

# MoA: Privacy Policy

LAST UPDATE: Jul 15, 2019

## 1.Introduction

We, [Edenchain.io](https://edenchain.io), and its subsidiaries and affiliates (“we,” “us,” or “our”), sincerely believe that your privacy is important. You have entrusted us with your information, and we are committed to respect and protect your privacy.

To fulfill our commitment, we will adhere to the following principles:

1. We will inform you of the personal information that will be collected, and, where appropriate seek your consent to collect, process, use, or disclose your personal information.
2. We will identify the purposes for which we will collect and further process your personal information.
3. We will only collect information that is necessary to carry out the identified purposes of use.
4. We will use or disclose your personal information only for the purposes for which it has been collected, except with your consent, or as required or permitted by applicable law, and we will retain your information only as long as necessary to fulfill those purposes.
5. We will endeavor to ensure that your personal information is accurate, complete, and up-to-date.
6. We will implement appropriate technical and organizational measures to protect your personal information.
7. We will make our policies and practices for the handling of your personal information as transparent as is reasonably possible.
8. You will have access to your personal information and will be able to correct your personal information as appropriate in accordance with your rights under applicable law.
9. We will be accountable to you. We are interested in hearing your opinion regarding our compliance with these principles, this Privacy Policy, and applicable laws.

Due to the inherent transparency of many blockchains, including the Ethereum Blockchain, transactions that individuals broadcast via our Services may be publicly accessible. This includes, but is not limited to, your public sending address, the public address of the receiver, the amount sent or received, and any other data a user have chosen to include in a given transaction. Information stored on a blockchain may be public, immutable, and difficult or even impossible to remove or delete. Transactions and addresses may reveal information about the user’s identity and information can potentially be correlated now or in the future by any party who chooses to do so, including law enforcement. Users are encouraged to review how privacy and transparency on the blockchain works.

## **2. Scope of This Privacy Policy**

### **a. Purpose of This Privacy Policy**

This Privacy Policy explains how we will process and safeguard your personal information, and the rights and choices you have with respect to your personal information. This Privacy Policy applies to: personal information you provide us when you use any services or features of Edenchain's Dorothy, MoA, and dApps; personal information we collect when you visit websites maintained by us relating to our services. These Terms and Conditions will be governed and implemented by the laws of the British Virgin Islands. We will consult with you in good faith to resolve any disputes arising out of or relating to the use of Services.

## **3. Types of Personal Information We Collect**

### **a. What Personal Information Does Edenchain Collect?**

When you create an account and use Services, we collect, use, and transfer the following types of information:

#### **i. Information Concerning Your Account**

When you create an account in order to access the Services (an "Account"), we may ask you to provide your phone number. This information is necessary because we may send a text message via SMS to the phone number you provide, as part of our ongoing efforts to detect and deter unauthorized or fraudulent use of or abuse of Services. We may also use your registered phone number to provide you important information about Services.

#### **ii. Device Information and Access Logs When You Use Our Service**

When you use Services, we may obtain and maintain certain electronic identification or log data that is automatically provided by your device such as: device type, OS type, IP address, browser information including type and language settings, device identifier, cookie data, advertising identifier or mobile application identifier.

This information is necessary as part of our ongoing efforts to detect and deter unauthorized or fraudulent use of, or abuse of, Services, as well as to provide you with customized options, and optimize the Service for your device. Also, please note that a third party advertising identifier may be associated with your Account through our internal identifier.

### **b. What Other Information Might Edenchain Collect?**

To improve the quality of Services, we may add and provide additional functionalities. They may include the ability to access your Account from multiple devices, help you find friends via the Service, and to make Services more efficient, usable and enjoyable. If you choose to use such functionalities, we may ask you to

provide additional information. You may choose not to provide the following information, however, if you do so, there may be cases where you cannot use some parts of Services.

#### **4. How We Use and Handle Your Information**

To provide Services and any Additional Services, we, as a data controller or joint data controller, use your personal information for the following purposes in accordance with this Privacy Policy:

■for developing, providing, and improving our Services:

- to provide Services and any Additional Services to you;
- to allow you to use your Account on multiple devices and transfer your Account to another device;
- to enable you to sync other applications offered by us together with your Account and to share information between the applications you use;
- to respond to requests you may make to use Additional Services;
- to enable us to provide customer support, and to respond effectively to your inquiries and claims;
- to conduct user surveys;
- to notify you of any other important information regarding Services and any Additional Services, if necessary;
- to identify winners of promotional contests, to send gifts to those winners, and to deliver purchased products and services;
- to aggregate anonymized statistical data regarding Services and any Additional Services;
- to comply with applicable laws or legal obligations;

■for maintaining the security of Services or preventing unauthorized use:

- to verify your identity;
- to monitor, detect and deter unauthorized or fraudulent use of, or abuse of, Services;
- to verify yourself or to notify you in case any unauthorized use occurred;

■for personalization or advertisement delivery:

- to improve and/or optimize Services and any Additional Services; and
- to measure the effectiveness of advertisements that we place on the Internet or in other media.

If, however, we provide you with a more specific purpose(s) of use either at the time we ask you to provide your personal information or through other means, then such notice will take precedence over the general purposes of use stated in Section 4.a of this Privacy Policy.

In principle, we obtain your consent when we process your personal information. If, however, permitted under applicable laws, we may handle your personal information when any of the following applies:

1. processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;
2. processing is necessary for compliance with a legal obligation to which we are subject (e.g., when following the information disclosure orders based upon laws and regulations announced by government agencies);
3. processing is necessary in order to protect the vital interests of yours or of another individual;
4. processing is necessary to investigate, prevent and take measures against illegal or suspected illegal acts; or
5. processing is necessary for the legitimate interests pursued by us or by a third party, except where such interests are overridden by your privacy-related rights, interests, and freedom (including improvement of operations or systems, prevention of fraud, maintenance of security, marketing, and research performed by us).

## **5. Other Important Information**

### **a. A Special Note about Children in the United States of America or in Europe**

The Service is intended for a general audience and is not directed at or intended to be used by minors under the age of 13 (under the age of 16 in Europe) (“Children”).

We understand the special necessity to protect Children's online privacy, and we do not knowingly collect any personal information from Children.

### **b. Changes to This Privacy Policy**

We may modify our Privacy Policy from time to time for various reasons including to improve our privacy practices, to reflect changes to our Service, and to comply with relevant laws.

When we make any material changes to our Privacy Policy, we will notify you on our Services, or by other reasonable means. We encourage you to review changes carefully. If you agree to the changes, then please continue to use our Service. If, however, you do not agree to any of the changes and you no longer wish to use our Services, you may choose to close your Account. Continuing to use our Services after a notice of changes has been communicated to you or published on our Services constitutes your acceptance of the changes and consent to the modified Privacy Policy. We seek your consent when applicable law requires.