Privacy Policy of ManagerNFT

ManagerNFT collects some Personal Data from its Users.

Owner and Data Controller

Unitos International Holding srl - Str.episcop Augustin Pacha 10 - Timisoara (Rumania)

Owner contact email: company@managernft.io

Types of Data collected

Among the types of Personal Data that ManagerNFT collects, by itself or through third parties, there are: email address; first name; last name; Usage Data; phone number; country; ZIP/Postal code; gender; date of birth; city; physical address; User ID; username; various types of Data; payment info; billing address; shipping address; Tracker; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Data communicated while using the service.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.
Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using ManagerNFT.
Unless specified otherwise, all Data requested by ManagerNFT is mandatory and failure to provide this Data may make it impossible for ManagerNFT to provide its services. In cases where ManagerNFT specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.
Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.
Any use of Cookies – or of other tracking tools — by ManagerNFT or by the owners of third-party services used by ManagerNFT serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through ManagerNFT.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.
The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of ManagerNFT (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, Access to third-party accounts, Social features, Handling payments,

Hosting and backend infrastructure, Interaction with external social networks and platforms, SPAM protection, Collection of privacy-related preferences, Registration and authentication, Registration and authentication provided directly by ManagerNFT, Remarketing and behavioural targeting, Backup saving and management, Analytics and Displaying content from external platforms.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

Facebook permissions asked by ManagerNFT

ManagerNFT may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows ManagerNFT to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the Facebook permissions documentation and to the Facebook privacy policy.

The permissions asked are the following: Basic information, Contact email and Email.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Access to third-party accounts

This type of service allows ManagerNFT to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically, but require explicit authorisation by the User.

Facebook account access (Meta Platforms, Inc.)

This service allows ManagerNFT to connect with the User's account on the Facebook social network, provided by Facebook, Inc.

Permissions asked: Contact email; Email.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

Twitter account access (X Corp.)

This service allows ManagerNFT to connect with the User's account on the Twitter social network, provided by Twitter, Inc.

Personal Data processed: email address; username.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

- a Sale in the United States

Analytics

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

Google Analytics (Universal Analytics)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, (“Google”). Google utilises the Data collected to track and examine the use of ManagerNFT, to prepare reports on its activities and share them with other Google services.
Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out; Ireland – Privacy Policy – Opt Out.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in the United States

Backup saving and management

This type of service allows the Owner to save and manage backups of ManagerNFT on external servers managed by the service provider itself. The backups may include the source code and content as well as the data that the User provides to ManagerNFT.

OVH Storage and backup

OVH Storage and backup is a service to save and manage backups provided by OVH Srl or by OVH GmbH, depending on how the Owner manages the Data processing.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Italy – Privacy Policy; Germany – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

Collection of privacy-related preferences

This type of service allows ManagerNFT to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

iubenda Cookie Solution (iubenda srl)

The iubenda Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information and in particular to the use of Cookies and other Trackers on ManagerNFT.

Personal Data processed: Tracker.

Place of processing: Italy – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

iubenda Consent Solution (iubenda srl)

The iubenda Consent Solution allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.
In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; Tracker.

Place of processing: Italy – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

Contacting the User

Mailing list or newsletter (ManagerNFT)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning ManagerNFT. Your email address might also be added to this list as a result of signing up to ManagerNFT or after making a purchase.

Personal Data processed: city; country; date of birth; email address; first name; gender; last name; phone number; physical address; Usage Data; ZIP/Postal code.

Category of Personal Information collected according to CCPA: identifiers; biometric information; internet information.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana

Contact form (ManagerNFT)

By filling in the contact form with their Data, the User authorises ManagerNFT to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: email address; User ID.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

Phone contact (ManagerNFT)

Users that provided their phone number might be contacted for commercial or promotional purposes related to ManagerNFT, as well as for fulfilling support requests.

Personal Data processed: phone number.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of ManagerNFT and interact with them.
This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Fonts

Google Fonts is a typeface visualisation service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows ManagerNFT to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Handling payments

Unless otherwise specified, ManagerNFT processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. ManagerNFT isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

Coinbase (Coinbase Inc.)

Coinbase is a payment service provided by Coinbase, Inc.

Personal Data processed: billing address; email address; first name; last name; payment info; shipping address; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information.

This processing constitutes:

Payment by bank transfer (ManagerNFT)

In the event that the chosen payment method is a direct bank transfer to the current account indicated by ManagerNFT, the Owner will collect the payment details of the User, i. e. the current account number of the sender, the SWIFT code, the bank and the name of the sender. Such data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data processed: first name; last name; payment info.

Category of Personal Information collected according to CCPA: identifiers; commercial information.

This processing constitutes:

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable ManagerNFT to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of ManagerNFT.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

OVHcloud

OVHcloud is a hosting and backend service provided by OVH Srl or by OVH GmbH, depending on how the Owner manages the Data processing.

Personal Data processed: Usage Data.

Place of processing: Italy – Privacy Policy; Germany – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of ManagerNFT. The interaction and information obtained through ManagerNFT are always subject to the User's privacy settings for each social network.
This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.
It is recommended to log out from the respective services in order to make sure that the processed data on ManagerNFT isn't being connected back to the User's profile.

Facebook Like button and social widgets

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing,

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in the United States

Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Reddit button and widgets (reddit inc.)

The reddit button and widgets are services allowing interaction with the reddit platform provided by reddit inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Registration and authentication

By registering or authenticating, Users allow ManagerNFT to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, ManagerNFT will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Facebook Authentication

Facebook Authentication is a registration and authentication service provided by Meta Platforms, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: Tracker; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Google OAuth

Google OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Google network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in the United States

Registration and authentication provided directly by ManagerNFT

By registering or authenticating, Users allow ManagerNFT to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary

for the provision of the service requested by the Users.

