



BabySamoCoin Privacy Policy

Last updated: 22 November 2021

This BabySamoCoin Privacy Policy explains in detail how we collect, use, disclose, and protect your personal data when you use BabySamoCoin. It also informs you about the choices that you have with respect to your personal data.

Please read this document carefully before submitting your personal data to us.

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1. GENERAL INFORMATION

Here you can find some general information about us and BabySamoCoin.

1.1 What does this Privacy Policy cover? This BabySamoCoin privacy policy (the “**Privacy Policy**”) governs the processing of personal data collected from individual users (“**you**” and “**your**”) through the website <https://www.babysamocoin.com> and the related domain names (collectively, “**BabySamoCoin**”). The Privacy Policy does not cover any other websites, applications or software that integrate with BabySamoCoin or any other third-party products and services (for example, the socials that are linked to from BabySamoCoin or our Discord channel).

1.2 What is BabySamoCoin? BabySamoCoin provides information about trading a meme cryptocurrency built on the Solana Blockchain entitled “Baby Samo coin” and allows you to mint, burn and stake Baby Samo NFTs. Please note that the trading of the cryptocurrency takes place on decentralized Solana exchanges.

1.3 Who is the data controller? BabySamoCoin is owned and operated by Cassandra D’Antico and the Baby Samo Team (“**we**,” “**us**,” and “**our**”).

1.4 Children. BabySamoCoin is not intended for use by persons under the age of 18. Therefore, we do not knowingly collect children’s personal data. If you become aware that a child has provided us with his or her personal data and you are a parent or a legal guardian of the child, please contact us immediately and we will remove the child’s personal data from our systems.

1.5 Term and termination. This Privacy Policy enters into force on the date indicated at the top of the Privacy Policy (“Last updated”) and remains in effect until terminated or updated by us.

1.6 **Amendments.** We reserve the right to change this Privacy Policy from time to time. This may be necessary to address the changes in our business practices, functionalities of BabySamoCoin, applicable laws, regulations, and industry standards. The amended version of the Privacy Policy will be posted on this page. We encourage you to review our Privacy Policy regularly to stay informed. For significant material changes in the Privacy Policy or, where required by the applicable law, we may seek your consent.

2. WHAT DATA DO WE COLLECT THROUGH BABYSAMOCOIN?

Here we explain in detail what personal data we collect from you, for what purposes we use it, what technical data is collected automatically when you use BabySamoCoin, and how we communicate with you.

2.1 **From what sources do we get your personal data?** We obtain your personal data from the following sources:

- **Directly from you:** for example, if you submit your personal data when you contact us;
- **Directly or indirectly through your activity on BabySamoCoin:** when you use BabySamoCoin, we automatically collect technical information about your use of BabySamoCoin; and
- **From third parties:** we may receive information about you from third parties to whom you have previously provided your personal data, if those third parties have a legal basis for disclosing your personal data to us (for example, for transaction facilitation purposes).

2.2 **What personal data do we collect?** We comply with data minimisation principles. This means that we collect only a minimal amount of personal data that is necessary for your use of BabySamoCoin. We use your personal data for limited, specified and legitimate purposes explicitly mentioned in this Privacy Policy. In general, your personal data is used for the purposes of providing you with access to BabySamoCoin, maintaining and improving BabySamoCoin, facilitating transactions, replying to your enquiries, and pursuing our legitimate interests. We do not re-purpose your personal data. This means that we do not use it for any purposes that are different from the purposes for which your personal data was provided. Below, you can find an overview of the types of personal data that we collect, the purposes for which we use it, and the legal bases on which we rely when processing it.

- **Transactions.** When you initiate a transaction on BabySamoCoin, we may have access to certain information about your transaction that is disclosed to use by the Solana Blockchain. We do not have access to your full financial information or personal data; only a part of the information about your transaction is made available to us. Such information is necessary for facilitating your transactions. The legal bases on which we rely are *'performing our contractual obligations'* and *'pursuing our legitimate interests'* (i.e., to administer our business and comply with our legal obligations). We store such data for the time period prescribed by law (at least 7 years).
- **Enquiries.** When you contact us by email, we collect your name, email address, and any information that you decide to disclose in your message. We use such data to respond to your enquiries and provide you with the requested information. The legal bases on which we rely are *'pursuing our legitimate interests'* (i.e., to maintain and grow BabySamoCoin) and *'your consent'* (for optional personal data). We will store this data until you stop communicating with us.

