

## ABOUT THIS POLICY

1.1. This is the privacy policy for Uppsala Pte. Ltd. (a company incorporated in Singapore) (“Uppsala”). In this policy, “we”, “us” or “our” refers to Uppsala.

1.2. This policy sets out the manner in which we collect, use, disclose and process your personal data when you: access or use our websites, applications and services (including our Chainkeeper Services, Sentinel Protocol Platform and UPPward Extension), or provide us with your personal data.

1.3. We may amend this policy from time to time without notice to you, in compliance with applicable laws or as we update our data usage and handling processes. The updated policy will supersede earlier versions and will apply to personal data provided to us previously. The updated Privacy Policy will take effect when made available on <https://www.chainkeeper.ai>.

## 2. COLLECTING PERSONAL DATA

2.1. Collecting your personal data. We collect personal data that is relevant to our relationship with you. We may collect your personal data directly or indirectly through various channels, such as when:

- you authorise us to obtain your personal data from a third party;
- you use our services, e.g. our SentinelProtocol Platform;
- you visit our websites, download or use our applications, e.g. our UPPward Extension;
- you register an account with us through our websites or applications;
- you contact us or request that we contact you e.g. through social media platforms, you transact with us, contact us or request that we contact you through various communication channels, for example, through social media platforms, messenger platforms, face-to-face meetings, telephone calls, emails, fax and letters;

- your images are captured via photographs or videos taken by us or our representatives when you are within our premises or attend events organised by us;
- you participate in events and programs, competitions, contests or games organised by us;
- we seek information about you and receive your personal data in connection with your relationship with us, for example, if you are an investor or shareholder;
- you submit your personal data to us for any other reason.

Depending on your relationship with us, we may also collect your personal data from third party sources, for example:

- our business partners such as third parties providing advertising, marketing and promotional services to us;
- your referees, educational institutions or previous employers (if you have applied to us for a job);
- your family members or friends who provide your personal data to us on your behalf; and/or
- public agencies or other public sources.

2.2. Automated Data Collection Technologies. Our websites, applications and services may contain or involve certain technologies (including those described below) that collect data from you, such as your Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our websites that you visit, the time and date of your visit, your time spent on our websites, applications and services, unique device identifiers and other diagnostic data.

- Cookies. Cookies allow your browser or device to be recognised. We may make use of cookies to store and track information such as the number of users, frequency of use, profiles of users and online preferences. Cookies do not capture information that personally identify you, but we may use information collected to analyse the usage of our websites and applications and to improve your user experience. You

may disable cookies through your device or plug-in settings. However, this may affect your use of our websites and applications.

- **Website Log Files.** We collect data in the form of server log files that tell us generally about the activity of users on our websites and applications, including length of visits, the webpages requested, IP address, cookies, the type of web browser and operating system you are using, click-stream data and so forth. We use this data to analyse overall trends, administer our websites, applications and services, track usage, optimize and improve your user experience, as well as evaluate and improve our websites, applications and services.
- **Analytical Tools.** We use analytical tools, which allow us to, among other things, identify potential performance or security issues with our websites, applications and services, improve their stability and function, understand how you use them, so that we can optimize and improve your user experience, as well as evaluate and improve our websites, applications and services.
- **Third Party Analytical Tools.** Our analytical tools include third party tools. We do not control these third parties, their technologies or how they may collect and use information through their tools. The tools that are currently in use include: Google Analytics (<https://marketingplatform.google.com/about/>), Log entries (<https://www.rapid7.com/>), and Sentry (<https://sentry.io/>). More details about these tools, including the privacy policies of their provider can be found on their respective websites. If you have any queries about these technologies and how they collect and use information, please contact the responsible provider directly.

Please do not use our websites, applications and services if you do not wish to have your data collected through such means. Alternatively, you may also disable the operation of these technologies on your devices where it is possible to do so. Our websites, applications and services do not support Do Not Track ("DNT"). However, you may enable or disable DNT, if supported by your web browser, by enabling or disabling this feature in the preferences or settings page of your web browser.

2.3. What personal data we collect from you. The personal data we may collect from you depends on the purposes for which we will be using the personal data and what you have chosen to provide, and may include your name, contact information (such as email address); IP addresses; and other information that may identify you.

2.4. Providing personal data belonging to others. In certain circumstances, you may also provide us with personal data of persons other than yourself (such as your family members). If you do so, you are responsible for informing him/her of the specific purposes for which we are collecting his/her personal data and to ensure that he/she has provided valid consent for your provision of his/her personal data to us.