Direct registration (ManagerNFT)

The User registers by filling out the registration form and providing the Personal Data directly to ManagerNFT.

Personal Data processed: email address; User ID; username; various types of Data.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

Remarketing and behavioural targeting

This type of service allows ManagerNFT and its partners to inform, optimise and serve advertising based on past use of ManagerNFT by the User.
This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioural targeting activity.
Some services offer a remarketing option based on email address lists.
Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Twitter Remarketing (X Corp.)

Twitter Remarketing is a remarketing and behavioural targeting service provided by Twitter, Inc. that connects the activity of ManagerNFT with the Twitter advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Facebook Remarketing

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that connects the activity of ManagerNFT with the Facebook advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out; Ireland – Privacy Policy – Opt Out.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

LinkedIn Website Retargeting (LinkedIn Corporation)

LinkedIn Website Retargeting is a remarketing and behavioural targeting service provided by LinkedIn Corporation that connects the activity of ManagerNFT with the LinkedIn advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Social features

Inviting and suggesting friends (ManagerNFT)

ManagerNFT may use the Personal Data provided to allow Users to invite their friends - for example through the address book, if access has been provided - and to suggest friends or connections inside it.

Personal Data processed: various types of Data.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

SPAM protection

This type of service analyses the traffic of ManagerNFT, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognised as SPAM.

Google reCAPTCHA

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.
The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Tracker; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information; inferred information.

This processing constitutes:

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Further information about the processing of Personal Data

localStorage

localStorage allows ManagerNFT to store and access data right in the User's browser with no expiration date.

Push notifications

ManagerNFT may send push notifications to the User to achieve the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for ManagerNFT, some or all of the apps on the particular device.
Users must be aware that disabling push notifications may negatively affect the utility of ManagerNFT.

Preference Cookies

Preference Cookies store the User preferences detected on ManagerNFT in the local domain such as, for example, their timezone and region.

Cookie Policy

ManagerNFT uses Trackers. To learn more, Users may consult the Cookie Policy.

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner’s legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organisation governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Further information for Users in Brazil

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running ManagerNFT and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").
This section applies to all Users in Brazil (Users are referred to below, simply as "you", "your", "yours"), according to the "Lei Geral de Proteção de Dados" (the "LGPD"), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.
This part of the document uses the term "personal information" as it is defined in the **LGPD**.

The grounds on which we process your personal information

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymised personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

Categories of personal information processed

To find out what categories of your personal information are processed, you can read the section titled "Detailed information on the processing of Personal Data" within this document.

Why we process your personal information

To find out why we process your personal information, you can read the sections titled "Detailed information on the processing of Personal Data" and "The purposes of processing" within this document.

Your Brazilian privacy rights, how to file a request and our response to your requests

Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;

- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymised information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

How to file your request

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

How and when we will respond to your request

We will strive to promptly respond to your requests.
In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.
You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.
In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request – except in cases where such communication is proven impossible or involves disproportionate effort on our side.

Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorised by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

Further information for Users in the United States

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running ManagerNFT and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The information contained in this section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).

Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.

- ▶

  ### Identifiers

- ▶

  ### Biometric information

- ▶

  ### Internet or other electronic network activity information

- ▶

  ### Commercial information

- ▶

  ### Inferences drawn from other personal information

ℹ️ You can read the definitions of these concepts inside the "Definitions and legal references section" of the privacy policy.

To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information ("Limit the Use of My Sensitive Personal Information") you can refer to the "Your privacy rights under US state laws" section of our privacy policy.

For more details on the collection of Personal Information, please read the section "Detailed information on the processing of Personal Data" of our privacy policy.

We won't process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use ManagerNFT.

For example, you directly provide your Personal Information when you submit requests via any forms on ManagerNFT. You also provide Personal Information indirectly when you navigate ManagerNFT, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of ManagerNFT and features thereof.

Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;

- **the right to request the deletion of your Personal Information.** You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;
- **the right to opt out from the Sale of your Personal Information;** We will not discriminate against you for exercising your privacy rights.
- **the right to non-discrimination.**

Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- **The right to opt out of the Sharing of your Personal Information** for cross-context behavioral advertising;
- **The right to request to limit our use or disclosure of your Sensitive Personal Information** to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas and Oregon, you have

- **The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- **The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

Additional rights for users residing in Utah

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah, you have

- **The right to opt out of** the processing of your Personal Information for **Targeted Advertising**;
- **The right to opt out of the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

How to exercise your privacy rights under US state laws

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on ManagerNFT.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("GPC"), you are free to do so and we will abide by such request in a frictionless manner.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of ManagerNFT or the related Services.
The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, ManagerNFT may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, ManagerNFT and any third-party services may collect files that record interaction with ManagerNFT (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within ManagerNFT and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User’s consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data) / Personal Information (or Information)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Sensitive Personal Information

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

Usage Data

Information collected automatically through ManagerNFT (or third-party services employed in ManagerNFT), which can include: the IP addresses or domain names of the computers utilised by the Users who use ManagerNFT, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using ManagerNFT who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of ManagerNFT. The Data Controller, unless otherwise specified, is the Owner of ManagerNFT.

ManagerNFT (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by ManagerNFT as described in the relative terms (if available) and on this site/application.

Sale

Sale means any exchange of Personal Information by the Owner to **a third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

Sharing

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioural advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioural advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

Targeted advertising

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer’s activities over time and across nonaffiliated websites or online applications to predict such consumer’s preferences or interests, as defined by the applicable privacy US state law.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User’s device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to ManagerNFT, if not stated otherwise within this document.

Latest update: 25 August 2023