

Chiliz.net Privacy Notice

Privacy Notice

Last Updated 8th May 2024

1. Parties

1.1

This Privacy Notice describes how Entertainment Trading Technologies Ltd (or otherwise referred to herein as “Chiliz”, “Company” “us” or “we”) treats your personal information and the data provided to us in order to be able to manage our relationship. We manage any personal information you provide to us either through the website www.chiliz.net and the Chiliz Exchange Mobile Application (hereinafter referred to as 'this Website/App' or 'the Website/App' and are kept by us in relation to you in the manner specified in this Privacy Notice.

Chiliz is a platform dedicated to the transaction of digital assets and the provision of related services (hereinafter referred to as 'the Service').

1.2 All natural persons or other subjects who log onto this Website/App shall be users of this Website/App. For the convenience of wording in this Agreement, the users are referred to as 'you' or any other applicable forms of the second-person pronouns.

1.3 For the convenience of wording in this Notice, you and we are collectively referred to as “both parties,” and individually as “one party.”

1.4 We take our responsibilities under the Constitution of Seychelles and Seychelles’ Data Protection Act of 2003 (the “DPA”) seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

2. Who Are We

We are Entertainment Trading Technologies Ltd, a Company registered in the Republic of Seychelles with company registration number 218014, whose registered address is at, Suite 202, 2nd Floor, Eden Plaza, Eden Island, Make, Republic of Seychelles. We have appointed an European Representative, who may be contacted at chiliz.dpo@marcellocarames.com.

3. Purposes of the Privacy Notice

This Privacy Notice stipulates the types of information that we may collect through your log in to this Website/App, your registration with this Website/App, and/or use the services we offer, as well as how we shall use and protect the information so collected. If you are in the European Union, the European General Data Protection Regulation (GDPR, EU 976/2016) applies.

To ensure that you have full confidence in our handling of personal data, you are advised to read and understand the terms of this Privacy Notice in detail. In particular, upon your log into our Website/App, regardless of whether you register with this Website/App, you shall be deemed to accept, undertake and confirm that:

3.1 You, on the basis of your own free will, agree to disclose your personal information to us;

3.2 You will comply with all the terms of this Privacy Notice;

3.3 You agree that we may collect your information through your log into this Website/App, your registration with this Website/App, and/or your using the Services offered by us; you agree to any changes and modifications that we may make to our Privacy Notice in the future;

3.4 You agree that our branches, affiliates and employees may contact you in connection with the products and services that you may be interested in (unless you have indicated that you do not want to receive such information).

4. Information Collected

4.1 When you use this Website/App, you agree to permit us to use cookies to track each of your actions and collect and keep all the information that you leave on this Website/App, including but not limited to your IP address, location, and other information. We will collect your personal data in accordance with the legislative purpose of the DPA.

For security purposes, we have integrated GeeTest Captcha on our Website/App: this tool will collect some personal data related to your browser window, in order to confirm that you are a human and not a bot. For further information, please refer to the third party's [Privacy Policy](#) and [Terms of Service](#).

4.2 If you wish to use the services offered by this Website/App, you will be required to fill in and provide the following two categories of information:

4.2.1 Identity Information.

Such information can help us verify whether you are eligible to be registered as a member of this Website/App. It includes but is not limited to your name, residence address, mailing address, location, other certificates and corresponding numbers thereof that are issued by your country or government to certify your identity information, as well as all other information that can help us to verify your identity (hereinafter referred to as 'identity information').

4.2.2 Service information.

Such information helps us to contact you and provide you with the services, including but not limited to your phone number, fax number, valid email address, mailing address, and information concerning your debit card and/or other accounts (hereinafter collectively referred to as 'service information').

4.3 When you use this Website/App or the services this Website/App offers, we may collect more information necessary from our exclusive mailboxes or in other manners that we consider as in compliance with relevant requirements, for the purpose of improving the functions of this Website/App, enhancing your experience of using this Website/App and its services as well as the security thereof, or as is required by any court order, any applicable law, administrative regulation or any order of any other competent government agency.

4.4 If you visit any of links to third-party Website/Apps as are listed on this Website/App or any link of any of our third-party partners, you shall agree to and comply with the separate and independent Privacy Notice of such third-party Websites/Apps. We will not bear any liability for the contents and activities of such Websites/Apps or the partners.

