

# Privacy Notice

This Privacy Notice applies to the website at [www.legacy-nft.com](http://www.legacy-nft.com) (hereinafter referred as the Website) and to processing of personal data related to the operation of the Website and the purpose of this Privacy Notice is to inform the visitors of the Website and users about processing of personal data.

## 1. CONTROLLER

### **D.I.C. Investment Limited**

ID: 1643720

Registered office: Dominion Centre, 43-59 Queen's Road East, Hong Kong  
(hereinafter referred as the Controller)

## 2. PURPOSES AND LEGAL BASES

Controller might collect and process the personal data of Website visitors and users for the following purposes that will be explained in detail below:

- Analysis of the visits and use of the Website and to improve the visitors experience;
- User accounts;
- Sale of NFTs;
- Physical product delivery;
- Exclusive benefits;
- Legacy Coin;
- Business accounting of the Controller;
- Provision of customer support;
- Marketing communication;
- Security and operation of the Website and services;
- Anti money-laundering measures;
- Protection of business interest, processing of claims and complaints;

### 2.1 Website analytics

The Website uses website analytics service for gathering aggregated statistical data about usage of the Website. The Controller uses this data to improve the Website and your user experience and to improve the reach of the services. The Controller uses the Google Analytics and Facebook Pixel services and more information on transfer of persona data can be found in section 3 of this Privacy Notice.

The Website uses cookies that are set up in your browser according to your browser settings. Analytical cookies are stored only with your consent. For more information about cookies please see section 4 of this Privacy Notice.

### 2.2 User accounts

In order to make any purchases or to provide services registering a user account is necessary. Basic identification and authentication information as email address, username and password is required for the registration. For verification of the user account additional information such as providing identification details as name, address, email verification is required. In addition to that user can provide additional information in the user profile menu.

The user account is set up based on your consent provided upon registration of the user account. However, be aware that maintaining a user account is required for provision of certain services according to the Terms and Conditions.

### **2.3 NFT marketplace**

The Controller uses the Website for sale of NFTs and to allow users to sell their NFTs. In order to process orders and deliver the NFTs certain personal information might be collected. The Website uses Metamask or other cryptocurrency wallet to identify users and to make deliveries of NFTs. For fulfilling orders information about orders, auctions, bids, purchased NFTs, price, payments in cryptocurrencies and transactions must be processed and in some cases such information is cached by the Website. This information reflects the information that will eventually be publicly available in the blockchain of the respective cryptocurrencies and NFTs. In addition to this information identification details, billing details and payment information is also required in order to process the sales of NFTs. Information about the sales of NFTs will also be stored in the user profile.

This data is necessary to negotiate the contracts and to fulfil the contracts on sale of NFTs concluded through the Website.

### **2.4 Physical product delivery**

When user purchases a product that includes a physical item additional information such as address, telephone, delivery details and details about payment of the delivery costs is necessary for making the delivery of the physical items to the customer.

This data is necessary to negotiate the contracts and to fulfil the contracts that include delivery of physical products concluded through the Website. If the required information is not provided, then it might not be possible to make the delivery of the physical product.

### **2.5 Exclusive benefits**

If the purchased NFT provides access to some exclusive benefits some additional information might be required in order to provide such benefits. The extent of information required depends on the actual nature of the benefit and details are provided via the Website or User account and in general might include social media or other contact, identification details, schedules etc. In relation with certain benefits the information might shared with third persons participating in organisation of the benefit and with the respective personality.

This data is necessary to fulfil the contractual obligations related to provision of exclusive benefits. If the required information is not provided, then it might not be possible to provide the exclusive benefits.

### **2.6 Legacy Coin**

User might participate in Legacy Coin loyalty program by purchasing, receiving Legacy Coin and spending Legacy Coin.

Information regarding purchase, awards and spending of Legacy Coins is processed to fulfil the contractual obligations arising out of participation in Legacy Coin loyalty program. Participating in the program is voluntary, however if the user chooses to participate in the program the related personal data is processed without consent based on the related contractual obligations.

### **2.7 Accounting**

Controller as legal entity is obliged to keep standard business accounting that might include information about trades and provision of services. For purposes of keeping business accounting information about NFTs sales and provision of services including price, payments in cryptocurrencies, identification of the purchasers and receipt or invoices is collected and kept by the Controller.

Processing of this data is necessary to comply with regulatory obligations of the Controller and is kept for the statutory archiving period that might be as long as 10 years.

## **2.8 Customer support**

Controller provides a customer support through the published e-mail contact address. In order to provide the customer support the messages sent to the Controller including any information disclosed this way are processed by the customer support team to provide the required assistance.

This data is processed based on legitimate interest of the Controller and customer in resolving the customer support issues. The data processed in relation to providing customer support is stored until the support issue is resolved and for 6 months afterwards.

