

July 27th 2022

PRIVACY POLICY

Your personal data is primarily processed by **GFX Services Unipessoal Lda.**, (hereinafter “GFX”) with registered office at Pcta. do Junqueiro, N° 3, Loja B 2775-597 Carcavelos, Portugal, acting as a Data Controller for the purposes of the following Privacy Notice. Under certain circumstances the responsibility for data protection and your privacy is shared with one or several other legal entities, either being a GFX affiliate or a third party.

This privacy notice (this “Notice”) outlines how GFX collects, maintains, processes, uses, discloses and protects your personal information. Personal information is any information that directly or indirectly identifies you or by which your identity could be deduced. Protecting your privacy is important to us, and our goal is to maintain your trust and confidence when we handle personal information about you.

This Notice will apply to you if you visit our website at <https://defyme.io> (the “Site”), create an account with us (an “Account”), register for, access or use the GFX app, or when you otherwise do business or make contact with us (the Site, the GFX app, and each of your Accounts are hereinafter collectively referred to as the “Services”).

The Services are intended for use by persons who are at least the age of majority in the jurisdiction where they reside. By visiting our Site, or registering for, accessing or using any of the Services, you affirm (i) are eighteen (18) years of age or older OR a parent or guardian has provided express consent for you to use the Services, (ii) you have the legal capacity to consent to this Notice, and (iii) you agree to the terms of this Notice. If you do not agree to any part of this Notice, you should not use the Site or any of the Services.

WHAT INFORMATION DO WE COLLECT?

GFX collects data to enable us to operate the Services effectively and to provide you with the best experience on the Site and with the Services. You provide some of this data to us directly, such as when you create an Account or otherwise register to use the Services, subscribe to a newsletter, respond to a survey, make an enquiry through our Site, contact us for support, or contact us as a prospective user, vendor, supplier, or consultant. We get some of your data by recording how you interact with our Site and the Services by, for example, using technologies like cookies. We also obtain and process data in the context of making the Services available to you.

You have choices about the data we collect. When you are asked to provide personal data, you may decline. But if you choose not to provide data that is necessary to enable us to make the Services available to you, you may not be able to sign up for an Account or use the Services.

The data we collect depends on the context of your interactions with GFX and the Services and the choices you make (including your privacy settings).

WHY DO WE COLLECT PERSONAL INFORMATION, AND WHAT DO WE DO WITH IT?

We use the data we collect to operate our business and to make the Services available to you. This includes using the data to improve the Services and to personalize your experiences. We may use this data to comply with applicable law and regulations, such as for example complying with know your customer regulations. We may also use the data to communicate with you to, among other things, inform you about your Account, inform you about your transactions, provide security updates, and give you information about the Services. We may also use the data to manage your email subscriptions, improve the relevance and security of our Site, respond to user enquiries, send you periodic marketing communications about the Services, and improve the relevance of our advertising.

EXAMPLES OF SUCH USES INCLUDE THE FOLLOWING:

- Establishing your identity through email verification or third-party provider services;
- Facilitating your transactions;
- Facilitating the creation of your Account;
- Protecting you and other users and GFX from error and fraud;
- Analyzing your use of the Services to help make the Service better for all users;
- Carrying out GFX’s regular business activities related to the Services;
- Communicating with you regarding your Accounts and/or Service(s);

- Complying with legal and regulatory requirements;
- Responding to your inquiries;
- Providing the best possible user experience;
- Improving the Services;
- Providing you with technical support
- Sending periodic emails to provide you with more details about the Services that we think you may want to be aware of;
- Inviting you to participate in contest, promotions, surveys, or other features of the Services;
- Communicating with you, and personalizing your experience with us;

HOW DO WE COLLECT PERSONAL INFORMATION?

We collect personal information directly from you, and we may receive certain personal information about you from third parties and our partners. We collect and update personal information throughout our relationship with you. The relationship begins the first time you visit our Site and continues through termination of your use of the Services. As such, personal information may be collected any time you visit the Site, set up an Account or use the Services, communicate with our customer service team, and any other time you communicate with us.