4.5 For the avoidance of doubt, in the event that Seychelles data protection law permits an organisation such as us to collect, use or disclose your personal data without your consent, such permission granted by the law shall continue to apply. If you are in the EU, We will process your personal data for the following purposes:

- 1) Create, operate, and manage your account;
- 2) Comply with the legal and regulatory frameworks governing our operations, including transmission of personal details, personal data about transactions and traffic data to authorities;
- 3) Create personal profiles for Fraud and Anti-Money Laundering Risk Assessment purposes;
- 4) Track transactions for the purpose of preventing fraud, money laundering and fraud, including exchanging personal data with our suppliers of Payment Processing services;
- 5) Conduct research, questionnaires, and analysis;
- 6) For company tax reporting obligations to the tax authorities;
- 7) Meet our obligations to inform and assist relevant authorities in relation to any potential criminal activities such as fraud, money laundering or terrorist financing; and
- 8) any other relevant legislation that requires us to provide some personal information.

To provide our services, and for the purpose of preventing illegitimate use of our services, we carry out profiling of our customers and their activities using automated processes. However, any decisions taken based on these profiles and information are taken by natural persons.

5. Cookies

When You visit Our site or use our App, We will collect certain categories of Personal Data automatically through the use of cookies and similar technologies.

For more detailed information including what cookies are and how and why We process such data in this manner (including the difference between ‘essential’ and ‘non-essential’ cookies) please read Our detailed Cookies Notice.

5.1 When you visit our Website/App, we use Google stats via cookies to record our performance and check the effect of online advertising. Cookies are a small amount of data that is sent to your browser and stored on your computer hard drive. Only when you use your computer to access our Website/App can the cookies be sent to your computer hard drive.

5.2 Cookies are usually used to record the habits and preferences of visitors in browsing the items on our Website/App. The information collected by cookies is non-registered and collective statistical data and does not involve personal data.

5.3 Cookies, which enable the Website/App or service provider system to recognize your browser and capture and recall information, cannot be used to obtain data on your hard drive, your email address, or your personal data. Most browsers are designed to accept cookies. You can opt to set your browser to reject cookies, or to notify you as soon as possible if you are loaded on cookies. However, if you set your browser to disable cookies, it is possible that you may not be able to launch or use some functions of our Website/App.

Our Website/App may also feature social media widgets. These social media features are either hosted by a third party or directly on our website. When using these widgets, or our respective pages on these provider's platforms, we encourage you to read and make reference to their respective privacy notices.

To find out more, please read our Cookies Notice.

6. Purposes of Information

6.1 We will use your information that we collect for the following purposes or in the following ways:

6.1.1 to provide you with our Services through our Website/App;

6.1.2 to identify and confirm your identity when you use our Website/App;

6.1.3 to improve and upgrade the services of the Website/App (your information and feedback received by us can help us improve the service of the Website/App, so that we can more effectively respond to your service requests and support needs);

6.1.4 to keep statistics relating to the use of our Website/App and to be used for data analysis carried out in cooperation with government agencies, public affairs institutions;

6.1.5 to personalize your experience (your information will help us to better respond to your personalized needs);

6.1.6 to facilitate transactions (your information, whether public or private, will not be sold, exchanged, transferred, or otherwise provided to any other company on any grounds without your consent, except for where doing so is expressly for the purpose of completing the transaction you require);

6.1.7 to send e-mail regularly (the email address that you provide for the purpose of processing orders may be used to receive information on and updates to your orders, in addition to newsletters, updates, related products or services information, etc., that we may send to you from time to time) if you provide your consent;

6.1.8 to meet other purposes as specified in the User Agreement of this Website/App and all legal means adopted for satisfying such purposes.

6.2 We do not sell, trade, or otherwise transfer information or allow others to collect and use information. Such information does not involve the following parties and does not include the following information:

- Our affiliates, trusted third parties who help us operate our Website/Apps, manage our business, or provide services to you, provided that such parties agree to keep such information confidential;

When we believe that information disclosure is appropriate, or it is required by any of the applicable laws, regulations, rules or by any order of courts or other competent authorities, and is necessary for executing the strategy of our Website/App and ensuring the proper functioning of the Website/App, or as may be necessary for the related parties to provide services, or for the protection of the rights, property or safety of us or other persons. However, your information will not be provided to other parties for marketing, advertising or other purposes.

7. Protection of Personal Data

7.1 We adopt appropriate physical, electronic, management and technical measures so as to protect and safeguard the security of your personal data. We will, to the greatest extent possible, ensure that any personal data collected through our Website/App shall be free from being subject to nuisance by any third party unrelated to us. The security measures that we may take include but are not limited to:

7.1.1 Physical measures: records of your personal data will be stored in a properly locked place.

7.1.2 Electronic measures: The computer data that contain your personal information will be stored in computer systems and storage medias that are subject to strict login restrictions.

7.1.3 Management measures: only staff members duly authorized by us can access your personal data, and these staff members shall comply with our internal code concerning personal data confidentiality.

7.1.4 Technical measures: Encryption may be used to convey your personal data.

7.1.5 Other measures: our network servers are protected by proper 'firewall '.

7.2 If you are aware of any security flaws in our Website/App, please contact us immediately so that we can take appropriate action as soon as possible.

