

PRIVACY POLICY 9.0

This Policy was updated on **15 December 2021**.

INTRODUCTION

Welcome to the Dovu Limited's (Dovu) Privacy Policy.

Dovu respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our websites (regardless of where you visit them from) and tell you about your privacy rights and how the law protects you.

You can view an archived version of the previous version of the policy [here](#). If you like to access older versions of this Privacy Policy, please [Contact us](#).

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how Dovu collects and processes your personal data through your use of our websites, including any data you may provide through our websites when you create an account, sign up to our newsletter or take part in a competition or a survey.

This website is not intended for children and we do not knowingly collect data relating to children. If we learn that we have collected Personal Identifiable Information (PII) of a child under 13 years old, we will take steps to delete such information from our files as soon as possible.

CONTROLLER

Dovu Limited, whose principal office is at Bethesda Chapel, Victoria Square, Llanwrtyd Wells, Powys, Wales, LD5 4SS is the controller and responsible for your personal data (collectively referred to as "COMPANY", "we", "us" or "our" in this privacy notice). We are registered as a data controller with the Information Commissioner's Office with number ZA251455.

This privacy policy is issued on behalf of the Group so when we mention "COMPANY", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Group responsible for processing your data. Dovu Limited is the controller and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the data privacy manager using the details set out below.

CONTACT DETAILS

Our full details are:

Full name of legal entity: Dovu Limited

Name or title of data privacy manager: Krasina Mileva

Email address: legal@dovu.io

Postal address: Dovu Limited, Bethesda Chapel, Victoria Square, Llanwrtyd Wells, Powys, Wales, LD5 4SS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow

third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username and password (hashed and encrypted).
- **Profile Data** includes your username and password (encrypted), token transaction history, your interests, preferences, feedback and survey responses (some of which might be collected with your location data only after prior consent, when the purposes of our products and services require so); profile picture.
- **Financial Data** includes the last four digits of debit or credit card details that you provide; the Ethereum Wallet that you use to utilise your DOV tokens within our Platform.
- **Contact Data** includes billing address, mobile phone number and email address.
- **Location Data** includes the Country where you are located at the moment of using our Platform.
- **Transaction Data** includes details of earn, redeem, import and export DOV and cDOV (NFT) tokens to and from you and details of carbon offsetting within our Platform.
- **Technical/Device Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, the type of mobile device you use, your mobile operating system, the type of mobile browser you use, time zone settings and other technology on the devices you use to access this website. All device data information will be stored in aggregated form by Google analytics and Cloudflare.

- **Usage Data** includes details of your use of any of our websites, products and services including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- **Marketing and Communications Data** includes your preferences in receiving marketing from our third parties and us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this privacy notice.

We do NOT collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, email or otherwise. This includes personal data you provide when you:
 - Create an account on our websites and/or applications to use our Platform and services;
 - Subscribe to our service or publications;
 - Request marketing communications to be sent to you;
 - Enter a competition, promotion or survey;
 - Make carbon offset transaction;
 - Report a problem, provide us with feedback; or
 - contact us (we will keep a record of that correspondence).
- **Automated technologies or interactions.** As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Location data:** through your Profile within our Platform, in the circumstances where you have voluntarily provided us with that data.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

Device Data from the following parties:

- Analytics providers including Laravel; and
- **We use analytics providers such as Google Analytics.** Google Analytics uses cookies to collect non-identifying information. Google provides some additional privacy options regarding its Analytics cookies at <http://www.google.com/policies/privacy/partners/>.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we need to confirm whether you are eligible for receiving DOV and cDOV tokens.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

We will only send you direct marketing communications by email if we have your consent. You have the right to withdraw that consent at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including legitimate interest
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<p>To register you as a new Customer or User and verify your account.</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Consent
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> (a) Choose a project and offset your carbon emissions; to receive a Certificate for the offset (b) To process Platform purchases and deliver Services including managing transfers of DOV, cDOV (NFT) or any other native tokens and collecting DOV tokens owed to us. (c) Notifying you about changes to our terms or privacy policy (d) Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction (f) Device and Location (e) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Usage (e) Device (f) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
<p>To deliver relevant website content to you</p> <p>To monitor trends so we can improve our Platform.</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Device (e) Usage (f) Location (g) Technical 	<ul style="list-style-type: none"> (a) Consent (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	(h) Marketing and Communications	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, **you have not opted out of receiving that marketing.**

