

RARIBLE PRIVACY POLICY

By using the Rarible website, mobile application (the “App”), and services (collectively, the “Services”), you consent to the following privacy policy.

Your right to privacy and control over your personal information is important to us at Rarible. To ensure that you understand how we collect and use personal data as part of the Services, please note the information below.

1. Responsible body

Responsible body for the collection, processing, and use of your personal information through the Services is

Rarible, Inc.
Address: 1209 Orange Street
Corporation Trust Center
Wilmington, DE 19801

Email: privacy@rarible.com

For any questions about privacy in connection with the Services, you can always contact us using the contact information, above.

2. General collection, processing and use of personal data in the context of the use of the App

When you use the Services, we may collect device and browser metadata such as IP addresses, operating system type and version, date and time of access, the URLs of the pages you visited and for how long you visited those pages, any referrer URL, interactions with user interface, the name of your access provider, and analytics information used by Google Firebase, Google Analytics, Facebook, AppsFlyer, Amplitude, items that users like, users that users like, and possibly others.

To the extent we collect this data, we may use it for the following purposes:

- To ensure a smooth connection to the Services;
- To ensure a great user experience of the Services;
- To evaluate system security and stability; and
- For general administrative purposes.

To use the Services, you may be asked to register by providing registration information. In addition, you may be required to register through the App. If you register for any reason, some or all of the following information may be collected:

- First and last name;
- Account username;
- Company;
- Email;
- Telephone;
- Cryptocurrency Wallet address;
- Or other registration-related information.

The registration data is processed for the following purposes:

- To verify your identity and location, and to help us connect you to your historical data and account. By registering and using the Services, you consent to receive follow-up questions and other communication, either from us or from relevant third parties.

Generally, we use the personal information we collect from or about You to provide a smooth and secure access to our website, services, and offerings, to ensure a great user experience, to evaluate system security and stability, and for further administrative purposes.

More specifically, we use and process your personal data to:

- Facilitate purchases and other interactions in the Services;
- Provide customer support;
- Respond to your requests and inquiries;
- Create and manage your account;
- Fulfill orders;
- Track advertising tailored to your interests on the Services and other websites;
- Improve and develop offerings and services;
- Prevent, detect, and respond to illegal or unauthorized activities;
- Communicate with any suppliers we use to perform any of the above; and
- Comply with the law.

The legal basis for the data processing described in this section is your consent, and also the fulfillment of our obligations and provision of Services.

3. Create an account

If you create an account with Rarible for any reason, we may use your name or your email address as your login name. Alternatively, we may use an anonymized login system for your login activity. The creation of an account is required because the Services may not be able to work without historical data. The legal basis of the processing is your consent.

4. Use of the Services

In accessing and using the Services, files and other content might be uploaded or created, and other usage-related data can be created, collected, and processed.

The Services work best when information and content is shared. Thus, if you upload information or content to the Services, you should expect your information or content to be shared with others. We may share your information, including any files or content you provide or create in the Services, provided that those files or content, by their nature, support sharing.

All the information you upload to the Services are stored on an appropriate server infrastructure for processing. Data is typically stored on your mobile device and synced with Google Firebase. Data is stored on servers located in Moscow, Russia until deleted. Presently, data is stored for 10 years, but this may change over time. For any files we keep, we keep them for the sole purpose of giving you and your designated third parties access to the files and data for as long as you need them. During that time, we may view that data to, for example, troubleshoot problems, or to gather anonymized user data.

The legal basis of the processing is your consent.

5. Use of our own Internet cookies

We use cookies on the website. These are small files that your browser automatically creates and displays on your device (laptop, tablet, smartphone, etc.) when you access the Services. Cookies do not harm your device, do not contain viruses, Trojans, or other malicious software. Cookie information is stored, and may result in a connection with a specific terminal or browser being used. This does not, however, mean that we are immediately aware of your identity. The use of cookies serves to increase the usability of the Services. For example, we use session cookies to recognize that you have already visited individual pages, or that you have completed certain tasks or reached certain goals. These are automatically deleted after leaving the Services. In addition, to improve usability, we also use temporary cookies that are stored on your device for a specified period of time, typically 30 days. If you access the Services again, it will automatically recognize that you have already been with us and what inputs and settings you have made, so you do not have to re-enter them. We also use cookies to statistically record the use of the Services, and to evaluate that use for the purpose of optimizing the Services. These cookies allow us to automatically recognize that you have already been with us when you once again access the Services. These cookies are automatically deleted after a defined time. Most browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored on your computer or always provide a hint appearing before a new cookie is created. However, disabling cookies completely may mean that you cannot use all features of the Services.

