

PRIVACY NOTICE

Effective: July 2021

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1. OVERVIEW

Interpop, LLC, dba InterPop (“**Interpop**,” “**we**,” “**us**,” “**our**”) respects your privacy and are committed to protecting the personal data we hold about you. If you have questions, comments, or concerns about this Privacy Notice or our processing of personal data, please see the bottom of this Privacy Notice for information about how to contact us. Interpop is the data controller of the personal data collected, and is responsible for the processing of your personal data.

This Privacy Notice explains our practices with respect to personal data we collect and process about you. This includes information we collect through, or in association with, our website with a home page located at www.MinterPop.com, our apps that we may provide, our products and services that we may offer from time to time via our website and/or related apps, our related social media sites, or otherwise through your interactions with us (the website, apps, products, services, and social media pages, collectively, the “**Services**”).

Please review the following to understand how we process and safeguard personal data about you. By using any of our Services, whether by visiting our website or otherwise, and/or by voluntarily providing personal data to us, you

acknowledge that you have read and understand the practices contained in this Privacy Notice and the Terms of Service (<https://www.minterpop.com/tos.pdf>). This Privacy Notice may be revised from time to time, so please ensure that you check this Privacy Notice periodically to remain fully informed.

2. PERSONAL DATA WE COLLECT

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal data”). In addition, we may collect data that is not identifiable to you or otherwise associated with you, such as aggregated data, and is not personal data. To the extent this data is stored or associated with personal data, it will be treated as personal data; otherwise, the data is not subject to this notice.

a. Categories of Personal Data We Collect

The types of personal data we collect about you depends on your interactions with us and your use of the Services. We collect the below categories of personal data from our users:

1. **Identifiers**, such as a name, username, social media account handle, online identifier, email address, phone number, government ID for verification purposes (e.g., driver’s license, social security number, passport, national identity card), date of birth (to verify you are 18 or older), public Kukai wallet address, internet protocol (IP) address, device ID, or other similar identifiers.
2. **Payment/financial information**, including public Kukai wallet address.
 - a. Please note that if you choose to purchase Tezos cryptocurrency, our payment processor will collect your payment information (e.g., credit/debit card number, billing address, CVC code and expiration date). Please note that our third-party vendor, Wert (<https://wert.io/>) will collect information to verify your residency (e.g., bank statement, debit/credit card statement, tax document, etc.). Please note that our third-party vendor, Cognito (<https://cognitohq.com/>) will collect information for anti-money laundering (“AML”) and know-your-client (“KYC”) compliance purposes.
3. **Commercial information**, including records of digital artworks (in the form of non-fungible tokens or NFTs) purchased, sold, transferred or considered, bidding history, order activity, or other purchasing or consuming histories or tendencies (e.g. types of digital artwork purchased or sold), or records of Tezos used to purchase digital artworks (including Kukai wallet account balance).
4. **Internet or other electronic network activity information**, including, but not limited to, browsing history, search history, information about how our users use, interact with, and navigate the Services (such as website activity, pages visited, similar clickstream information, browser type and version, operating system).
5. **Visual information**, such as, images or avatars you upload to your profile (if such feature is available), and photos for verification purposes.
6. **Geolocation data**. We use your location to make sure you are eligible to access the digital artworks, the Services. We also use location information to track and understand usage per location. See the section captioned “**Your Choices**” for more information about how to disable or limit the collection of location information.

We will not collect additional categories of personal data other than those categories listed above. If we intend to collect additional categories of personal data, we will provide you with a new notice at or before the time of collection.

b. How We Use Your Personal Data

We collect and process your personal data for the following business and commercial purposes:

1. Providing, predicting, or performing, including maintaining or servicing accounts, providing customer service, processing or initiating orders to purchase or sell digital artwork or access free digital artwork, verifying customer information (including age and residency), and processing payments.
2. Marketing our products and services to you, including sending you messages about the products and services we offer.
 - a. ***Profiling and Automated Decisionmaking.*** Except to the extent personal data is used by our data analytics providers (such as Mixpanel), for analytic and statistical purposes, neither we, nor service providers on our behalf, engage in profiling or automated decision making activities that produce legal and/or similarly significant effects upon you.
3. Communicating with you by email, text message (SMS, MMS), telephone, push notification, and other methods of communication, about products, services, order status, and information tailored to your requests or inquiries.
4. Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with other standards.
5. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
6. Debugging to identify and repair errors that impair existing intended functionality.
7. Undertaking internal research for technological development and demonstration.
8. Undertaking activities to verify or maintain the quality or safety of the Services, and to improve, upgrade, or enhance the Services.
9. Complying with applicable laws, regulations, rules and requests of relevant law enforcement and/or other governmental agencies, or for other purposes, as permitted or required by law, including KYC and AML and other compliance activities.
10. As necessary or appropriate to protect the rights, property, and safety of our users, us, and other third parties.

