

Satoshi's Treasure Privacy and Data Protection Policy

This Privacy and Data Protection Policy describes the policies and procedures of Satoshi's Treasure ("ST", "we", "our" or "us") regarding our collection, use and disclosure of your information in connection with your access and use of <https://satoshistreasure.xyz> (the "Site"), our mobile application for iOS and Android (the "App"), and the other services, features, products, content or applications offered by Satoshi's Treasure (together with the Site and the App, the "Services"). As used in this Privacy and Data Protection Policy, "Personal Data" means any information that can be used to individually identify a person.

We urge you to read this Privacy and Data Protection Policy in full, but wanted to mention a few things upfront:

- This Privacy and Data Protection Policy covers our treatment of Personal Data that we collect about you (a) from you directly, when you subscribe and use your Account on the Services; (b) from your web browser and/or device, as you interact with the Services generally; and (c) from third party websites and services, including our business partners and providers.
- In this Privacy and Data Protection Policy, we describe the various purposes for which we use your Personal Data, as well as the legal bases supporting those purposes. As you'll read below, the legal basis on which we rely for a given use of your Personal Data may be contractual necessity (*i.e.*, where we need to use your Personal Data to complete a contract with you), consent (which you must freely give us, and which you can withdraw at any time), and/or certain legitimate business interests of ours or of others, but only where we have determined that those interests are not overridden by your own interests, rights, and freedoms.
- The hunt is hosted and operated in the United States and elsewhere throughout the world through us and certain of our stakeholders. By using the Services, you acknowledge that any Personal Data you provide to us will be hosted on United States servers and servers in other countries.
- If you are using the Services in the European Economic Area, you may have certain rights regarding the Personal Data we collect from you, under the European Union General Data Protection Regulation ("GDPR"), and for purposes of the GDPR, Satoshi's Treasure would be a controller of Personal Data collected from you through the stakeholders.
- This Privacy and Data Protection Policy does not apply to the practices of third parties that we do not own or control, including, but not limited to, any third party websites, services, products or applications (each a "Third Party Service") that you elect to access and may interact with during your use of the

Services, or to individuals that we do not manage or employ. We take steps to ensure that we only work with Third Party Services that share our respect for your privacy, although we cannot take responsibility for the content, products, services or privacy policies of those Third Party Services. We encourage you to carefully review the privacy policies of any Third Party Services you access.

What Does This Privacy and Data Protection Policy Cover?

This Privacy and Data Protection Policy covers Satoshi's Treasure's processing of Personal Data that Satoshi's Treasure gathers when you are using the Services. As used in this Privacy and Data Protection Policy, "processing" generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure.

This Privacy and Data Protection Policy also covers Satoshi's Treasure's treatment of any Personal Data that ST's business partners and providers share with Satoshi's Treasure, or that Satoshi's Treasure shares with its business partners and providers.

This Privacy and Data Protection Policy does not apply to the practices of third parties, and their sites, services or applications that does not own or control, or to individuals that Satoshi's Treasure does not employ or manage ("Third Parties"). While we attempt to provide access only to those Third Parties that share our respect for your privacy, we cannot take responsibility for the content, actions or data protection policies or practices of those Third Parties. We encourage you to carefully review the data protection policies and practices of any Third Parties you access.

What Personal Data does Satoshi's Treasure Collect From You?

We collect Personal Data about you when you provide such information directly to us, when third parties such as our business partners or providers provide us with Personal Data about you, or when Personal Data about you is automatically collected in connection with your hunt participation.

By providing Personal Data of others to , you represent that you have authority to do so. We disclaim responsibility for the information of others that you provide to us in the course of your use of our Services.

Information we collect directly from you: We receive Personal Data directly from you when you provide us with such Personal Data, including without limitation the following:

- subscribe information, including your:
 - phone number
 - email address.
- Any Personal Data that you make available on or through the Services.
 - bank account
 - shipping address.

If applicable, in order to collect payments on your behalf, and provide payments to you, we, collect payment information from you, your attendees and team members, your vendors, and other parties to whom we provide payments on your behalf and from whom we collect payments on your behalf.

