

# REDEFINE PRIVACY POLICY

Last Updated: April 28, 2022

In order to ensure transparency and give you more control over your personal data, this privacy policy (“**Privacy Policy**”) governs how we, Redefine Technologies Ltd and any of our affiliates and subsidiaries (“**Redefine**”, “**we**”, “**our**” or “**us**”) use, collect and store personal data that we collect or receive from or about you (“**you**”) in connection with <https://redefine.net/> and the services provided therein (the “**Services**”):

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal data. “**Important note**: Nothing in this Privacy Policy is intended to limit in any way your statutory rights, including your rights to a remedy or other means of enforcement.

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Redefine offers an advanced end-to-end risk management solution for DeFi investors. It includes an automated due diligence service and real-time portfolio risk monitoring.

This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement material changes in the way we use your data, in a manner that is different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means and take any additional steps as required by applicable law.

## **1. WHAT DATA WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED**

### **(i) We Process the Following personal data:**

- a. **Data You Provide Directly to Us.** We collect the following data you provide directly to us, including, without limitation, data when you browse and make use of our Services, such as: full name, business name & business address, email address, phone number, wallet details (including wallet addresses and transactions), the activities in the blockchain, as well as any other data that you decide to provide/supply us with when you communicate with Redefine (e.g., via email or website).
- b. **Data from Other Sources.** Redefine may also obtain data about you from other sources, including publicly - or commercially- available data, and through third-party data platforms, partners and service providers.
- c. **Automatic Data Collection.** We may automatically collect certain information through Technologies when you make use of the Redefine Services, such as your Internet protocol (IP) address, cookie identifiers and other device identifiers that are automatically assigned to your device, browser type and language, geo-location data, hardware type, operating system, internet service provider and other data about actions taken through the use of the Redefine Services.

### **(ii) We process data for the following purposes:**

- a. **To provide you with the Redefine Services.** Redefine will use your data to provide its Services (including, without limitation, support, alerts, to make the searches/queries that you instruct us).
- b. **For Administrative Purposes.** Redefine may use your data (i) to respond to your questions, comments, and other requests for customer support, or data, including data about potential or future services; (ii) for internal quality control purposes; (iii) to establish a business relationship; (iv) to generally administer the Redefine Services.
- c. **To Market the Redefine Services.** Redefine may use data to market the Redefine Services. Such use includes (i) notifying you about offers and services that may be of interest to you; (ii) tailoring content, advertisements and offers for you; (iii) developing and marketing new products and services, and to measure interest in Redefine’s services; (iv) other purposes disclosed at the time you provide data; and (v) as you otherwise consent.
- d. **Security purposes.** Some of the above mentioned data will be used for detecting, taking steps to prevent and prosecuting fraud or other illegal activity; to identify and repair errors; to conduct audits; and for security purposes. Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims.
- e. **De-identified and Aggregated Data Use.** In certain cases, we may or will anonymize or de-identify your data and further use it for internal and external purposes, including, without limitation, to analyze and improve Redefine services (including through the use of artificial intelligence) and for research purposes. We may use this anonymous or de-identified Data and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them and/or to develop new product features and improve existing offerings).
- f. **Cookies and Similar Technologies.** We, as well as third parties that provide content, advertising, or other functionality on the Redefine Services, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect data through the Redefine Services. We use Technologies that are essentially small data files placed on your device that allow us to record certain pieces of data whenever you visit or interact with the Redefine Services. If you would like to opt out of the Technologies we employ on the Redefine Services, you may do so by blocking, deleting, or disabling them as your browser or device permits.

## **2. HOW WE PROTECT AND RETAIN YOUR PERSONAL DATA**

- 2.1. **Security.** We have implemented and maintained reasonable technical, organizational and security measures designed to protect your data. However, please note that we cannot guarantee that the data will not be compromised as a result of unauthorized penetration to our servers. As the security of data depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this data.
- 2.2. **Retention of your data.** Your data will be stored until we delete our records, and we proactively delete it, or if you send a valid deletion request. Please note that in some circumstances we may store your data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, and/or (iii) if we reasonably believe there is a prospect of litigation relating to your data or dealings.