We will not use the personal data we collected for materially different, unrelated, or incompatible purposes without providing you with notice.

c. How We Obtain Your Personal Data

We collect your personal data from the following categories of sources:

- **Directly from you.** When you provide it to us directly, whether online, by email, or phone, including when you sign-up for MinterPop account or to receive emails, upload information into your account and/or profile, purchase digital artworks, bid on digital artwork, or access or browse digital artworks on the Services, or contact us with requests or inquiries, including without limitation, if you are interested in selling digital artworks through the Services.
- **Automatically or indirectly from you.** For example, through logging and analytics tools, tracking technologies (such as Mixpanel), and as a result of your use of and access to the Services, or through your interactions with us on social media websites.
- **From our Service Providers.** For example, order processing and fulfillment services, payment processors, commercial email providers, data analytics providers (such as Mixpanel), security consultants, fraud detection service providers, web and cloud hosting providers, and other Service Providers we engage.

- **From Third Parties.** For example, the Tezos wallet provider, Kukai (<https://wallet.kukai.app/>), when you create or link your Kukai wallet to your account; and from the OAuth account (Google, Facebook, Twitter, and Reddit) used to create your account.

d. Legal Bases for Processing

We process personal data for, or based on, one or more of the following legal bases:

- **Performance of a Contract.** We may process personal data to enter into, or perform under, the Terms of Service (<https://www.minterpop.com/tos.pdf>) and this Privacy Notice, including processing payment information as part of a purchase or sale and providing customer service and support.
- **Legitimate Interests.** We may process personal data for our legitimate interests, including providing information about our products and/or services; to the extent necessary and proportionate for the purposes of ensuring the security of our network and information; and for administrative, fraud detection, and legal compliance purposes.
- **Compliance with Legal Obligations and Protection of Individuals.** We may process personal data to comply with the law and our legal obligations, as well as to protect you and other individuals from certain harms.
- **Your Consent.** We may process your personal data because you have given us your consent to process it in that manner.

e. Who We Share Your Personal Data With

We share personal data with the following categories of third parties:

- Our Service Providers (further described in the section in this Privacy Notice captioned “**How We Obtain Your Personal Data**”).
- Kukai, the Tezos wallet provider. When you purchase Tezos or use Tezos to play or participate in a match on the Services, Kukai will automatically receive information about your transaction (such as the digital artwork purchased or sold and the cost of the digital artwork). When you purchase Tezos, you share your information with our third-party vendors, Wert (<https://wert.io/>) to process the transactions and Cognito (<https://cognitohq.com>), for AML and KYC compliance purposes, respectively.
- Government agencies or regulations when permitted or required to do so by law; in response to a request from a law enforcement agency or authority or any regulatory authority; and/or to protect the integrity of the Services or our interests, rights, property, or safety, and/or that of our users and others.

Public Tezos Blockchain

Please note that if you choose to transact on the Services with Tezos cryptocurrency, your transaction will be recorded on the public Tezos blockchain. Information on a public blockchain is not truly anonymous. We and others may be able to identify you from a blockchain transaction by linking or associating information on the public Tezos blockchain (e.g., public wallet address, amount paid, timestamp) with personal data we and others may have about you.

f. Cookies, Web Tracking, and Advertising

We, and our data analytics providers (such as Mixpanel), use tracking technologies to collect information about how our users use and interact with the Services, such as what pages are visited most often, how the Services are used and function, or how users navigate the Services. We use this information to understand our audience, for statistical purposes, and to improve the Services and their content.

You may find information about how to opt out of and/or block or reject certain tracking technologies in the section in this Privacy Notice captioned “**Your Choices**”.

3. YOUR RIGHTS REGARDING PERSONAL DATA

You have certain rights regarding the collection and processing of personal data. You may exercise these rights, to the extent they apply to you, by contacting us at the information provided at the end of this Privacy Notice, or by following instructions provided in this Privacy Notice or in communications sent to you.

Your rights vary depending on the laws that apply to you, but may include:

- The right to know whether, and for what purposes, we process your personal data;
- The right to be informed about the personal data we collect and/or process about you;
- The right to learn the source of personal data about you we process;
- The right to access, modify, and correct personal data about you (see the “**Accessing, Modifying, Rectifying, and Correcting Collected Personal Data**” section below for more information);
- The right to know with whom we have shared your personal data with, for what purposes, and what personal data has been shared (including whether personal data was disclosed to third parties for their own direct marketing purposes);
- The right to withdraw your consent, where processing of personal data is based on your consent; and
- The right to lodge a complaint with a supervisory authority located in the jurisdiction of your habitual residence, place of work, or where an alleged violation of law occurred.

a. Accessing, Modifying, Rectifying, and Correcting Collected Personal Data

We strive to maintain the accuracy of any personal data collected from you, and will try to respond promptly to update our records when you tell us the information in our records is not correct. However, we must rely upon you to ensure that the information you provide to us is complete, accurate, and up-to-date, and to inform us of any changes. Please review all of your information carefully before submitting it to us.

Depending on the laws that apply to you, you may obtain from us certain personal data in our records. If you wish to access, review, or make any changes to personal data you have provided to us through the Services, please contact us at the information provided at the end of this Privacy Notice. We reserve the right to deny access as permitted or required by applicable law.

b. Your Nevada Privacy Rights

Nevada law permits our users who are Nevada consumers to request that their personal data not be sold (as defined under applicable Nevada law), even if their personal data is not currently being sold. Requests may be sent to info@interpop.io, and are free of charge.

c. Your European Union and United Kingdom Privacy Rights

In addition to the above-listed rights, privacy laws of the European Union and the United Kingdom provide individuals with enhanced rights in respect of their personal data. These rights may include, depending on the circumstances surrounding the processing of personal data:

- The right to object to decisions based on profiling or automated decision making that produce legal or similarly significant effects on you;

- The right to request restriction of processing of personal data or object to processing of personal data carried out pursuant to (i) a legitimate interest (including, but not limited to, processing for direct marketing purposes) or (ii) performance of a task in the public interest;
- In certain circumstances, the right to data portability, which means that you can request that we provide certain personal data we hold about you in a machine-readable format; and
- In certain circumstances, the right to erasure and/or the right to be forgotten, which means that you can request deletion or removal of certain personal data we process about you.

In addition, we may need to request additional information from you to validate your request. To exercise any of the rights above, please contact us at info@interpop.io.

d. **Your Canadian Privacy Rights**

Residents of Canada are permitted to request and obtain from us information respecting the existence, use, and disclosure of their personal data as well as access to that information (subject to certain exceptions pursuant to applicable laws). Without limiting the above, residents of Canada will, upon request:

- Be informed of whether we hold personal data about you;
- Be provided with an account of third parties to which we have disclosed your personal data;
- Be able to challenge the accuracy and completeness of your personal data and have it amended as appropriate; and
- Be provided with information about our policies and practices with respect to the management of personal data, including: the name or title, and address, of the person who is accountable for our privacy policies and practices; the means of gaining access to personal data; a description of the type of personal data held by us, including a general account of its use; a copy of any brochures or other information that explain our policies, standards, or codes; and what personal data is made available to related organizations.

4. **YOUR CHOICES**

You have choices about certain information we collect about you, how we communicate with you, and how we process certain personal data. When you are asked to provide information, you may decline to do so; but if you choose not to provide information that is necessary to provide some of our Services, you may not be able to use those Services. In addition, it is possible to change your browser settings to block the automatic collection of certain information.

- a. **Communications Opt-Out.** You may opt out of receiving marketing or other communications from us at any time through a given communications channel (such as email or telephone) by following the opt-out link or other unsubscribe instructions provided in any marketing message received.

Note that if you do business with us in the future, you may not, subject to applicable law, opt out of certain automated notifications, such as order confirmations, based on business transactions (e.g., e-commerce).

- b. **Location Information.** If you want to limit or prevent our ability to receive location information from you, you can deny or remove the permission for certain Services to access location information or deactivate location services on your device. Please refer to your device manufacturer or operating system instructions for instructions on how to do this. Note that if you choose to deny or remove access to location information or deactivate location services on your device, you may not have access to certain features or services.

Note that if you choose to purchase an artwork or browse free artwork, you may not opt out of the collection of certain location information, based on legal and compliance purposes.

- c. **Cookies, Web Tracking, and Advertising.** You can adjust your device and/or browser settings to delete and/or block some or all cookies, provide notifications when you receive a new cookie, or prevent the automatic collection of data. Consult the “Help,” “Tools,” or “Preferences” menus on your browser, or the documentation for your device, for more information about how to do this or how to enable “Do Not Track” settings.

