

## PRIVACY POLICY

Digital Village mission is to develop a method for building sustainable online cyber environments and to provide individual users with personalized user experience of the currently available version of our Digital Village platform while creating digital sustainability standards by comparing physical events and activities with digital ones conducted on our platform as well as to provide sustainable designers an opportunity to promote their digital design items to users.

Central to this objective is the compliance with applicable data protection laws and regulations as well as transparency about the collection, use and sharing of personal data related to the provision of our services.

This Privacy Policy is applicable to the personal data processed by Digital Village (“**DV**”, “**we**” or “**our**”) relating to the visitors, registered users and/or their authorized representatives, initial designers as well as other stakeholders and business partners of Digital Village (aforementioned data subjects are hereinafter collectively referred to as “**User**” or “**you**”) of or related to our [digitalvillage.io](https://digitalvillage.io) website, browser and/or mobile application enabled Digital Village platform, associated intermediary marketplace (e-commerce) for purchasing services as well as any other related online or off-site services provided by us (hereinafter collectively referred to as “**Services**”), but excluding any services stating that they are offered under a different privacy policy. Users may be private individuals, authorized representatives of initial designers and/or authorized representatives of our customer organizations or business partners.

The purpose of this Privacy Policy is to provide Users with information about the processing of their personal data in accordance with the information obligations set in Articles 13 and 14 of the General Data Protection Regulation 2016/679/EU (“**GDPR**”).

Throughout this Privacy Policy the term “**processing**” is used to cover all activities involving your personal data, including collecting, handling, storing, accessing, using, transferring and disposing of information.

Please note that this Privacy Policy only applies to our processing of personal data of the above mentioned data subjects where we act as a data controller. This Privacy Policy does not address, and we are not responsible for, the privacy and data processing practices of any third parties.

This Privacy Policy may be updated if required in order to reflect the changes in data processing practices or otherwise. The current version can be found on our website [digitalvillage.io](https://digitalvillage.io). We will not make substantial changes to this Privacy Policy or reduce the rights of Users under this Privacy Policy without providing a notice thereof.

## CONTACT DETAILS

Name: Digital Village IO

Business ID: FR53898130612

Correspondence address: 34 avenue des Champs Elysees, 75008, Paris, France  
Contact: [metaverse@digitalvillage.io](mailto:metaverse@digitalvillage.io)  
Website: [www.digitalvillage.io](http://www.digitalvillage.io)

## **PERSONAL DATA PROCESSED AND SOURCES OF DATA**

We collect five types of information concerning the Users: (i) User data; (ii) Transaction data; and (iii) Analytics data.

User data is received directly from the Users in connection with the registration to and use of the Services. This refers to all personal data about you generated through your use of the Services, including our voice recognition functionality embedded with interactive 3D object that will morph/change according your words spoken through your internal device microphone, provided you have granted us access to your internal device microphone as part of the provision of the Services. User data further includes personal data processed by us in relation to representatives of initial designers and/or our other stakeholders or business partners use of the Services.

Furthermore, our Services automatically utilize an external blockchain process available through VeChain.org. The purpose of the blockchain process is to create a smart contract based account for each individual user interested in purchasing digital items from the initial sellers through the Services as well as to validate the User's claim for such digital asset/item. Likewise, a smart contract based account shall be created in the blockchain process for initial users for the purposes of authenticating the issuance of digital items from the initial designer to the individual User.

Even though the smart contract based blockchain accounts are primarily based on anonymity with no identifiable information attached related to the User it may, however, in certain situations be possible to identify individuals holders of smart contract based blockchain accounts by combining or linking other data hold by the Users and/or any third party partner. In such situations, blockchain-related data shall also be considered to be personal data under applicable laws and we will treat the combined data as personal data, and process such data in accordance with this Privacy Policy and, as applicable, [VeChain.org](https://www.vechain.org/privacy-policy/) privacy policy available at <https://www.vechain.org/privacy-policy/>.

Transaction data concerning payment transactions and credit card information is received directly from the User via third party payment service provider, whenever Users are placing orders and executing payments for services associated with digital items available through the Services.

Analytics data is collected automatically as you use the Services. Analytics data is primarily collected in an aggregated form meaning that the identification of single individual from the aggregated data sets is not usually possible. However, in certain situations it may be possible to recognize individuals from analytics data, either alone or when combined or linked with user data. In such situations, analytics data shall also be

considered to be personal data under applicable laws and we will treat the combined data as personal data, and process such data in accordance with this Privacy Policy.

DV may process the following categories of personal data:

User data:

- full name;
- e-mail address;
- voice data (where applicable);
- feedback and ratings concerning the Services;
- data related to blockchain accounts, such as private keys associated with smart contracts or ownership status of digital clothing items (where applicable);
- city and postal code;
- marketing consent and/or prohibition;
- records of your interaction with our customer service, such as phone records; and
- other information you choose to provide us through our correspondence concerning the Services.

Transaction data

- payment method and payment card number (depending on the payment method);
- transaction time;
- delivery address;
- account number (depending on the payment method);
- billing details;
- details for successful or interrupted purchases (order number, merchant, price); and
- details for possible return payment (where applicable).