- **Cookies.** When you browse BabySamoCoin, we or our third-party analytics service provider Google Analytics collect your location and cookie-related data. We use such information to analyse the technical aspects of your use of BabySamoCoin, prevent fraud and abuse, and ensure the security of BabySamoCoin. For more information on our use of cookies, please refer to section “Cookies” below. The legal bases on which we rely are ‘*pursuing our legitimate interests*’ (i.e., to analyse our content and protect BabySamoCoin) and ‘*your consent*’. We will store this data as long as analytics records are necessary for our activities or you withdraw your consent (if you have provided one).

2.2 Do we collect sensitive data? We do not collect or use any special categories of personal data (“sensitive data”) from you, unless you decide, at your own discretion, to provide such data to us. Sensitive data refers to your health, religious and political beliefs, racial origins, membership of a professional or trade association, or sexual orientation.

2.3 What happens if you refuse to provide your personal data? If you decide not to provide us with your personal data when we ask for it, we may not be able to perform the requested operation (for example, reply to your enquiries) and you may not be able to use the full functionality of BabySamoCoin. Please notify us immediately if you think that any personal data that we collect is excessive or not necessary for its intended purpose.

2.4 Do we collect analytics data? Yes. When you browse BabySamoCoin, we collect or have access to certain technical analytics data collected from you. Such data includes the following information:

- Your activity on BabySamoCoin (time of visit, pages visited, products viewed, time spent on each page, clicks, scroll depth, interaction with widgets);
- URL addresses from which you access BabySamoCoin;
- Your browser type and version;
- Your operating system;
- Your device details;
- Your other online behaviour; and
- Cookies-related data, as explained in section “Cookies” below.

2.5 For what purposes do we use analytics data? We use your analytics data to analyse what kind of users access and use BabySamoCoin, measure your engagement with BabySamoCoin, see which products are interesting to you, improve our content, develop new products and services, and investigate and prevent security issues and abuse. In most cases, such analytics data is non-personal and it does not allow us to identify you as a natural person. However, some of such data like your IP address may be considered personal data and we will make sure that we have the necessary legal basis for processing such data. When we process your analytics data that is personal data, we rely on the ‘*legitimate interest*’ (i.e., to analyse and improve BabySamoCoin) and ‘*your consent*’ bases.

2.6 Do we keep your feedback? If you contact us, we may keep records of any questions, complaints, recommendations, or compliments made by you and the response. Where possible, we will de-identify your personal data (i.e., we will remove all personal data that is not necessary for keeping such records).

2.7 What happens if we aggregate or de-identify your data? In case your non-personal data is combined with certain elements of your personal data in a way that allows us to identify you as an individual, we will handle such aggregated data as personal data. If your personal data is

de-identified in a way that it can no longer be associated with an identified or identifiable natural person, it will not be considered personal data and we may use it for any legitimate purpose.

3. HOW LONG DO WE STORE YOUR DATA?

Here we explain for how long we keep your data in our systems and how we delete it.

3.1 For how long do we store your personal data? We and our data processors listed in section 4 below store your personal data only for as long as such personal data is required for the purposes described in this Privacy Policy or until you request us to update or delete your personal data, whichever comes first. For more details about the period for which each type of personal data is stored, please refer to section 2.2. After your personal data is no longer necessary for its purposes and we do not have other legal basis for storing it, we will immediately securely delete your personal data from our systems. We do not store any personal data longer than strictly necessary.

3.2 For how long do we store your non-personal data? We retain non-personal data pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include storing non-personal data for the period of time needed for us to examine our business activities, fulfil our contractual obligations, pursue our legitimate interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

3.3 When are we obliged by law to store your personal data? When we are obliged by law to store your personal data for a certain period of time (e.g., for keeping business records), we will store your personal data for the time period stipulated by the applicable law (in most cases, for 7 years) and securely delete the personal data as soon as the required retention period expires.

4. HOW DO WE DISCLOSE YOUR DATA?

Here you can find information about third parties that may have access to your personal data.

