

PRIVACY POLICY

In this Privacy Policy (the **Privacy Policy**) we will provide information on how Qrbp UAB, registration number 306356020, registered domicile at Tilto g. 1, Vilnius (**we** or the **Platform Owner**), processes your personal data on qrbp.io (the **Platform**).

You may communicate with the Platform Owner using the following contact information:

Email address: info@qrbp.io

Wallet-address 1: 0xc9a0BAa1EEd0592d370866f312C8Aac2ABB0cdfB / Wallet-address 2: 10x42A6e8b58D44546FC0D2356e509d716Ba141C572

1. What personal data do we process and for what purposes?

Accounts

- Purpose: for creating and managing your accounts on the Platform and issuing the Qrbp Token to them.
- Personal data processed: first name, last name, account name and password, phone number, email address, address, picture, Wallet ID data.
- Legal basis: legitimate interest to provide services of the Platform (Art. 6(1)(f) GDPR) when processing of personal data of representatives of legal entities; or performance of a contract and taking steps at the request of the data subject prior to entering into a contract (Art. 6(1)(b) GDPR) when processing of personal data of users who are natural persons.
- Storage period: two years after the last sign-in to the account.
- Personal data may be transferred to: Digital Faktor GmbH, legal entity code HRB 251246 at district court Munich, Blütenstraße 15, 80799 Munich, Germany.

Communication

- Purpose: for communicating with the Platform users.
- Personal data processed: first name, last name, phone number, email address.
- Legal basis: taking steps at the request of the data subject prior to entering into a contract (Art. 6(1)(b) GDPR); legitimate interest to provide services of the Platform and/or ensure quality of services (Art. 6(1)(f) GDPR).
- Storage period: one year after the enquiry is solved.
- Personal data may be transferred to: Digital Faktor GmbH, legal entity code HRB 251246 at district court Munich, Blütenstraße 15, 80799 Munich, Germany.

Newsletters, proposals

- Purpose: for direct marketing (to send newsletters/ invitations to events, to offer similar goods/ services).
- Personal data processed: first name, last name, phone number, email address.
- Legal basis: consent (Art. 6(1)(a) GDPR).
- Storage period: two years after the consent.
- Personal data may be transferred to: newsletter sending solutions.

Social media

- Purpose: for managing social media accounts.
- Personal data processed: first name, last name, unique ID, IP address, hardware information.
- Legal basis: consent (Art. 6(1)(a) GDPR); legitimate interest to communicate with clients and potential clients (Art. 6(1)(f) GDPR).
- Storage period: for as long as the person is a follower of our social media account.

- Information communicated to us when visiting our social media sites (including notifications, use of “Like” and “Follow” buttons or other communication) will be controlled by us jointly with social media managers as joint controllers. Please read the third-party privacy policy and contact the service provider directly if you have questions on how they use your personal data.
- Currently, we maintain the following social media accounts:
 - <https://www.facebook.com/qrbp.cryptocurrency/> on Facebook; their privacy policy is available at <https://www.facebook.com/privacy/explanation>
 - https://www.instagram.com/qrbp_web3/ on Instagram; their privacy policy is available at <https://help.instagram.com/519522125107875>
 - <https://www.linkedin.com/company/qrbp/mycompany/?viewAsMember=true> on LinkedIn; their privacy policy is available at <https://www.linkedin.com/legal/privacy-policy>
 - <https://www.youtube.com/channel/UCaSmRObZ-7uOXDvJyadLHcA> on Youtube; their privacy policy is available at <https://policies.google.com/privacy>
 - https://twitter.com/Qrbp_Web3 on Twitter, their privacy policy is available at <https://twitter.com/en/privacy>

2. Whom can we transfer your personal data to?

We may transfer information about you to our employees, agents and such service providers as debt administration/collection companies or companies providing archiving services, also to legal/marketing/IT service providers or subcontractors if it is reasonably required for the purposes stated in this Privacy Policy.

In addition, we may disclose your personal information in cases when required to do so by law or seeking to protect our rights or interests (including the case when your personal data is transferred to others for debt recovery purposes), also when intending to sell the Platform or part of the company’s business or assets, or to attract investors or to reorganize the company (and during such processes) we are asked to disclose your personal data to any (potential) investor or buyer of the Platform, business or assets, or to other participants in the reorganization.

3. How is your personal data processed?

Your personal data will be processed in accordance with the General Data Protection Regulation (the **GDPR**), the Law of the Republic of Lithuania on Legal Protection of Personal Data, and other legal requirements. When identifying personal data processing measures and during such processing, the Platform Owner should implement appropriate technical and organizational measures envisaged in the laws for the protection of personal data against accidental or unlawful destruction, damage, modification, loss, disclosure, or any other kind of illegal handling and will adopt proper measures considering the risks involved in such personal data processing.

4. What are your rights?

Below, please find information about your rights associated with the processing of your personal data by the Platform Owner and about how such rights may be exercised. If you want more information about your rights or want to exercise them, please contact us at the email address given in this Privacy Policy.

- You may contact us at any time to ask whether any of your personal data is being processed by us. If your personal data is stored or used by us in whatever way, you have the right of access to such data. In order for you to exercise such right, please send us a written request at the email address given in this Privacy Policy. We may ask you to confirm your identity so that your request could be granted. Please observe the principles of reasonableness and good faith when submitting such request.
- If you have given us consent to process your personal data, you may withdraw such consent at any time by sending us an email letter to the email address given in this Privacy Policy.

- You have the right to request us to correct any inaccuracies in your personal data. In that case, we may ask you to confirm the information corrected.
- You have the right to request us to erase your personal data. This right may be implemented in the cases described in Article 17 of the GDPR.
- You have the right to request us to restrict/refrain from processing your personal data.
- You have the right to data portability if processing of such data is carried out by automated means and we have obtained such data from you based on your consent or for the purpose of concluding an agreement. If you opt to exercise this right, we will transmit at your request a copy of the data submitted by you.
- You have the right to object to processing of your personal data pursuant to Article 21 of the GDPR.

5. How can you exercise your rights?

To enforce your rights, you may submit requests, complaints or claims to us in writing by using the contact information given in this Privacy Policy.

We will respond to your request, complaint or claim in writing in accordance with the applicable laws and will do our best to provide you with the necessary information within the shortest time possible but in no event later than within 30 (thirty) days after receiving your request.

If having received your request, complaint or claim we have doubts about your identity, we may ask the applicant to produce an identity document.

6. Complaints

If you believe that your rights as the data subject have been and/or may be violated, please immediately contact us at the email address given in this Privacy Policy. We assure you that having received your complaint, we will inform you within a reasonable time about the progress of the complaint investigation, and later about its outcome. If you are not satisfied with such investigation outcome, you may file a complaint with the supervisory authority. The list of the EU national data protection authorities is available at https://edpb.europa.eu/about-edpb/about-edpb/members_en.

7. Responsibility

You are responsible for ensuring that the information provided by you is accurate, correct, and complete. You should immediately notify us by email if changes are made to the data you have submitted. Therefore, we will not be held liable for any damage resulting from your failure to provide correct or complete personal data or to give us notice of changes made to such data.

This Privacy Policy was last updated on 1 August 2023