Information we automatically collect when you using our Services: Some Personal Data is automatically collected when you use our Services, such as the following:

- IP address,
- Web browser information,
- Operating system information,
- Certain Cookies (see below for more information) (collectively, “Usage Data”).

Information we do NOT collect when you use our Services:

- Browsing history outside of the hunt, including the pages you visit when you exit the hunt,
- Publicly available information about your social media profiles, interests or preferences, or page view information,
- Event tracking or screen recording in our iOS or Android apps for session replay analytics, and
- Cookies for targeting and marketing purposes.

How Do We Use Your Personal Data?

We process Personal Data to operate, maintain and understand our Services. For example, we use Personal Data to:

- Verify and establish your subscribe
- Process and fulfill your purchases of Products
- Protect against or deter fraudulent, illegal or harmful actions
- Communicate with you about the hunt, including sending you updates and emails.
- Comply with our legal or contractual obligations
- Respond to user inquiries
- Fulfill user requests
- Resolve disputes

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

- **Contractual Necessity:** We process the following categories of Personal Data as a matter of “contractual necessity,” which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
 - Subscribe Information that you provide us.
 - Information that you provide us when purchasing Products through the Services.
- **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

How and With Whom Do We Share Your Data?

We share limited Personal Data with vendors, third party service providers, and agents who work on our behalf and provide us with services related to the purposes. We limit this based on the minimum information required for such vendors, third party service providers, and agents to perform the required services. These parties include:

- Hosting service providers;
- Email providers;
- Payment processors;
- Cloud communication service providers;
- Shipping providers; and
- Contractors.

We also share Personal Data when we believe it is necessary to:

- Comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies.
- Protect us, our business or our users, for example to prevent spam or other unwanted communications and investigate or protect against fraud.

Last, we also share information with third parties when you give us your express consent to do so.

Furthermore, Satoshi’s Treasure will NOT buy or sell Personal Data to or from a third party under any circumstances, except solely in the event that we, or

substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, in which case Personal Data would be one of the assets that is transferred to or acquired by the third party that is acquiring our assets. HOWEVER, you should know that:

- Satoshi's Treasure would only choose to sell its business or assets to, or to be acquired by, an entity that we believe will take a customer-first approach to Personal Data, like Satoshi's Treasure does; and

You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Data only as set forth in this policy.

How Do We Protect Your Personal Data?

We seek to protect Personal Data using appropriate technical and organizational measures based on the type of Personal Data and applicable processing activity. As a security-first company we go to extreme measures to protect the security and privacy of our customers and our employees.

- We keep Personal Data tracking at a minimum, and only store that which we need to in order to deliver the Services.
- We employ 'least privilege principles' when it comes to giving employees access to Personal Data – employees should only be able to access data if it is necessary for them to carry out the duties of their role. We also minimize the use of Third Party Services to only those required to deliver the Services.
- For example, we do not use Google Analytics, third party Cookies, or any similar technologies such as pixel tags, web beacons, clear GIFs, and JavaScript although it negatively impacts our ability to track customer activity and trends.
- Other examples of the steps we've taken to protect customer data and keep it from third parties include:
 - We use a self-hosted, open-source helpdesk software to manage customer tickets, so no Personal Data is shared with major helpdesk software providers to prevent unauthorized access to your Personal Data you should select and protect (and periodically update) your password appropriately and use a password manager to randomly generate your password.

We understand the importance of the security of the information we collect, but we cannot promise that our security measures will eliminate all security risks or avoid all security breaches. However, Satoshi's Treasure cannot guarantee the security of any Account information. Unauthorized entry or use, hardware or

software failure, and other factors, may compromise the security of user information at any time.

Changes to this Privacy and Data Protection Policy:

Satoshi's Treasure may amend this Privacy and Data Protection Policy from time to time. Use of information we collect now is subject to the Privacy and Data Protection Policy in effect at the time such information is used. If we make changes in the way we use Personal Data, we will notify you by posting an announcement on our Site or Services or sending you an email. Users are bound by any changes to the Privacy and Data Protection Policy when he or she uses the Services after such changes have been first posted.

Effective Date of Privacy and Data Protection Policy: April. 21, 2019