Analytics data:

- IP address;
- country;
- device type, number and model (computer, phone or tablet);
- advertisement and visitor identifier for your device;
- operating system;
- time of visit and time zone;
- browser type and version;
- language settings and preferences; and
- metadata relating to the use of the Services.

The use of our Services does not depend on the provision of any special categories of personal data under GDPR article 9(1). To the extent that the User voluntarily decides to provide such data to the Services, we shall in addition to our legitimate interest primarily rely on articles 9(2)(a), 9(2)(e) and/or 9(2)(f) of the GDPR.

Your personal information shall not be processed for the purposes of automated decision-making, including profiling.

## **COOKIES AND ANALYTICS TOOLS**

We use various technologies to collect and store Analytics Data and other information when Users visit our Services, including cookies.

Cookies are small text files sent and saved on your device that allows us to identify visitors of our websites and facilitate the use of our Services and to create aggregate information of our visitors. This helps us to improve our Services and better serve our Users. The cookies will not harm your device or files. We use cookies to tailor our Services and the information we provide in accordance with the individual interests of our Users.

Information collected by cookies is not, in principle, associated with personally identifiable information but some information collected by Cookies may be indirectly associated with personally identifiable information relating to identifiable person. Such information includes User's IP address and unique device ID.

### *What cookies do we use and how are they used*

#### *Necessary Cookies*

Necessary cookies are essential to ensure the availability of our Services. For example, necessary cookies pre-load certain procedures of our Services in order to speed up the website's loading and register a unique ID for the website's visitor in order to recognize them again later.

#### *Analytics Cookies*

We use analytics cookies to improve the operation of the Services. Analytics cookies collect information, among other things, on how Users use the Services and how Users navigate between the various tabs on the Services. In addition, analytics cookies are used to collect statistics and technical information about Users' devices and to maintain a session when a User visits another website during the session.

#### *Marketing Cookies*

We use marketing cookies in our Services. These cookies help us customize our marketing and provide Users with more personalized services in the future. We use marketing Cookies to collect information about for example User behavior and preferences on our Services. We use this information to optimize our Services and to better target content and advertising to Users. In addition, third-party advertisers can for example use marketing cookies to target Users with more relevant and real-time ads.

### *First and Third-Party Cookies*

The Cookies we use can also be divided into first party cookies and third-party cookies. First-party cookies are provided by DV and we manage them ourselves – their functionalities cannot be influenced by third parties.

Third-party cookies are provided and managed through the Services by the service providers we use.

### Cookie duration

We use session cookies and persistent cookies. Session cookies last only for the duration of the session on our Services and are deleted automatically when the browser is closed. Persistent cookies stay in your browser until they are removed, or until they expire. Therefore, persistent cookies are not deleted automatically when you close the browser or leave the Services.

### How do you control cookies

If you do not wish to have cookies stored on your device, you may choose to set your web browser to refuse cookies or delete the cookies stored by the Services. Most web browsers allow you to block cookies by default and disabling cookies does not prevent you from accessing our website. However, you must have enabled cookies when you log into our Services. You can re-enable cookies at any time.

For example, the following links provide information on how to adjust the cookie setting on some popular browsers:

[Safari](#)

[Google Chrome](#)

[Internet Explorer](#)

[Mozilla Firefox](#)

Please note that some parts of our Services may not function properly if use of cookies is refused.

We also use Google Analytics to compile Analytics Data and reports on visitor usage. For an overview of Google Analytics, please visit [Google Analytics](#). It is possible to opt-out of Google Analytics with the following browser add-on tool: [Google Analytics opt-out add-on](#).

## **PURPOSES AND LEGITIMATE GROUNDS OF PROCESSING**

### Purposes of processing

*To provide our Services and carry out our contractual obligations (legal ground: performance of a contract and legitimate interest)*

We process personal data to be able to offer the Services to our Users and to run and maintain our business. Personal data may be processed in order to carry out our contractual obligations towards the User or towards the organization the User represents. We may use the data for example to offer essential functionalities of the Services and to provide access to the Services.

*For our legal obligations (legal ground: compliance with a legal obligation)*

We process personal data to enable us to administer and fulfil our obligations under law. This includes data processed for complying with our bookkeeping obligations and providing information to relevant authorities, such as tax authorities.

*For claims handling and legal processes (legal ground: legitimate interest)*

We may process personal data in relation to claims handling and legal processes. We may also process data for the prevention of fraud, misuse of our Services and for data, system and network security.

*For communication and marketing (legal ground: legitimate interest)*

We may process personal data for the purpose of contacting our Users regarding our Services and for informing Users of changes in our Services. We may also process personal data to market our Services, for example in the form of sending newsletters.

*For quality improvement and trend analysis (legal ground: legitimate interest)*

We may process information regarding the use of the Services to improve the quality of our service, for example by analysing any trends in the use of our Services. Where possible, we will do this using only aggregated, non-personally identifiable data.

#### Legitimate grounds for processing

We primarily process personal data of Users on a contractual basis. For Users acting as representatives of our initial designers and/or customer or partner organizations, personal data is primarily processed based on our legitimate interest whilst fulfilling our contractual obligations towards the organisations they represent.