THIRD-PARTY MARKETING

We strive and have a no sharing personal data policy to any third parties, apart from our Subprocessors, which we use to provide you with the Platform. However, if there is a reason, we will get your express opt-in consent before we share your personal data with any company outside the group of companies for marketing purposes.

OPTING OUT

You can ask us to stop sending you marketing messages at any time by [Contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of product/service experience or other transactions.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when a website sets or accesses cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please visit our [Cookie Policy](#).

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis, which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Information we share when you sign up through a referral, when applicable. If you sign up for our Services through a referral from a friend, we may share information with your referrer to let them know that you used their referral to sign up for our Services, rather than your personal information we hold for you.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We aim to keep your personal data inside the European Economic Area (**EEA**) or the United Kingdom (UK).

Some of our External third parties are based outside the EEA or the UK, so their processing of your personal data might involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA or UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe;
- We do NOT rely on the E.U.-U.S. Privacy Shield framework for the transfer of personal data to the U.S. Where applicable law requires a data transfer legal mechanism, we use one or more of the following: EU Standard Contractual Clauses with a data recipient outside the EEA or the UK, verification that the recipient has implemented Binding Corporate Rules, or other legal method available to us under applicable law.; or
- Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA or the UK.

7. DATA SECURITY

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Any transfer of DOV, cDOV (NFT) or any other native token transactions carried out by us or our chosen third-party provider of processing services will be encrypted using Transport Layer Security technology.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way. We will store the data in External Third Party servers: DigitalOcean LLC and Google Cloud simultaneously. Further details about these External Third Parties can be found in *Glossary*. All data is being stored in the relevant legal entity's UK datacenters. We use industry-standard encryption of passwords, by hashing

the passwords by secure algorithm. Access to all channels containing critical and sensitive information to the database is protected with two-factor authentication (2FA). We use TLS (Transport Layer Security) - traffic to and from our server and user passwords are appropriately encrypted. Company wide policy on Security.

We will collect and store your preferences on your Device using application data caches and browser web storage (including HTML5).

Certain Services might include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *Your legal rights and Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances you have the following rights under data protection laws in relation to your personal data:

Your UK and EU GDPR rights

- **Request access** to your personal data (commonly known as a “Data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental

rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Your CCPA Rights and Choices

As a California consumer and subject to certain limitations under the CCPA, you have choices regarding our use and disclosure of your personal information:

- **Exercising the right to know:** You may request the following information about the personal information we have collected about you:
 - the categories and specific pieces of personal information we have collected about you;
 - the categories of sources from which we collected the personal information;
 - the business or commercial purpose for which we collected the personal information;
 - the categories of third parties with whom we shared the personal information; and
 - the categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.
- **Exercising the right to delete:** You may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.
- **Exercising the right to opt-out from a sale:** You may request to opt out of any “sale” of your personal information that may take place. We do not use, share, rent or sell the Personal Data of our Users’ Customers for interest-based advertising. We do not sell or rent the Personal Data of our Users, their Customers or our Site visitors.
- **Non-discrimination:** The CCPA provides that you may not be discriminated against for exercising these rights.

You can exercise any of these rights at any time by contacting us at **legal@dovu.io**

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [Contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

INTERNAL THIRD PARTIES None

EXTERNAL THIRD PARTIES

Service providers acting as processors based in the United Kingdom and United States of America, who provide IT and system administration services.

Professional advisers acting as processors or joint controllers including lawyers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue and Customs, FCA (Financial Conduct Authority) regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

An up-to-date list of all of our Sub Processors could be found [here](#).

This Privacy Policy will be subject to regular review and may change from time to time.