4.1 When do we disclose your personal data? We keep your personal data in strict confidentiality. However, if necessary for the intended purpose of your personal data, we will disclose your personal data to entities that provide services on our behalf or support us in our business (our data processors). Your personal data may be shared with entities that provide technical support services to us, such as hosting, payment processing, shipping, and email distribution services. We do not sell your personal data to third parties and do not intend to do so in the future. The disclosure of your personal data is limited to the situations when it is required for the following purposes:

- Ensuring the proper operation of BabySamoCoin;
- Facilitating your transactions;
- Responding to your enquiries;
- Pursuing our legitimate interests;
- Enforcing our rights, preventing fraud, and security purposes;
- Carrying out our contractual obligations;
- Law enforcement purposes; or
- If you provide your prior consent to such disclosure.

4.2 Who has access to your personal data? We choose our data processors carefully and make sure that they ensure an adequate level of protection of personal data that is consistent with this Privacy Policy and the applicable data protection laws. The data processors that will have access to your personal data are:

- Our analytics service provider Google Analytics located in the United States;
- Our web infrastructure and content delivery service provider Cloudflare located in the United States;
- Our hosting service provider HostGator located in the United States; and
- Our independent contractors and consultants.

4.3 Do we transfer your personal data outside the EEA? Yes. If you reside in a country that belongs to the European Economic Area (EEA), some of our data processors are based outside the EEA or other countries where you reside. Therefore, we may need to transfer your personal data outside your country. In case it is necessary to make such a transfer, we will make sure that the country in which our data processor is located guarantees an adequate level of protection for your personal data or we conclude an agreement with it that ensures such protection (e.g., a data processing agreement based pre-approved standard contractual clauses).

4.4 Do we disclose your non-personal data? Your non-personal data may be disclosed to third parties for any purpose as it does not identify you as a natural person. For example, we may share it with prospects or partners for business or research purposes, for improving BabySamoCoin, responding to lawful requests from public authorities or developing new products and services.

4.5 What happens if we receive a legal request? If requested by a public authority, we will disclose information about the users of BabySamoCoin to the extent necessary for pursuing a public interest objective, such as national security or law enforcement.

5. HOW DO WE PROTECT YOUR DATA?

Here you can find information on how we protect your data against breaches.

5.1 What security measures do we use? We implement technical and organisational information security measures that protect your personal data from loss, misuse, unauthorised access and disclosure. The security measures taken by us include secured networks, strong passwords, limited access to your personal data by our staff, anonymisation of personal data (when possible), regular updates, security patching, and carefully selected data processors.

5.2 What happens if a security breach occurs? Although we put our best efforts to protect your personal data, given the nature of communication and information processing technology and the Internet, we cannot be liable for any unlawful destruction, loss, use, copying, modification, leakage, and falsification of your personal data caused by circumstances that are beyond our reasonable control. In case a serious breach occurs, we will take reasonable measures to mitigate the breach, as required by the applicable law. Our liability for any security breach will be limited to the highest extent permitted by the applicable law.

6. HOW CAN YOU ACCESS AND MANAGE YOUR PERSONAL DATA?

Here you can find detailed information about the rights that you have with regard to your personal data and how to exercise those rights.

6.1 What rights do you have? You have the right to control how we process your personal data. Subject to any exemptions provided by law, you have the following rights:

- **Right of access:** you can get a copy of your personal data that we store in our systems and a list of purposes for which your personal data is processed;
- **Right to rectification:** you can rectify inaccurate personal data that we hold about you;

- **Right to erasure ('right to be forgotten):** you can ask us to erase your personal data from our systems;
- **Right to restriction:** you can ask us to restrict the processing of your personal data;
- **Right to data portability:** you can ask us to provide you with a copy of your personal data in a structured, commonly used and machine-readable format and move that personal data to another processor;
- **Right to object:** you can ask us to stop processing your personal data;
- **Right to withdraw consent:** you have the right to withdraw your consent if you have provided one; or
- **Right to complaint:** you can submit your complaint regarding our processing of your personal data.