We may also process personal data based on our legitimate interests, for example in connection with analytics and marketing. When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against your right to privacy.

In certain cases Users may be requested to grant their consent for the processing of personal data. In this event, the legal ground for such processing is your consent. You may withdraw your consent at any time free of charge and without providing a reason.

#### **INTERNATIONAL TRANSFERS**

DV stores Users' personal data primarily within the European Economic Area. However, we have service providers in several geographical locations. As such, we, and our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or outside of the User's domicile.

We will take steps to ensure that the Users' personal data receives an adequate level of protection in the jurisdictions in which it is processed. We provide adequate protection for the transfers of personal data to countries outside of the European Economic Area through a series of agreements with our service providers based on the Standard Contractual Clauses or other similar arrangements.

You may receive further information on international transfers by contacting us using the above-mentioned contact details.

#### **PERSONAL DATA RECIPIENTS**

We do not share personal data with third parties outside of our organization unless one of the following circumstances applies:

*It is necessary for the purposes set out in this Privacy Policy*

To the extent that third parties need access to personal data to perform the Services, we have taken appropriate contractual and organisational measures to ensure that personal data are processed exclusively for the purposes specified in this Privacy Policy and in accordance with our instructions and all applicable laws and regulations, including but not limited to appropriate confidentiality undertakings.

*For legal reasons*

We may share personal data with third parties outside our organization if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, properties or safety of DV, our Users or the public in accordance with the law. When possible, we will inform Users about such transfer and processing.

*To authorized service providers*

We may share personal data to authorized service providers who perform services for us (including facilities responsible for manufacturing your order, logistics providers responsible for the delivery of your order as well as providers of other relevant data storage, sales, marketing and support services).

Further we may share your personal data with authorized providers of bookkeeping and/or payment services.

Our agreements with our authorized service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy.

*For other legitimate reasons*

If HFW is involved in a merger, acquisition or asset sale, we may transfer personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data. We will give notice to all Users concerned when the personal data are transferred or become subject to a different privacy policy as soon as reasonably possible.

*With explicit consent*

We may share personal data with third parties outside of our organization for other reasons than the ones mentioned before, when we have the User's explicit consent to do so. You have the right to withdraw this consent at all times free of charge and without providing a reason.

*Anonymous and aggregate data*

Please note that the above principles regarding disclosure of data apply to personal data. We may disclose aggregate data to third parties, but solely to the extent such aggregate data is in anonymous format and does not include any personal data.

## **STORAGE PERIOD**

DV does not store personal data longer than is legally permitted and necessary for the purposes of providing the Services or the relevant parts thereof. The storage period depends on the nature of the information and the purposes of processing. The maximum period may therefore vary per use.

The majority of Registration and/or User Data shall be deleted within sixty (60) days following the removal of a User's account to the Services. We may, however, retain such User Data for longer period provided we are subject to a legal requirement to retain such data or we have a legal mandate in doing so, such as for the purposes of establishment, exercise or defence of legal claims or in relation to our bookkeeping obligations.

Transaction Data shall be stored in accordance with the applicable bookkeeping and limited liability company legislation, in most cases between six (6) to ten (10) years following the respective transaction.

We will store Analytics Data relating to the Service no longer than reasonably necessary and in any case no longer than twelve (12) months.

## **USERS' RIGHTS**

### *Right to access*

You have the right to access your personal data processed by us. You may contact us and we will inform what personal data we have collected and what personal data we process regarding you.

### *Right to withdraw consent*

In case the processing of your personal data is based on a consent you have granted to us, you may withdraw the consent at any time free of charge. Withdrawing a consent may lead to fewer possibilities to use our Services. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### *Right to rectify*

You have the right to have incorrect or incomplete personal data we have stored about you corrected or completed by contacting us. You may also directly update some of your User Data through your Service account.

### *Right to erasure*

You may also ask us to erase your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data.

### *Right to object*

You have the right to object to certain use of your personal data if such data are processed for other purposes than necessary for the performance of the Services or for compliance with a legal obligation. If you object to the further processing of your personal data, this may lead to fewer possibilities to use the our Service.

### *Right to restriction of processing*



You may request us to restrict processing of personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data. This may however lead to fewer possibilities to use our Service.

#### *Right to data portability*

You have the right to receive your personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

#### *How to use the rights*

The above mentioned rights may be used by sending a letter or an e-mail to us on the addresses set out above. We may request the provision of additional information necessary to confirm your identity.

We reserve the right to reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

### **DIRECT MARKETING**

Notwithstanding any consent granted beforehand for the purposes of direct marketing, you have the right to prohibit us from using your personal data for direct marketing purposes, market research and profiling made for direct marketing purposes by contacting us on the addresses indicated above or by using the unsubscribe possibility offered in connection with any direct marketing messages.

### **INFORMATION SECURITY**

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience and ability restore the data. We regularly test our systems, and other assets for security vulnerabilities.

Should despite of the security measures, a security breach occur that is likely to have negative effects on your privacy, we will inform you and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.

### **LODGING A COMPLAINT**

In case you consider our processing of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection.