

# slow.trade Privacy Policy

Last updated: December 2018

We are delighted that you have chosen to use our Platform. We take our data protection responsibilities with the utmost seriousness and we have designed our site so that you may navigate and use it without having to provide Personal Data.

This Privacy Policy (the “**Policy**”) sets out what Personal Data we collect, how we process it and how long we retain it. This Policy is applying to all of our processing activities where we act as a data controller.

In this Policy, "we", "us" and "our" refers to d.ex OÜ, a company incorporated in Estonia under company registration No. No. 14553524 with its registered address at Ahtri 12, Kesklinna District, 10151 Tallinn, Harju County, Estonia. For more information about us, see the Contact Us section of this policy.

In this Policy, “Personal Data” means any information relating to you as an identified or identifiable natural person (“**Data Subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

In this Policy, “Processing” means any operation or set of operations which is performed on Personal Data (as defined in this Privacy Policy) or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Capitalized terms used but not defined here have the respective meanings given to them in the [Terms and Conditions](#).

## 1. NAVIGATING THIS POLICY

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## 2. YOUR INFORMATION AND THE BLOCKCHAIN

- 2.1. Blockchain technology, also known as distributed ledger technology (or simply “DLT”), is at the core of our business. 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 close to impossible 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 cloud computing system), and that there is no centralized place where it is located either.
  - 2.2. Accordingly, by design, a blockchain’s records cannot be changed or deleted and is said to be ‘immutable’. This may affect your ability to exercise your rights such as your right to erasure (‘right to be forgotten’), or your rights to object or restrict Processing, of your personal data. Data on the blockchain cannot be erased and cannot be changed. Although smart contracts may be used to revoke certain access rights, and some content may be made invisible to others, it is not deleted.
  - 2.3. In certain circumstances, when interacting with the DutchX Decentralised Trading Protocol (the “**Protocol**”) as further defined in the Terms such as delivery of tokens it will be necessary to write certain personal data, such as your Ethereum or other cryptocurrency wallet address, onto the blockchain; this is done through a smart contract and requires you to execute such transactions using your wallet’s private key.
  - 2.4. In most cases, the ultimate decision to (i) transact on the Ethereum Blockchain using your Ethereum or other cryptocurrency wallet address, as well as to (ii) share the public key relating to your Ethereum or other cryptocurrency wallet address with anyone (including us) rests with you.
  - 2.5. **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. THE ETHEREUM BLOCKCHAIN IS AVAILABLE TO THE PUBLIC AND ANY PERSONAL DATA SHARED ON IT WILL BECOME PUBLICLY AVAILABLE.**
3. **HOW WE USE PERSONAL DATA**
    - 3.1. **When visiting our website**
      - 3.1.1. We may collect and process Personal Data about your use of our website. This data may include:
        - 3.1.1.1. the browser types and versions used;
        - 3.1.1.2. the operating system used by the accessing system;
        - 3.1.1.3. the website from which an accessing system reaches our website (so-called referrers);
        - 3.1.1.4. behaviour: subpage, duration, and revisit;
        - 3.1.1.5. the date and time of access to our website;
        - 3.1.1.6. the Internet protocol address (“**IP address**”);
        - 3.1.1.7. the Internet service provider of the accessing system; and
        - 3.1.1.8. any other similar data and information that may be used in the event of attacks on our information technology systems.