## **2.9 Marketing communication**

If the user subscribes to the Controller's marketing channel, then the Controller might send the customer an e-mail or contact him or her via telephone from time to time with recent news, information about new products and services and other relevant information about the Controller and its business.

The user is included in the marketing communication channels based on his or her consent. The e-mail address will be kept in the mailing list until the user opts-out of the mailing list. The option to opt-out is offered in every message.

## **2.10 Security and operation of the Website and services**

For the proper and secure provision of services and operating of the Website, it is necessary to collect and process certain technical data, including IP address, parameters of the browser used or the storage of cookies.

Such processing is carried out in accordance with the legitimate interests of the Controller and the users in safe and proper provision of the requested services.

## **2.11 Anti money-laundering measures**

The Controller reserves right to set up certain measures to minimize risks of money-laundering and terrorism financing, that might include the obligations to establish and verify identity of the purchaser of NFT and perform client due diligence. In relation with such measures, information about identity of the purchaser, purposes of transaction or proof of funds might be requested by the Controller.

Personal data processed by the Controller are processed to fulfil the legitimate interest of combating money laundering and financing of terrorism and to protect the Controller from possible investigations by public authorities and under certain conditions Controller might be obliged to collect such information under relevant legislation. Any collected information will be kept for as long as 10 years.

## **2.12 Protection of business interest, processing of claims and complaints**

Any data collected and processed by the Controller might be used to protect the Controller from claims, to enforce claims of the Controller or third parties and to settle disputes and complaints.

Processing pursuant this purpose is based on legitimate interest of the Controller or third parties to protect its business interests, enforce its claims and defend against claims of third persons and to settle disputes and complaints.

## **3. TRANSFERS OF PERSONAL DATA**

Any data collected and processed by the Controller is kept secure and in confidentiality. The Controller shall never sell your data to third parties without your express consent. The data might be shared with third parties where it is a statutory obligation of the Controller and where the Controller uses third party services to outsource part of the processing to processors. The processors are selected with diligence and are bound to protect the data under data processing contracts.

In general, the Controller employs the following categories of processors:

- accounting, tax and legal advisers;
- IT infrastructure services (cloud computing, webhosting, e-mailing service etc.);
- payment service providers;
- web analytics services;
- helpdesk service;
- mass emailing service providers;
- contractors (e.g. customer support operators);

In connection with the provision of exclusive benefits personal information might be shared with third persons participating in organisation of the benefit and with the respective personality. Such third parties act as independent controllers.

Following section covers the most important service providers that might process personal data as processors.

### **3.1 Google Analytics Service**

The Controller uses the Google Analytics services for the Website analytics. Google Analytics service is provided by Google LLC a company established in the USA. The Controller has concluded a data processing contract with the Google LLC based on the standard contractual clauses approved by the European Commission.

Follow these links in order to find out more about the Google Analytics service and how the Google LLC handles the data:

- [Google LLC Privacy Notice](#);
- [Google Analytics Data Processing Terms](#);

### **3.2 Facebook Pixel**

The Website uses Facebook Pixel retargeting tool. This tool is used to track redirects from Facebook ads for statistical purposes and effectiveness of Facebook (Meta) advertising. Data collected in this way is anonymous to the Controller but it is stored and processed by Facebook. The Controller has concluded a data processing contract with the Facebook (Meta) based on the standard contractual clauses approved by the European Commission.

Follow these links in order to find out more about the service and how the Facebook (Meta) handles the data:

- [Facebook Privacy Notice](#);

### **3.3 Wyre**

The Controller provides users an option to buy cryptocurrencies on the third party cryptocurrency marketplace. For convenience certain details from the personal profile and information about connected wallet might be shared with the third party in order to facilitate the trade. The Controller has concluded a data processing contract with the Wyre based on the standard contractual clauses approved by the European Commission.

Follow these links in order to find out more about the Wyre service and how the Wyre handles personal data:

- [Wyre Privacy Policy](#);

### **3.4 Veriff**

Controller uses Veriff's service in order to process user accounts verification and to handle Anti money-laundering measures including identification of the user and carrying user due diligence. The Controller has concluded a data processing contract with the Veriff based on the standard contractual clauses approved by the European Commission.

Follow these links in order to find out more about the Veriff service and how the Veriff handles personal data:

- [Veriff Privacy Policy](#);

### **3.5 Leadhub**

Controller uses Leadhub's services to run email marketing campaigns and related activities. The Controller has concluded a data processing contract with the Leadhub.

Follow these links in order to find out more about the Leadhub service and how the Leadhub handles personal data:

- [Leadhub Privacy Policy](#);

## **4. COOKIES**

### **4.1 What are cookies in general**

Cookies are small text files that are stored in your browser. They are used by web developers to help users navigate their websites efficiently and perform certain functions. Due to their core role of enhancing/enabling usability or site processes, disabling cookies may prevent users from using certain functionality of the Website. To find more about cookies you can visit the [allaboutcookies.org](http://allaboutcookies.org) or related wikipedia page.

### **4.2 Necessary and technical cookies**

The Website uses certain cookies that are necessary in order to operate the Website and other services properly and ensure security of the services and users. Storing such cookies in the user's device does not require consent of the user.

### **4.3 Third party services**

The Website uses third-party services that use cookies either as first party or third-party cookies. These cookies are stored only with the consent of the user expressed by selecting his or her choices through the cookie settings control panel displayed upon entering the Website.

#### **4.3.1 Google Analytics**

Google Analytics service uses collected cookies to analyse how the Website is used. The information generated by the cookie about use of the Website (including IP address) will be provided by Google, Inc. uploaded and stored on Google, Inc. servers All data obtained in this way will be processed anonymously. For more information on [cookies used by Google analytics](#) follow the link provided.

#### **4.3.2 Facebook Pixel**

Facebook Pixel cookies are used to analyse advertising campaigns. The collected information might be shared with Facebook, a company based in the USA through its Ireland based subsidiary. For more information on the [Facebook cookies](#) follow the link provided.

### **4.4 Your choices**

#### **4.4.1 Settings in your browser**

You can set your browser to reject all cookies or just the ones you select. You can learn how to set your browser preference in the Help section of your browser. Should you decide to reject all cookies, please remember that the Website and our application might not function properly.

You can also delete any cookies from your browser after you visit of the Website to maximise your privacy.

#### 4.4.2 Google Analytics

You can opt-out of the Google Analytics by using the [Google Analytics Opt-out Browser Add-on](#).

#### 4.4.3 Technical and security cookies

If you reject all cookies or set your browser to not store any cookies, you might deny storing some or all of the necessary and technical cookies. In this case some functions of the Website might not work properly or might not work at all and some services might be unavailable.

### 5. **ADVICE ON RIGHTS**

You have the following rights in connection with processing of your personal data: (1) the right of access to personal data, (2) the right to rectification of inaccurate personal data, (3) the right to restriction of processing, (4) the right to erasure of personal data, (5) the right to object to processing of personal data, (6) the right to revoke your consent, (7) the right to data portability and (8) the right to lodge a complaint with a supervisory authority.

Controller might need to verify your identity when you make a request to exercise any of the rights mentioned above and is entitled to request further information in order to comply with your request.

#### 5.1 **Right of access**

In relation to processing of personal data, you have the right to obtain, upon your request, information about the processing and the copy of your processed data.

#### 5.2 **Right to rectification**

When you have reason to believe your personal data are inaccurate, outdated or incorrect in any way, you have the right to contact the Controller and the controller will ensure due rectification when provided with accurate, up to date and correct information.

#### 5.3 **Right to restriction of processing**

In cases where the processed personal data are inaccurate or you have objected to the processing, you have the right to request restriction of the processing of the personal data.

For the period of the restriction, personal data shall only be stored with and may not be subject to any other operation without your consent. The restriction of processing lasts for the duration of any of the above described situations. You shall be informed of the termination of such restriction.

#### 5.4 **Right to erasure (right to be forgotten)**

In cases when you withdraw your consent or the personal data are no longer necessary, you have the right to their erasure.

Nevertheless, in some cases the right to erasure is limited. For example, personal data processed for compliance with legal obligations imposed on the Controller must not be erased before the expiry of the retention period specified in law.

#### 5.5 **Right to object**

In case of the processing based on legitimate interests and/or for the purposes of direct marketing, you may lodge a reasoned objection to the processing. The grounds for the objection will be assessed and you will be notified of the decision. Based on the assessment the processing shall be either ceased or the objection shall be dismissed.

#### 5.6 **Right to withdraw consent to processing of personal data**

In case of processing of personal data based on consent, this consent may be withdrawn at any time.

## **5.7 Right to data portability**

Where the processing of personal data provided by you is based on consent or on a contract and is carried out completely by automated means and the personal data are stored in a structured, machine-readable format, you have the right to receive these personal data in a structured, machine-readable format.

## **5.8 Right to lodge a complaint with a supervisory authority**

If you consider that your personal data are not processed according to law, you have the right to lodge a complaint with a supervisory authority of your habitual residence, place of work or place of the alleged infringement.

## **6. EFFECTIVE DATE AND CHANGES TO THE PRIVACY NOTICE**

### **6.1 Changes to the Privacy Notice**

Controller reserves the right to change this Privacy Notice as the Website and business of the Controller evolves. Controller shall publish any changes to this Privacy Notice on the Website.

### **6.2 Effective date**

This Privacy Notice shall be effective from 10. July 2022

## **7. CONTACT DETAILS**

If you have any questions related to the privacy and personal data processing feel free to contact the Controller on these contacts:

E-mail: support@legacy-nft.com

You can also contact the Controller's appointed representative in the EU the company D.I.C. SERVICES SE on the following contacts:

E-mail: support@legacy-nft.com

Postal Address: Washingtonova 1624/5, 110 00 Nové Město