Most browsers accept cookies automatically but allow you to disable them. You also can opt-out of certain cookies using the following link: <http://optout.networkadvertising.org/?c=1>. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Some features of the Services may not work properly without cookies. To learn more about cookies generally, visit www.allaboutcookies.org and <http://optout.aboutads.info/?c=2&lang=EN>.

Some web browsers (including Safari, Internet Explorer, Firefox, and Chrome) incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a User does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser’s User. Not all browsers offer a DNT option and DNT signals are not yet uniform. Because there is not yet an accepted standard for how to respond to browser DNT signals, we do not currently respond to them. You also can typically remove and reject Cookies or Local Storage from the Services with your browser settings. Many browsers are set to accept Cookies and Local Storage until you change your settings. If you remove or reject Cookies or Local Storage, it could affect how the Services work for you. In all circumstances, we may perform the foregoing information collection practices directly or use a third-party vendor to perform these functions on our behalf. Also, if you access the Website or the Services from a social networking service, we may share information with such social networking service in accordance with this Privacy Policy and to the extent permitted by your agreement with such social networking service and its privacy settings.

We may also use other technologies such as Local Storage and Pixel Tags. “Local Storage” is an industry-standard technology that allows a website or application to store and retrieve data on a person’s computer, mobile phone or other device. We may use device or HTML5 Local Storage, caching or other forms of Local Storage to store your preferences, help us remember certain information about how you interact with the Services or display content on the through the Services based upon what you have viewed on various other websites. We may also use “pixel tags,” “web beacons,” “clear GIFs” or similar means (individually or collectively, “Pixel Tags”) in connection with the Services to collect usage, demographic and geographical location data. A Pixel Tag is an electronic image, often a single pixel, that is ordinarily not visible to you and may be associated with Cookies on your hard drive or Local Storage. Pixel Tags allow us to count the number of users who have visited certain pages or parts of the Services, to deliver branded

services and to help determine the effectiveness of promotional or advertising campaigns. In addition, we may from time to time work with third-party companies, including advertisers, that use Cookies, Local Storage and other tracking technologies to collect non-identifying information about your activities on the Website or the Services in order to help us better understand the use and operation of the Website and the Services. These third parties may collect and analyze information about your online activities over time and across different websites when you access or use the Services. We do not exercise control over these third party websites or services. We encourage you to read the privacy policies or statements of the other websites and services you use. By accepting this Privacy Policy, and by accessing or using the Website or the Services, you are consenting to permit the use of Cookies, Local Storage and Pixel Tags by us and the third-party companies with which we work.

Reasons for using cookie-related technology

Some cookies are required for the Services to operate. Other cookies enable us to track your interests, to enhance your experience while using the Services, or to target advertising.

The types of cookies used in the Services and why they are used is as follows:

- “Strictly necessary” cookies are required to allow us to deliver the Services to you.
- “Performance” or “Analytics” cookies help us to collect information about how Users interact with the Services and help us analyze and improve the Services. Performance or analytics cookies remain on your computer after you close your browser until you delete them.
- “Advertising” cookies are used to make advertising messages more relevant to you. They help to display advertisements that are based on your inferred interests, prevent the same ad from appearing too often and ensure that ads are properly displayed.

By using our cookies, we want to optimize your experience while using the Services. These Services are based on our aforementioned legitimate interests, which at the same time represents the legal basis for the data processing described here.

The App does not use cookies. Rather, it stores the session data in an encrypted keychain.

6. Use of analytics and additional services

We may use web analytics and other services for the continuous optimization of the Services. The tracking provides a statistically accurate record of the use of the Services and to evaluate it for the purpose of optimizing our offerings. From time to time, we employ a variety of data processing and collection services and tools to help us provide you with the best services available. For example, we may use Google Firebase. Note that the list may change from time to time and is provided solely as examples of how we collect data. The legal basis for the data processing described in this section is our authorized interest in the needs-based design and continuous optimization of the Services.

The web analytics and third-party services referred to herein is transmitted to a server in the Moscow, Russia, and stored there. The information is used to evaluate the use of the Services, to compile reports on user activity and to provide other services for the purposes of market research and tailor-made design of Services. This information may also be transferred to third parties if required by law or if third parties process this data in the order.

You can prevent the installation of cookies by setting your software accordingly; however, if you limit or prevent the installation of cookies, some features of the Services may not be fully exploited, or exploited at all. You can prevent the collection by analytics data by opting out of the collection of such data. In that case, an opt-out cookie will be set which will prevent the future collection of your data when you access the Services. If you delete your cookies, you must reset the opt-out cookie again.

Finally, you may be asked to opt into a sharing of your location. Note that if you choose not to share your location the Services may not work with full functionality.

7. Social media plug-ins

We may use Social Plug-ins in the Services from, for example, Facebook, Instagram, Twitter, and LinkedIn to increase awareness of the Services, and for promotional purposes. We are not responsible for activity or content found on those (and any other) third-party sites. Please note that a link to a third-party website or service does not mean that we have reviewed or endorsed its privacy practices. If you visit a third-party website or service, you are subject to its privacy practices and policies, not ours. This privacy policy does not apply to any personal information that you provide to these other websites and services.

8. Server location

The servers on which user data is collected, stored, and used are located in Moscow, Russia. By using the App, you consent to the transmission of your data to the Moscow, Russia.

9. Registration

For all registrations, we use the so-called double opt-in procedure in the European Union only. After registration through the Services, we will send you a notification email asking you to confirm that you wish to receive additional information from Rarible by clicking on a link in that email.

If you no longer wish to receive information via email from us, you can unsubscribe at any time without incurring any costs other than the transmission costs according to the basic rates. You will find an unsubscribe link in any of our emails, and if you chose to unsubscribe, we will then delete your email address from our mailing list. Note that even if you ask us to unsubscribe you, we may still use your email address when you request a password reset.

10. Affected rights for users subject to GDPR

In connection with the data processing presented here, you have the right to:

- Request information about your personal data processed by us. In particular, you can request information on the processing purposes, the category of personal data, the categories of recipients to whom your data has been disclosed, the planned retention period, the right to rectification, deletion, limitation of processing or opposition, the existence of the right to complain, the source of their data, if not collected from us, and the existence of automated decision-making including profiling and, where appropriate, meaningful information about their details;
- Demand the correction of incorrect or complete personal data stored with us;
- Demand the correction or deletion of your personal data stored by us, unless the processing for the exercise of the right to freedom of expression and information, for the fulfillment of a legal obligation, for reasons of public interest or for the assertion, exercise or defense of Legal claims is required;
- Demand the restriction of the processing of your personal data. Dispute the accuracy of the data that the processing is unlawful, or whether we continue need the data. You can exercise a defense of your legal claims where you have objected to the data processing in accordance with Art. 21 GDPR;
- Receive your personal data provided to us in a structured, standard, and machine-readable format or to request transmission to another person responsible;
- Revoke your once given consent to us at any time. As a result, we are not allowed to continue the data processing based on this consent cancellation.

- Contact the supervisory authority of your usual place of residence or workplace or our Contact branch in Berlin, Germany.

Note that the Services employ Smart Contracts that collect information that is then stored on a Block Chain that we do not control. If you use the Services, you are consenting to allow your information to be cryptographically transmitted and stored on that blockchain, and any deletion or modification of that information (to the extent possible on a blockchain) is governed by the terms of the relevant Smart Contract.

11. Withdrawal and Rights

You have the right to object to the processing of your personal data provided that there are reasons for this arising from your particular situation or the objection is directed against direct mail. In the latter case, you have a general right of objection, which is implemented by us without specifying any particular situation.

You also have the right to revoke a consent once given to us at any time. As a result, we will not continue the data processing based on this consent for the future. By the revocation of the consent, the legality the processing on the basis of the consent until the revocation is not affected.

If you would like to exercise your right to revocation or objection, please send an email to privacy@rarible.com .

12. Registration Data in the European Union

In accordance with GDPR, we use the so-called Double Opt-in method. We will only send you e-mail if you confirm by clicking on a link in our notification e-mail that you are the owner of the given e-mail address. If you confirm your e-mail address, we will save your e-mail address and the time of registration until you unsubscribe. You can unsubscribe from e-mail at any time, except that we may still send you an email if you request a password reset. A corresponding unsubscribe link can be found in every e-mail. A message to the above or in the specified contact information (e.g. by e-mail or letter) is also sufficient. The legal basis of this processing is your consent in accordance with. Art. 6 para. 1 lit of the GDPR.

In our email, we use commercially available technologies that measure the interactions with the e-mail (e.g. opening the e-mail, clicked links). We use this data in pseudonymous form for general statistical evaluations as well as for the optimization and further development of our content and customer communication. This is done with the help of small graphics that are embedded in the e-mail (so-called pixels). The data is collected exclusively pseudonymized and also not linked with your other personal information. Legal basis for this is our aforementioned legitimate interest. Through our e-mail, we want to share content relevant to our customers and better understand what readers are actually interested in. If you do not want us to include your information in our analysis of usage behavior, you can unsubscribe from e-mails or deactivate graphics in your e-mail program by default. The data for the interaction with our e-mails may be stored pseudonymously for 30 days and then completely anonymized.

13. Storage time

As a matter of principle, we store personal data only as long as necessary to fulfill the contractual or legal obligations to which we have collected the data. Thereafter, we delete the data immediately, unless we need the data until the expiration of the statutory limitation period for evidence for civil claims or for statutory storage requirements.

Even after that, we sometimes have to save your data for accounting reasons. We are obliged to do so because of legal documentation obligations which may arise from legal obligations. The deadlines for storing documents are two to ten years.

14. Data security

If you have created an account, access to this account is only possible after entering your personal password. You should always keep your access information confidential and close the browser window when you stop communicating with us, especially if you share your computer with others. In addition, we use SSL (Secure Socket Layer) technology in connection with the highest encryption level supported by your browser. In general, this is a 256-bit encryption. Firebase services encrypt data in transit using HTTPS, and also encrypted in the database. Firebase logically isolates customer data. In addition, we take appropriate technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or total loss, destruction or against unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

Although we take precautions intended to help protect the personal information that we collect and process, no system or electronic data transmission is completely secure. Any transmission of your personal information is at your own risk and we expect that you will use appropriate security measures to protect your personal information.

We may suspend your use of all or part of the Services without notice if we suspect or detect any breach of security. You understand and agree that we may deliver electronic notifications about breaches of security to the email address that you provided to us.

If you create an account, you are responsible for maintaining the security of and the information in your account, including your password.

15. CHILDREN'S INFORMATION

The Services we provide are intended solely for adults and for adult use. We do not knowingly collect any information from children under the age of 13. If a parent or legal guardian becomes aware that his or her child is using our services, or has provided us with any personally identifiable information, he or she should contact us at privacy@rarible.com. If we become aware that a child under 13 has provided us with any personally identifiable information, we will promptly delete such information along with the child's account.

To contact us, you may use the following contact information:

Address: 1209 Orange Street
Corporation Trust Center
Wilmington, DE 19801

Tel.:

Email: privacy@rarible.com

16. CCPA

The California Consumer Privacy Act (CCPA) places obligations on organizations that collect personal information of California consumers.

Your California Privacy Rights

This section provides additional details about the personal information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act or "CCPA."

For more details about the personal information we have collected over the last 12 months, including the categories of sources, please see Section 2 above, titled “**General collection, processing and use of personal data in the context of the use of the App,**” along with relevant other sections. We collect this information for the business and commercial purposes described above. We share this information with the categories of third parties described above (as such term is defined in the CCPA) the personal information we collect. **We do not sell your personal information; and will not sell your personal information without providing you the ability to opt out.** Please note that we do use third-party cookies for our advertising purposes as further described above.

Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of personal information we collect (including how we use and disclose this information), to delete their personal information, to opt out of any “sales” of their personal information that may be occurring, and to not be discriminated against for exercising these rights.

We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

Please note:

- We may not honor part or all of a request you make to exercise your rights under CCPA – for example, certain information we collect is exempt from this California Privacy Notice, such as publicly-available information collected from a government agency. When this occurs and we do not honor your request, we will explain why in our response.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at

Rarible, Inc.
Address: 1209 Orange Street
Corporation Trust Center
Wilmington, DE 19801

Email: privacy@rarible.com

We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

California consumers have the following rights:

- You have the right to request information about the categories and specific pieces of personal information we have collected about you, as well as the categories of sources used to collect the information, the purpose for collecting such information, and the categories of third parties with whom we share such information.
- **We do not sell your personal information, and will not sell your personal information without providing you the ability to opt out.** You have the right to request information about our disclosure for business purposes of your Personal Information to third parties.
- You have the right to request the deletion of your Personal Information.
- You have the right to not be discriminated against for exercising any of these rights.

Change Requests

California consumers may make a request pursuant to their rights under the CCPA by contacting us at the email address or telephone number located in this privacy policy.

17. CHANGES, DOWNLOADING, AND PRINTING

This Privacy Policy is effective as of the date on which it is made available on the site and is effective as of August 2020. As our site evolves and offers become available, or as a result of changes in government or regulatory requirements, it may be necessary to change this privacy policy. The current privacy policy can be retrieved and printed by you at any time on the URL you are currently viewing. You can also download this text in PDF format. To view and print PDF files you need a PDF viewer.