- 3.1.2. This Personal Data may be processed in order to deliver the content of our site correctly, to optimize the content of our site to ensure the long-term viability of our information technology systems and website technology, and to provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.
  - 3.1.3. The legal basis for this processing is our legitimate business interests, namely monitoring and improving our website and the proper protection of our business against risks and your consent when agreeing to accept [cookies](#).
- 3.2. When using slow.trade
  - 3.2.1. Slow.trade is a graphical interface and trading platform (the “Platform”), that helps you interact via a Wallet with the DutchX Decentralized Trading Protocol for ERC-20 tokens (the “DutchX Protocol”).
  - 3.2.2. When submitting trades via the slow.trade Platform we may collect and process Personal Data. The data will be stored in different instances.
    - 3.2.2.1. On the Ethereum Blockchain following data will be stored:
      - 3.2.2.1.1. your wallet address;
      - 3.2.2.1.2. trade data (timestamp, sell and bought token (amount and kind));
      - 3.2.2.1.3. Liquidity contribution (OWL detection, liquidity contribution settled in OWL, MGN generated, liquidity contribution reduction based on MGN and liquidity contribution settled in participating Supported Tokens).
    - 3.2.2.2. **The data will be stored on the Ethereum Blockchain. Given the technological design of the Ethereum Blockchain, as explained in Section 2, this data will become public and it will not likely be possible to delete or change the data at any given time.**
    - 3.2.2.3. Furthermore, we will store log data which include:
      - 3.2.2.3.1. the Internet protocol address (“IP address”); and
      - 3.2.2.3.2. browser description.
    - 3.2.2.4. This Personal Data may be processed in order to deliver the functionality of the product. The legal basis for this Processing is that it is necessary to fulfil a contract with you and our legitimate business interests, namely monitoring and improving our service.
- 3.3. Other uses of your Personal Data
  - 3.3.1. We may process any of your Personal Data where it is necessary to establish, exercise, or defend legal claims. The legal basis for this Processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
  - 3.3.2. Further, we may process your Personal Data where such Processing is necessary in order for us to comply with a legal obligation to which we

are subject. The legal basis for this Processing is our legitimate interests, namely the protection and assertion of our legal rights.

#### 4. USE OF THIRD PARTY APPLICATIONS

##### 4.1. Ethereum Blockchain

- 4.1.1. When participating in the DutchX Protocol via the slow.trade Platform, your Wallet address, trade data, and liquidity contribution will be stored on the Ethereum Blockchain. See Section 2 of this Policy.
- 4.1.2. **The data will be stored on the Ethereum Blockchain. Given the technological design of the blockchain, as explained in section 2, this data will become public and it will not likely be possible to delete or change the data at any given time.**

##### 4.2. Wallet provider

- 4.2.1. As further set out in the Terms & Conditions, to use the slow.trade Platform to trade on the DutchX Protocol, you will have to connect with your Wallet. Recommended Wallets are listed in the Terms & Conditions and may change from time to time. Wallet providers may collect and store Personal Data. For example, data collected by MetaMask may include:
  - 4.2.1.1. network information;
  - 4.2.1.2. the first wallet address created through the MetaMask plugin;
  - 4.2.1.3. interaction with the site is also documented via a MetaMask Google Analytics account.
- 4.2.2. If you have chosen highest browser permission settings for your web browser, this could also lead to procurements of more Personal Data.
- 4.2.3. For further information and the applicable data protection provisions of MetaMask, please visit <https://metamask.io/privacy.html>.
- 4.2.4. Please check the privacy policy of **your** allet provider before injecting to the slow.trade platform.

##### 4.3. Amazon Web Server

- 4.3.1. We use the Amazon Web Server (AWS) to store, log and database data as described in Section 3.2 c). For further information and the applicable data protection provisions of AWS please visit [https://aws.amazon.com/privacy/?nc1=f\\_pr](https://aws.amazon.com/privacy/?nc1=f_pr).

##### 4.4. API

- 4.4.1. For information purposes, we note here that the DutchX Protocol offers a range of additional Services, including the provision of an Application Programming Interface site ("API") at <https://dutchx.d.exchange/api>, which offers anyone easy access to the **public** information contained on the Ethereum Blockchain regarding the DutchX Protocol.
- 4.4.2. The API enables everyone to access the information of the DutchX Protocol smart contracts including:
  - 4.4.2.1. balances of the users for the different tokens, including locked MGN;
  - 4.4.2.2. information about the tokens listed on the DutchX Protocol and the ones that generate MGN;
  - 4.4.2.3. information about the auctions: sell volumes, buy volumes, start dates, closing prices; and

- 4.4.2.4. information about the deposits, sell orders, buy orders, liquidity contribution level applied, dates, and
- 4.4.2.5. address of the trade, as well as information about the claiming and generation of MGN.

## 5. **SHARING YOUR PERSONAL DATA**

- 5.1. We may pass your information to our Business Partners, administration centres, third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing our services to you.
- 5.2. In addition, when we use any other third-party service providers, we will disclose only the Personal Data that is necessary to deliver the service required and we will ensure, via contractual obligations that these require them to keep your information secure and not to use it for their own direct marketing purposes.
- 5.3. In addition, we may transfer your Personal Data 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 to comply with any legal obligation. However, we will take steps to ensure that your privacy rights continue to be protected.

## 6. **TRANSFERRING YOUR DATA OUTSIDE OF THE EU**

- 6.1. The log data collected when using our service will be stored in our Amazon Web Server, which is based in the US. Amazon is certified under the EU- US Privacy Shield.
- 6.2. **As explained above in this Policy, the Ethereum Blockchain is a global decentralised public network and accordingly any personal data written onto the Ethereum Blockchain may be transferred and stored across the globe.**

## 7. **EXISTENCE OF AUTOMATED DECISION-MAKING**

- 7.1. We do not use automatic decision-making or profiling when Processing Personal Data.

## 8. **DATA SECURITY**

- 8.1. We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.
- 8.2. 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.

## 9. **YOUR RIGHTS AS A DATA SUBJECT**

- 9.1. You have certain rights under applicable legislation, and in particular under Regulation EU 2016/679 (General Data Protection Regulation or “**GDPR**”). We explain these below. You can find out more about the GDPR and your rights by accessing the [European Commission's website](#).

### 9.2. **Right Information and access**

- 9.2.1. You have a right to be informed about the Processing of your Personal Data (and if you did not give it to us, information as to the source) and

this Policy intends to provide the information. Of course, if you have any further questions you can contact us on the above details.

### **9.3. Right to rectification**

- 9.3.1.** You have the right to have any inaccurate Personal Data about you rectified and to have any incomplete Personal Data about you completed. You may also request that we restrict the Processing of that information.
- 9.3.2.** The accuracy of your information is important to us. If you do not want us to use your Personal Data in the manner set out in this Policy, or need to advise us of any changes to your Personal Data, or would like any more information about the way in which we collect and use your Personal Data, please contact us at the above details.

### **9.4. Right to erasure (right to be 'forgotten')**

- 9.4.1.** You have the general right to request the erasure of your Personal Data in the following circumstances:

- 9.4.1.1.** the Personal Data is no longer necessary for the purpose for which it was collected;
- 9.4.1.2.** you withdraw your consent to consent based Processing and no other legal justification for Processing applies;
- 9.4.1.3.** you object to Processing for direct marketing purposes;
- 9.4.1.4.** we unlawfully processed your Personal Data; and
- 9.4.1.5.** erasure is required to comply with a legal obligation that applies to us.

- 9.4.2.** **However, when interacting with the Ethereum Blockchain, as explained above in this Policy, it will likely not be possible to erase and permanently delete Personal Data which has been written onto the Ethereum Blockchain. In these circumstances, we will use our reasonable endeavors to ensure that all personal data held by us is permanently deleted however, notwithstanding this, your right to erasure may not be able to be fully enforced.**

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

- 9.4.3.1.** exercising the right of freedom of expression and information;
- 9.4.3.2.** complying with a legal obligation under EU or other applicable law;
- 9.4.3.3.** the performance of a task carried out in the public interest;
- 9.4.3.4.** archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- 9.4.3.5.** the establishment, exercise, or defence of legal claims.

### **9.5. Right to restrict Processing and right to object to Processing**

- 9.5.1.** You have a right to restrict Processing of your Personal Data, such as where:
- 9.5.2.** you contest the accuracy of the Personal Data;
- 9.5.3.** where Processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed Personal Data;

- 9.5.4. we no longer need to process your Personal Data but need to retain your information for the establishment, exercise, or defence of legal claims.
- 9.5.5. You also have the right to object to Processing of your Personal Data under certain circumstances, such as where the Processing is based on your consent and you withdraw that consent. This may impact the services we can provide and we will explain this to you if you decide to exercise this right.
- 9.5.6. **However, when interacting with the Ethereum Blockchain, as explained above in this Policy, it will not likely be able to prevent external parties from Processing any Personal Data which has been written onto the Ethereum Blockchain. In these circumstances we will use our reasonable endeavors 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.**
- 9.6. **Right to data portability**
  - 9.6.1. Where the legal basis for our Processing is your consent or the Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, you have a right to receive the Personal Data you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.
- 9.7. **Right to freedom from automated decision-making**
  - 9.7.1. As explained above, we do not use automated decision-making, but where any automated decision-making takes place, you have the right in this case to express your point of view and to contest the decision, as well as request that decisions based on automated Processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.
- 9.8. **Right to object to direct marketing ('opting out')**
  - 9.8.1. You have a choice about whether or not you wish to receive information from us.
  - 9.8.2. We will not contact you for marketing purposes unless:
    - 9.8.2.1. you have a business relationship with us, and we rely on our legitimate interests as the lawful basis for Processing (as described above);
    - 9.8.2.2. you have otherwise given your prior consent (such as when you download one of our guides).
  - 9.8.3. 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 or choosing a similar opt-out option on any forms we use to collect your data. You may also opt-out at any time by contacting us on the below details.



**9.8.4.** Please note that any administrative or service-related communications (to offer our services, or notify you of an update to this Policy or the Terms and Conditions , etc.) will solely be directed at our clients or business partners, and such communications generally do not offer an option to unsubscribe as they are necessary to provide the services requested. Therefore, please be aware that your ability to opt-out from receiving marketing and promotional materials does not change our right to contact you regarding your use of our site and Platform or as part of a contractual relationship we may have with you.

**9.9. Right to request access**

**9.9.1.** You also have a right to access information we hold about you. We are happy to provide you with details of your Personal Data that we hold or process. To protect your Personal Data, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us on the above details.

**9.10. Right to withdraw consent**

**9.10.1.** 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.

**9.11. Raising a complaint about how we have handled your Personal Data**

**9.11.1.** If you wish to raise a complaint on how we have handled your personal data, you can contact us as set out above and we will then investigate the matter.

**9.12. Right to lodge a complaint with a relevant supervisory authority**

**9.12.1.** If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Data Protection Commissioner under the Data Protection Act, which is presently the Estonian Data Protection Inspectorate - Andmekaitse Inspektsioon ("AI"). You may contact the AI on the below details:

Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon)

Väike-Ameerika 19

10129 Tallinn

Estonia

Tel. +372 6274 135

Fax +372 6274 137

e-mail: [info@aki.ee](mailto:info@aki.ee)

website: <http://www.aki.ee/en>

**9.12.2.** 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, if that is based in the EEA.

**10. STORING PERSONAL DATA**

**10.1.** We retain your Personal Data only for as long as is necessary for the purposes for which we process the information as set out in this Policy.



- 10.2.** 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.

**11. CHANGES TO THIS PRIVACY POLICY**

- 11.1.** We may make changes to this Policy from time to time. Where we do so, we will notify those who have a business relationship with us or who are subscribed to our emailing lists, if any, directly of the changes, and change the 'Last updated' date above. We encourage you to review the Policy whenever you access or use our site 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 Site and Platform.

**12. OUR DETAILS**

- 12.1.** This website is owned and operated by d.ex OÜ. We are registered in Estonia under Company registration No. 14553524, and our registered office is located at Ahtri 12, Kesklinna District, 10151 Tallinn, Harju County, Estonia.
- 12.2.** If you have any queries concerning your rights under this Privacy Policy, please contact us at [dataprotection@slow.trade](mailto:dataprotection@slow.trade).