## **3. HOW WE SHARE YOUR PERSONAL DATA**

In addition to the recipients described above, we may share your data as follows:

- 3.1. The data Redefine gathers is shared with our partners and other third parties. We may also share data with our affiliated companies about you.
- 3.2. We may use third party service providers to process your data for the purposes outlined above, including, without limitation:
  - 3.2.1. With cloud service providers for hosting purposes;
  - 3.2.2. With websites and web content creation platforms in order to help us manage our Services;
  - 3.2.3. With email providers, marketing, CRM, other similar tool providers;
  - 3.2.4. With analytic companies, in order to help us understand and analyze data we collect in accordance with this policy; and
- 3.3. To the extent necessary, with regulators, courts, banks or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order, as well as for internal compliance procedures and to protect the safety, security, and integrity of Redefine, our Services, customers, employees, property, and the public..
- 3.4. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your data to such third party (whether actual or potential) in connection with the foregoing events (including, without limitation, our current or potential investors). In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your data in connection with the foregoing events.

3.5. Where you have otherwise provided your consent to us for sharing or transferring your data.

#### 4. YOUR PRIVACY RIGHTS

4.1. **Rights:** You can exercise your rights by contacting us at [privacy@redefine.net](mailto:privacy@redefine.net). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we need further information in order to fulfill your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

4.2. **Marketing emails – opt-out:** You may choose not to receive marketing email of this type by sending a single email with the subject "UNSUBSCRIBE" to [privacy@redefine.net](mailto:privacy@redefine.net). Please note that the email must come from the email account you wish to block OR if you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails, and we will process your request within a reasonable time after receipt.

5. **USE BY CHILDREN.** We do not offer our products or services for use by children and, therefore, we do not knowingly collect data from, and/or about children under the age of 18. If you are under the age of 18, do not provide any data to us without the involvement of a parent or a guardian. In the event that we become aware that you provide data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such data, please contact us at [privacy@redefine.net](mailto:privacy@redefine.net)

6. **INTERACTION WITH THIRD PARTY PRODUCTS.** We enable you to interact with third party websites, mobile software applications and products or services that are not owned, or controlled, by us (each, a "Third Party Service"). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

#### 7. ANALYTIC TOOLS/COOKIES

- **Google Analytics.** The Website uses a tool called "Google Analytics" to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with information we collect. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

- **Segment.** Segment's "Connections" Service acts as a central hub for our Data, allowing us to collect our Data from selected sources, such as our own or third-party websites or properties, and send the our Data to chosen destinations, such as our databases or its accounts with third-party applications or services, for further use. We use Segment's by implementing Segment's JavaScript, SDK or other code on our website and/or our services. Segment's ability to use and share information collected by Segment Analytics about your visits to this Website is restricted by the Segment Analytics Terms of Service, available at <https://www.twilio.com/legal/aup>, and the Segment Privacy Policy, available at <https://www.twilio.com/legal/privacy>. You may learn more about how Segment collects and processes data specifically in connection with Segment Analytics at <https://segment.com/legal/msa2021/>

- Through our Services we may allow third party advertising partners to set technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day). We may also combine and share such information and other information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as "interest-based advertising" or "online behavioral advertising". We may allow access to other data collected by the services to share information that may be useful, relevant, valuable or otherwise of interest to you.
- We reserve the right to remove or add new analytic tools, cookies, pixels and other tracking technologies.

#### 8. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

8.1. **Our California Do Not Track Notice:** Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers, but we may allow third parties, such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer's online activities over time and across different websites when a consumer uses the Services.

9. **CONTACT US.** If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [privacy@redefine.net](mailto:privacy@redefine.net).

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