5. **PROTECTING PERSONAL DATA**

We use reasonable and appropriate physical, technical, and organizational safeguards designed to promote the security of our systems and protect the confidentiality, integrity, availability, and resilience of personal data. However, no method of safeguarding information is completely secure. While we use measures designed to protect personal data, we cannot guarantee that our safeguards will be effective or sufficient. In addition, you should be aware that Internet data transmission is not always secure, and we cannot warrant that information you transmit utilizing the Services is or will be secure.

6. **RETENTION OF PERSONAL DATA.**

We retain personal data to the extent we deem necessary to carry out the processing activities described above, including but not limited to compliance with applicable laws, regulations, rules and requests of relevant law enforcement and/or other governmental agencies, and to the extent we reasonably deem necessary to protect our and our partners’ rights, property, or safety, and the rights, property, and safety of our users and other third parties.

7. **OTHER IMPORTANT INFORMATION ABOUT PERSONAL DATA AND THE SERVICES.**

- a. **Collection of Personal Data from Children.** The Services are not directed to children below the age of 16, or equivalent minimum age in the relevant jurisdiction. We do not knowingly collect information from children under the age of 16, or equivalent minimum age in the relevant jurisdiction. If you are 16 or older but under the age of 18, or the legal age of the majority where you reside, you must have your parent’s or guardian’s consent to use the Services and your parent or guardian must provide consent to the terms of this Privacy Notice on your behalf. By using the Services, you represent and warrant that you have read and understand the terms of this Privacy Notice and the Terms of Service (<https://www.minterpop.com/tos.pdf>).
- b. **Third-Party Websites and Services.** As a convenience, we may reference or provide links to third-party websites and services, including those of unaffiliated third parties, our affiliates, service providers, and third parties with which we do business. When you access these third-party services, you leave our Services, and we are not responsible for, and do not control, the content, security, or privacy practices employed by any third-party websites and services. You access these third-party services at your own risk. This Privacy Notice does not apply to any third-party services; please refer to the Privacy Notices or policies for such third-party services for information about how they collect, use, and process personal data.
- c. **Business Transfer.** We may, in the future, sell or otherwise transfer some or all of our business, operations or assets to a third party, whether by merger, acquisition or otherwise. Personal data

we obtain from or about you via the Services may be disclosed to any potential or actual third-party acquirers and may be among those assets transferred.

- d. ***Do Not Track.*** We use analytics systems and providers that process personal data about your online activities over time and across third-party websites or online services, and these systems and providers may provide some of this information to us. We process or comply with any web browser's "do not track" signal or similar mechanisms.

Note, however, that you may find information about how to opt out of and/or block or reject certain tracking technologies in the section in this Privacy Notice captioned "**Your Choices**".

- e. ***International Use.*** Your personal data will be stored and processed in the United States. If you are using the Services from outside the United States, by your use of the Services you acknowledge that we will transfer your data to, and store your personal data in, the United States, which may have different data protection rules than in your country, and personal data may become accessible as permitted by law in the United States, including to law enforcement and/or national security authorities in the United States.

8. **MODIFICATIONS AND UPDATES TO THIS PRIVACY NOTICE**

This Privacy Notice replaces all previous disclosures we may have provided to you about our information practices with respect to the Services. We reserve the right, at any time, to modify, alter, and/or update this Privacy Notice, and any such modifications, alterations, or updates will be effective upon our posting of the revised Privacy Notice. We will use reasonable efforts to notify you in the event material changes are made to our processing activities and/or this Privacy Notice, such as by posting a notice on the Services or sending you an email. Your continued use of the Services following our posting of any revised Privacy Notice will constitute your acknowledgement of the amended Privacy Notice.

9. **APPLICABILITY OF THIS PRIVACY NOTICE**

This Privacy Notice is subject to any agreements, including the Terms of Service (<https://www.minterpop.com/tos.pdf>) that govern your use of the Services. This Privacy Notice applies regardless of the means used to access or provide information through the Services.

This Privacy Notice does not apply to information from or about you collected by any third-party services, applications, or advertisements associated with, or websites linked from, the Services. The collection or receipt of your information by such third parties is subject to their own privacy policies, statements, and practices, and under no circumstances are we responsible or liable for any third party's compliance therewith.

10. **ADDITIONAL INFORMATION AND ASSISTANCE**

If you have any questions or concerns about this Privacy Notice and/or how we process personal data, please contact us at info@interpop.io.

If you are located in the European Union, European Economic Area, or the United Kingdom, and you wish to raise a concern regarding our use of your personal data, you have the right to do so with your local supervisory authority.