7.3 Despite of the above-mentioned technical and security measures, we cannot guarantee that the information transmitted via the Internet is absolutely safe, so we cannot absolutely guarantee that the personal data that you provide to us through our Website/App will be safe at any time. We will not be held liable for any loss or damage arising from or caused by any event that may occur in connection with unauthorized access to your personal data, and we shall not be held liable for compensation for such loss or damage.

8. Direct Marketing

We only send mail messages, emails and other communications relating to marketing where We are authorized to do so at law. If you are in the EU, We will rely on Your consent to do so (especially where We use electronic communications). If, at any time, You no longer wish to receive direct marketing communications from Us please let Us know by contacting Us at the details below or update Your preference on any of Our Site(s) or Apps.

In the case of direct marketing sent by electronic communications (where We are legally authorized to do so) You shall be given an easy way of opting out (or unsubscribing) from any such communications.

Please note that even if You withdraw any consent You may have given Us or if You object to receiving such direct marketing material from Us (in those cases where We do not need Your consent), from time to time We may still need to send You certain important communications from which You cannot opt out.

9. Cross-border Transfers of Personal Data.

Our Company is located in the Republic of Seychelles. To comply with EU data protection laws, We have measures in place to ensure that your personal data is granted the same level of protection as in the EU.

The Company belongs to a Group located in various countries, and We may share your personal data to companies of our Group located outside of the European Economic Area (EEA) to provide you with the services You requested; We will always ensure a similar degree of protection when transferring personal data outside the EEA, using measures such as transferring to countries deemed to hold an adequate level of data protection by the European Commission, and/or Standard Contractual Clauses issued by the European Commission, and any additional measures as may be required.

10. Third-party service providers

We ensure that data transfers with service providers are covered with appropriate controller-processor contracts and safeguards as specified by the GDPR. Such contracts include confidentiality, strict processing rules, security safeguards, breach notification requirements and provision of assistance to the Company so that any exercise of your rights is satisfied.

A list of our third-party suppliers can be provided upon request.

11. For how long do we keep your data?

After the closure of any account, Chiliz retains certain elements of personal data for a period of up to seven (7) years from last activity to meet our legal obligations towards Anti-Money Laundering and Countering Finance of Terrorism, Company and Taxation record-keeping obligations.

We will also keep personal data for the purpose of presenting and processing in case of a litigation or a legal process which you, the relevant authorities or us may be party to, due to our provision of services to you.

If your account, in any of the above cases is not active, then we will not process the data further except for complying with the above legal obligations.

All this information is stored in accordance with this Privacy Notice.

12. Your Rights.

The European Union's General Data Protection Regulation and other countries' privacy laws provide certain rights for data subjects.

Under the GDPR, You have the right to:

- a. access to the personal information provided by you;
- b. request rectification of personal data that you consider incorrect;
- c. request for restriction of processing of data;
- d. request erasure of data;
- e. file an objection about processing of your data;
- f. request to export your data; and
- g. be informed about automated individual decision-making, including profiling; and
- h. you have the right at all times to object to the processing of your data and to withdraw your consent through your account profile privacy settings.

Your rights may be exercised in accordance with the Law, which might include restrictions on when you can exercise these rights.

You can exercise these rights by contacting us via our EU representative at chiliz.dpo@marcellocarames.com.

You have also the right to lodge a complaint with your local Data Protection Authority You may find a list with your local Data Protection Authority contact details at https://edpb.europa.eu/about-edpb/board/members_en.

13. Changes to this Privacy Notice

We reserve the right to amend the Privacy Notice from time to time and at any time. We will inform you of the modifications made to the Privacy Notice by updating and publishing the effective date of the release of new versions hereof and highlighting the amendments. Sometimes, we may issue a notice to inform you of the modification made in the Privacy Notice. You shall regularly review the Privacy Notice and focus on its modifications, and if you do not agree to such modifications, you shall immediately stop accessing this Website/App. When an updated version of this Privacy Notice is released, your continued visit to this Website/App shall indicate and show that you agree to the update and agree to comply with the updated Privacy Notice. You can request previous versions of this document by sending us an email at dpo@ecija.com.

14. Communication with Us

14.1 If you have any requests and comments, you can send an email to chiliz.dpo@marcellocarames.com which is the only valid and official email through which we communicate with you, so we will not bear any liability for your failure to using effective contact information, any act or omission.

14.2 We only publish announcements and information on the basis of the valid and effective contact information on this Website/App or post announcements on this Website/App;

therefore, we shall not be held liable for any loss arising from your trust in the information that has not been obtained through the above-mentioned means.

14.3 If you have any questions regarding our Privacy Notice, you are welcome to contact us at any time.