Each and every time you provide personal information to us through any means, you consent to the collection, use and disclosure of such information in accordance with this Notice. If you do not agree to the gathering of this information, you should not use Services or visit our Site.

COOKIES; PIXELS; BEACONS

GFX uses cookies - tiny data files placed on your device that contain a unique identifier that identify your browser. Cookies allow us to collect information about you as a user, to improve our platform, store preferences and settings, and help with sign-in. While you can manage cookies in your Account's preferences setting, if you disable cookies, you may not be able to use or access some or all of the Services.

Our web pages may contain electronic images known as web beacons (also called single-pixel gifs) that we use to help deliver cookies on our websites and to count users who have visited those websites. We may also include web beacons in our promotional email messages or newsletters to determine whether and when you open and act on them.

In addition to placing web beacons on our own websites, we sometimes work with other companies to place our web beacons on their websites or in their advertisements. This helps us to develop statistics on how often clicking on an advertisement on a GFX website results in a purchase or other action on the advertiser's website.

Finally, the Services may contain web beacons or similar technologies from third-party analytics providers (like, for example, Google Analytics) that help us compile aggregated statistics about the effectiveness of our promotional campaigns or other operations. These technologies enable the analytics providers to set or read their own cookies or other identifiers on your device, through which they can collect information about your online activities across applications, websites or other products.

HOW TO ACCESS AND CONTROL YOUR PERSONAL DATA

You can request a copy of your personal data by sending us an email at data@defyme.io.

You can always choose whether you want to receive marketing communications from us. You can opt out from receiving marketing communications from us by using the opt-out link on the communication, or by visiting your Account settings or sending us an email at data@defyme.io.

We will use reasonable efforts to respond to your request within 14 days, but in all events within 30 days of our receipt of the request. GFX may be limited in its ability to send certain personal data to you.

If you are in the European Union, you can identify the specific authority where to file a complaint or address any questions regarding GDPR, at https://edpb.europa.eu/about-edpb/board/members_en.

DATA RETENTION

We may retain your personal information as long as you continue to use the Services, have an Account with us, as long as necessary to comply with applicable law or regulation or for as long as is necessary to fulfill the purposes outlined in this Notice. You can ask to close your Account by contacting us as described above, and we will delete your personal information on request and as governed by the data erasure section of this Notice.

We may, however, retain personal information for an additional period as is permitted or required under applicable laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

We will retain your personal data for as long as necessary to make the Services available to you, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. Because these needs can vary for different types of data, actual retention periods can vary significantly.

HOW WE SHARE INFORMATION AND THIRD-PARTY SERVICERS

We do not sell or trade your personal information to third parties. We share your personal data with your consent, or as necessary to make the Services available to you. We also share your data with vendors working on our behalf; when required by law or to respond to legal process; when responding to audits; to protect our customers; to protect lives; to maintain the security and integrity of the Services; and to protect our rights or our property.

Companies we have hired to provide cloud hosting services, off-site backups, know your customer verifications, payment processing, fiat and stablecoin hosted wallet provider and customer support may need access to personal data to provide those functions. In such cases, these companies are required to abide by our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose. If you would like to consult a list of our current vendors, or have questions or concerns about the vendors, feel free to contact us at data@defyme.io.

We may disclose your personal data as part of a corporate transaction such as a corporate sale, merger, reorganization, dissolution, or similar event.

Finally, we will access, transfer, disclose, and/or preserve personal data, when we have a good faith belief that doing so is necessary to:

1. Comply with applicable law or respond to judicial orders;
2. Respond to requests from public or governmental authorities, including for national security or law enforcement purposes;
3. Protect the vital interests of our users, customers, or other third parties (including, for example, to prevent spam or attempts to defraud users of our products, or to help prevent the loss of life or serious injury of anyone);
4. Operate and maintain the security or integrity of the Services, including to prevent or stop an attack on our computer systems or networks;
5. Protect the rights, interests or property of GFX or third-parties;
6. Prevent or investigate possible wrongdoing in connection with the Services; or
7. Enforce our Terms of Use.

We may use and share aggregated non-personal information with third parties for marketing, advertising, and analytics purposes.

WHERE WE STORE AND PROCESS PERSONAL DATA; INTERNATIONAL TRANSFERS

Personal data collected by GFX may be stored and processed in Portugal or in any other country where GFX or its affiliates, subsidiaries or service providers maintain facilities. The storage location(s) are chosen in order to

operate efficiently, to improve performance, and to create redundancies in order to protect the data in the event of an outage or other problem. We take steps to ensure that the data we collect is processed according to the provisions of this Notice, and the requirements of applicable law wherever the data is located.

We transfer personal data from the European Economic Area and Switzerland to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. When we engage in such transfers, we use a variety of legal mechanisms, including contracts, to help ensure your rights and protections travel with your data. To learn more about the European Commission's decisions on the adequacy of the protection of personal data in the countries where GFX processes personal data, please visit: https://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

PROTECTION AND SECURITY OF INFORMATION

We make reasonable efforts to protect your personal information using appropriate physical, technological and organizational safeguards. No security is foolproof, and the Internet is an insecure medium. However, we work hard to protect you from unauthorized access, alteration, disclosure and destruction of your personal information collected and stored by us. As such, we have policies, procedures, guidelines and safeguards in place to ensure your personal information is protected. Only authorized employees of GFX have access to your information, and these employees are required to keep the information confidential. Additionally, we periodically review our practices related to collection, storage and use of personal information and how such practices are utilized by our employees, contractors and agents to ensure high levels of protection.

Be aware that non-fungible tokens, virtual currencies, and digital assets are not necessarily truly anonymous. Generally, anyone can see the balance and transaction history of any public digital asset address. It may be possible to match your public digital asset address to other personal information about you and to identify you from a blockchain transaction. This is because, in some circumstances, personal information published on a blockchain (such as your digital asset address and IP address) can be correlated with personal information that we and others may have. This may be the case even if we, or they, were not involved in the blockchain transaction itself. Furthermore, by using data analysis techniques on a given blockchain, it may be possible to identify other personal information about you. You understand that we have no control over whether third parties utilize such techniques to identify you or obtain your personal information, and you agree that we will not be liable to you for any such activities. As part of our security, anti-fraud and/or identity verification and authentication checks, we may conduct such analysis to collect and process such personal information about you. You agree to allow us to perform such practices and understand that we do so.

THIRD PARTY LINKS

GFX's Site and the other elements of the Services may contain links to other sites. The owners of the linked sites are solely responsible for their privacy practices and content. GFX is not responsible and does not endorse or control the content and privacy practices of third-party websites. Anytime you access a third-party website, you will be subject to the terms of their applicable privacy policies and should review them carefully.

CHANGES TO THIS NOTICE

GFX reserves the right to amend this Notice from time to time. The most up to date version will be available on our Site with the most recent version's date listed clearly at the top of the page. Changes are effective at the time we post them on the Site. While GFX may make reasonable attempts to notify active Account and Service holders when this Notice is updated, we nonetheless recommend that you consult this Notice each time you visit our Site or use any of the Services to be assured that you are familiar with the most current version of this Notice.

QUESTIONS, CONCERNS AND COMPLAINTS

If you have questions, concerns or complaints regarding this Notice, the handling of your personal information or GFX's privacy or data protection practices, including but not limited to the use of any service providers outside of Portugal, please contact data@defyme.io. We investigate all complaints and will generally respond within 30 days of receipt of your complaint. If we find a complaint to be justified, we will take all appropriate measures, including, as necessary, amending our policies and practices.

Please note that when you send us a message, you will be providing us with personal information, including your email address, name, and any other information provided in the message. In some cases, additional personal information may be needed in order to answer your questions, concerns or requests. Such information will be handled in accordance with this Notice.