

# TALENT PROTOCOL PRIVACY POLICY

## 1. Introduction

This is a description of how your personal data is collected, used and deleted while you visit our website [www.talentprotocol.com](http://www.talentprotocol.com) , register your account and use our services.

The Controller of your personal data is non-profit association **Talent Protocol MTÜ**, registry code 80600292, address Narva mnt 5, Tallinn, Estonia (“we”, “us”).

## 2. How do we get the personal information?

The personal information we process is provided to us directly by you in order to register your account to our Platform as User and also when you buy tokens. The data you insert during the registration is necessary in order to identify you and to create an account.

As a purchaser you may act as a private person or legal entity. Please note that personal data protection legislation applies to private persons and only partly to legal entity representative’s data.

In addition, we may also collect your personal data indirectly. When visiting our website, we and our service providers may collect certain data using tracking technologies like cookies, web beacons and similar technologies. In a more detailed description on our website cookie banner.

Indirectly collected data may fall under the terms of third-party privacy policies while they act as independent data controllers. Please read those separately.

## 3. What kind of data is processed and why?

Processing activity	Data categories	Purpose	Legal basis
Information provided by users	All information provided by users	User profile	Legitimate interest
Website and related service maintenance and quality	IP address of the device, Device screen size, Device type (unique device identifiers), Browser information, Geographic location (country only)	Providing the web Platform, Cookies and Sessions	Contract
Web visitor analytics	Online identifiers (including cookie identifiers and IP addresses)	Website visitor statistics	Consent
Newsletters and offers	Name, E-mail address	Marketing	Consent

## 4. Sharing your personal data

Any data you provide will not be publicly displayed or shared to other Users. Our team and business partners have access to personal data to the extent necessary for the performance of their work duties.

We use third party processors to help provide our service.

## Why and with whom we share your personal data?

Categories of Recipients	Reason for sharing
Service providers	We work with service providers that work on our behalf which may need access to certain personal data to provide their services to us. These companies include those we have hired to operate the technical infrastructure that we need to provide service and assist in protecting and securing our systems and services. For more detailed information about our service providers, please contact us on Talent Protocol Discord.
Payment providers	For paid services you interact directly to payment service providers available on our Platform, who process your data as data controllers and thus their privacy notice applies.
Advertising partners	We work with advertising partners to enable us to customize the advertising content you may receive. These partners help us deliver more relevant ads and promotional messages to you, which may include interest-based advertising (also known as online behavioral advertising), contextual advertising, and generic advertising (Google Ads, Facebook Ads). We and our advertising partners process certain personal data to help us understand your interests or preferences so that we can deliver advertisements that are more relevant to you.

### *International transfers*

Some of our processing is cloud based so your personal information might be sent outside the European Economic Area. In such instances we will ensure that the transfer of your personal data is carried out in accordance with applicable privacy laws and that appropriate contractual, technical, and organisational measures are in place.

## 5. Ensuring the security of personal data

We have taken necessary technical and organizational security measures to protect your personal data against accidental or unlawful destruction, loss or alteration and against the unauthorized disclosure, abuse or other processing in violation of applicable law.

This includes: Identity and access management; Preventing unauthorized viewing of personal data; deliberately set password requirements; structurally safe network design; encryption system; data loss prevention (DLP); offline storage backup and other relevant continuously updated security measures.

## 6. Your rights and preferences

Under data protection law, you have rights including:

- 1) *Right to be informed and to access.* You may get information regarding your personal data processed by us.
- 2) *Right to data portability.* You have the right to receive your personal data from us in a structured, commonly used and machine-readable format and to independently transmit those data to a third party.

- 3) *Right to erasure.* You have the right to have personal data we process about you erased from our systems if the personal data are no longer necessary for the related purposes.
- 4) *Right to object and restrict.* You have the right to object to the processing of your personal data and restrict it in certain cases.
- 5) *Right to rectification.* You have the right to make corrections to your personal data.
- 6) *Right to withdraw consent.* When you have given us consent to process your personal data, you may withdraw said consent at any time.

To exercise any of the abovementioned rights, please contact Talent Protocol on Discord. We will respond to your requests within 30 days.

## **7. Other important information**

### *Newsletter and direct marketing campaigns*

With your explicit consent, we may send you our newsletter and marketing offers. You may opt out of these messages. Please note that email marketing messages include an opt-out mechanism within the message itself (e.g. an unsubscribe link in the emails we send to you). Clicking on the link in an email will opt you out of further messages. You may also opt-out on your account settings in case this option is available. We may also use social media tools to market our products and services. As social media and web analytics providers act as joint processors, there might be consent or opt-out requirements also on their side (Google Ads, Facebook Ads).

### *Dispute resolution*

If you have questions or concerns about our use of your personal information, please feel free to contact us on Talent Protocol Discord. You may lodge a complaint to the supervisory authority, the [Estonian Data Protection Inspectorate](#) , [info@aki.ee](mailto:info@aki.ee)

*This Privacy Notice was updated October 2021.*