If you don’t provide us with your personal data in such situations, we may not be able to carry out your request or achieve our goal. For example, if you do not share your contact details with us, we may not be able to contact you.

1.10. Your rights

To exercise your right(s) contact us (please consult Section 1.2).

Depending on where you live, you may have different privacy rights. For example, if the EU law applies to you, you have the following rights under the GDPR described below. Please

note that it may be technically impossible, depending on a blockchain protocol, to delete or change any information recorded on-chain in a public blockchain network due to the nature of the blockchain technology. As the blockchain technology operates on a decentralized network, we don't have any control over such networks as we are not a party to any transaction made by you on the blockchain networks. We are not an intermediary, agent, advisor, or custodian in relation to any transaction made via the blockchain networks. We are under no obligation to fulfill any order, authorization issued in relation to any blockchain transaction. However, we prioritize transparency and provide you with relevant information about the potential risks associated with using blockchain technology in the Terms of Service.

1.10.1.Right to access information

You can request from us information about the processing of your personal data. You can also request a copy of your personal data that we process from us free of charge. However, under certain conditions set out by the Applicable Data Protection Law, we may charge a fee for that.

1.10.2.Right to correct your data

You can request that we rectify your personal data that we use, for example, when it is inaccurate. You can also complete your data if it is incomplete.

1.10.3.Right to be forgotten

You can request that we erase your personal data under certain conditions prescribed by law. However, this is not an absolute right, and it does not apply in certain conditions, for example, when use of your data is necessary for the establishment, exercise, or defense of legal claims by us.

1.10.4.Right to restrict

You can request that we stop processing your personal data, except for storage, under certain conditions prescribed by law. However, this is not an absolute right, and it does not apply in certain conditions, for example when use of your data is necessary for the protection of the rights of another natural or legal person.

1.10.5.Right to data portability

You can request that some of your personal data is provided to you, or to another controller, in a commonly used and machine-readable format. This right applies where we use your data based on your consent or a contract and if the processing of your data is carried out by automated means.

1.10.6.Right to withdraw consent

You have the right to withdraw your consent to the processing of your personal data. You can do this at any time. If you withdraw consent, we will stop using your personal

data where the basis for processing is consent. Withdrawal of consent does not affect the lawfulness of processing your data based on consent before withdrawal. The right to withdraw consent applies only to the extent that your personal data is processed based on consent.

1.10.7.Right to object

You have the right to object to the processing of your personal data based on legitimate interest(s), our or those of a third party. You can do this at any time. If you raise an objection, we will stop using your personal data where the basis for processing is our legitimate interest. In exceptional circumstances, we may continue to use your data despite your objection. This exception does not apply when you object to the processing of data for direct marketing purposes, i.e., if you object to it, we will stop processing your personal data on this basis.

1.10.8.Right to lodge a complaint

You can lodge a complaint with the supervisory authority dealing with the protection of personal data. You can lodge such a complaint with your local data protection authority.

2. COOKIE NOTICE

2.1. What are cookies?

Cookies are small text files installed on your device that collect information which, as a rule, facilitates use of the Website and the Services. For example, cookies may remember your language preferences or other settings of your Internet browser. In most cases information used in connection with cookies is personal data. In such cases, the Privacy Notice applies to such personal data.

2.2. What cookies are used?

The following types of cookies are used in connection with your use of the Website and the Services.

2.2.1. Necessary cookies The necessary cookies are the type of cookies that are required by the Website and the Services to function properly. For example, these types of cookies are installed to enable basic features such as page navigation. They are mandatory because they are necessary for the provision of the Website and the Services.

2.3. How long are the cookies used?

The duration for which the cookies are used depends on their type and purpose. In general, there are two main types of cookies: session cookies and persistent cookies. Session cookies expire at the end of a given session. Persistent cookies are stored for a longer

period on your device. They don’t expire at the end of a given session. The maximum period after which our cookies expire is 12 months.

2.4. Your rights

You can manage cookies through your Internet browser, for example by removing all or some cookies from your device or by blocking them. This applies only to cookies used in connection with the Website or the Services which are available online through the Internet browser. Please note that this may cause the Website or the Services to not work properly or at all. To manage cookies through your Internet browser, you should consult instructions provided by the provider of such a browser. For example, you can find some of such instructions for relevant Internet browsers on the websites of their developers: Microsoft (Internet Explorer, Edge), Google (Chrome), Apple (Safari), Mozilla (Firefox), Opera (Opera).

Where your personal data is used in connection with cookies, you have the rights described in the Privacy Notice and can exercise them accordingly. Please consult Section 1.10 of the Privacy Notice for more details.