6.2 How to exercise your rights? If you would like to exercise any of your legitimate rights, please contact us by using our contact details available at the end of the Privacy Policy and explain in detail your request. In order to verify the legitimacy of your request, we may ask you to provide us with an identifying piece of information, so that we can identify you in our system. We will answer your request within a reasonable time frame but no later than 30 days.

6.3 Launching an official complaint? If you would like to launch a complaint about the way in which we handle your personal data, we kindly ask you to contact us first and express your concerns. After you contact us, we will investigate your complaint and provide you with our response as soon as possible (no later than 30 days). If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with your local data protection authority.

7. COOKIES

In this section, we explain what cookies we use and you can manage them.

7.1 What are cookies? A cookie is a small piece of data typically consisting of letters and numbers. When you visit a website, that website may send a cookie to your browser. As a result, the browser may store the cookie on your computer or mobile device for some time (cookie expiration date depends on its type). Cookies are used to recognise your device and collect certain information about your use of websites. Thus, over time, cookies allow websites to “remember” your actions and preferences. There are several types of cookies: (i) persistent cookies that remain valid until deleted by you, (ii) cookies that remain valid until their expiration date, and (iii) session cookies that are stored on a web browser and remain valid until the moment the browser is closed. Cookies may also be (i) first-party cookies (set by the original website itself) and (ii) third-party cookies (placed by third-party websites).

7.2 What cookies do we use? We use Google Analytics statistics cookies that allow us to generate statistical reports about how you use BabySamoCoin. Such cookies include:

- The first-party cookie entitled “_ga”. It expires in 2 years. This cookie is used to register a unique user ID that is used to generate statistics on how you use BabySamoCoin. The data is sent to the US.
- The first-party cookie entitled “_ga_#”. It expires in 2 years. This cookie is used by Google Analytics to collect data on the number of times you have visited BabySamoCoin as well as the dates of the first and the last visit. The data is sent to the US.

7.3 Cookies consent. When you visit BabySamoCoin, you may be presented with a cookie consent banner. In the banner, we will ask you to provide us with your consent to our use of all cookies. If

you do not provide your opt-in consent for all our cookies, we will serve you our essential technical cookies only. Please note that we may not be able to provide you with the best possible user experience on BabySamoCoin if not all cookies are enabled.

7.4 How to manage cookies? When we ask you to provide your consent to our use of non-essential cookies, you have the freedom not to provide such consent. If you would like to refuse our use of non-essential cookies later, you can do it at any time by declining cookies in your browser or device. For more information, you can consult the cookie management instructions of your browser:

- **Apple** **Safari:**
<https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- **Google Chrome:** <https://support.google.com/chrome/answer/95647>
- **Firefox:** <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- **Opera:** <https://blogs.opera.com/news/2015/08/how-to-manage-cookies-in-opera/>
- **Microsoft** **Edge:**
<https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>

7.5 Google Analytics. We use Google Analytics, a web analytics service provided by Google LLC, registered at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google”). Google generates statistical information by means of cookies and creates reports about your use of BabySamoCoin. The cookies served by Google are anonymous first-party cookies that do not allow us to identify you in any manner. The information generated by cookies will be transmitted to and stored by Google on servers in the United States. To ensure your privacy, your IP address will be anonymised and Google will not combine your IP address with other information Google holds about you. Thus, Google will not be able to identify you. In certain cases (e.g., when required by law or when third parties conduct services on behalf of Google), Google may transfer the information to third parties. For more information about Google Analytics’ privacy practices, please visit <https://support.google.com/analytics/answer/6004245>. If you would like to opt out from Google Analytics, you can do so by installing a Google Analytics opt-out browser add-on available at <https://tools.google.com/dlpage/gaoptout?hl=en>.

7.6 Targeted advertising. You may encounter targeted interest-based advertising based on your use of BabySamoCoin and other websites on the Internet. Where necessary, we will seek your consent. You can control how such advertising is shown to you or opt-out from targeted advertising by consulting the guide powered by the Digital Advertising Alliance available at <https://youradchoices.com>. For more information on opting-out from advertising features on your device, please visit <https://www.networkadvertising.org>.

8. CONTACT

If you have any questions about this Privacy Policy, your rights, or our data protection practices, please contact us by using the following contact details:

Email address: babysamocoin@gmail.com

Postal address: [To be updated soon]

[END]