2.5. Accuracy and completeness of personal data. You are responsible for ensuring that all personal data that you provide is true, accurate and complete, and to inform us of any changes to your personal data.

2.6. Voluntary provision of personal data. Your provision of personal data to us is voluntary and you have the right to withdraw your consent for us to use your personal data at any time by contacting us. However, if you do so, it may not be possible for us to fulfill the purposes for which we require the personal data, including providing services which you require from us.

2.7. Minors. Our websites, applications and services are not intended for children, minors or persons who are not of legal age. If you are a parent or guardian and you have reason to believe your child or ward has provided us with their personal data without your consent, please contact us to request for erasure of their personal data.

### **3. WHAT WE DO WITH PERSONAL DATA**

3.1. We are committed to respecting your privacy and personal data. We collect, use, disclose and process your personal data where:

- you have given us consent;
- necessary to comply with our legal or regulatory obligations, e.g. responding to valid requests from public authorities;

- necessary to support our legitimate business interests, provided that this does not override your interests or rights; and
- necessary to perform a transaction you have entered into with us, or provide a service that you have requested or require from us.

3.2. Purposes. We collect, use, disclose and process your personal data for purposes connected or relevant to our business, or to manage your relationship with us, such as:

- carrying out a transaction with you or on your behalf;
- providing and maintaining our websites, applications and services;
- authenticating, operating and maintaining your user accounts;
- assisting you with your enquiries and feedback;
- administrative purposes, e.g. accounting, risk management and record keeping, business research, data, planning and statistical analysis, and staff training;
- monitoring the usage of our websites, applications and services;
- security purposes, e.g. detecting, preventing and addressing security and technical issues related to our websites, applications and services;
- conducting data analytics to enable us to improve our websites, applications and services;
- managing and engaging third parties or data processors that provide services to us, e.g. IT services, data analytics, messaging marketing, and other professional services.
- carrying out our legitimate business interests (listed below); and
- other reasonable purposes related to the above.

3.3. Legitimate business interests. Our legitimate business interests include:

- managing our business and relationship with you, and providing services to, our users and customers;
- protecting our rights and interests and those of our users and customers;
- preventing and investigating possible misuse of our websites, applications and services;

- understanding and responding to inquiries and feedback;
- understanding how our users use our websites, applications and services;
- identifying what our users want and improving our websites, applications, services and offerings;
- enforcing obligations owed to us, or protecting ourselves from legal liability; and
- sharing data in connection with acquisitions and transfers of our business.

3.4. Marketing purposes. If you have provided us with your consent, we may use your personal data for the purposes of marketing our products, events and services and those of our strategic partners and business associates. e.g. by sending you marketing communications. In order for us to market products, events and services which are of specific interest and relevance to you, we may analyse and rely on your personal data provided to us, or data collected from your interactions with us.

3.5. Use permitted under applicable laws. We may also collect, use, disclose and process your personal data for other purposes, without your knowledge or consent, where this is required or permitted by law.

3.6. Contacting you. When using your personal data to contact you for the above purposes, we may contact you via e-mail, telephone or any other means. We will not contact you for marketing purposes unless with your consent, or we are exempted by applicable law from having to obtain consent. If you do not wish to receive any communication or information from us, or wish to restrict the manner by which we may contact or send you information, you may contact us.

## **4. DISCLOSURE OF PERSONAL DATA**

4.1. Disclosure to related parties. We may disclose or share your personal data with our related organisations or business partners in connection with the purposes described in Part 3 above.

4.2. Other disclosures. We may also disclose or share your personal data in connection with the purposes described in Part 3 above, including without limitation to the following parties:

- third parties who provide services to us, e.g. IT services, data analytics and other professional services; and
- regulatory authorities, governments or public agencies.

When disclosing personal data to third parties, we will (where appropriate and permissible) enter into contracts with these third parties to protect your personal data in a manner that is consistent with all applicable laws and/or ensure that they only process your personal data in accordance with our instructions.

## **5. CROSS-JURISDICTIONAL TRANSFERS**

We may transfer your personal data in connection with the purposes described in Part 3 above:

- from the jurisdiction where it is collected (or where you are located) to any other jurisdictions that we operate in; and
- to third parties in other jurisdictions.

Where we transfer your personal data across jurisdictions, we will ensure that your personal data is treated securely in accordance with this policy and applicable laws regardless of the jurisdictions they are transferred to. For example, we may enter into contracts with recipients to protect your personal data. You may obtain details of these safeguards by contacting us.

## **6. PROTECTION OF PERSONAL DATA**

Uppsala Pte. Ltd. acts in accordance with the Personal Data Protection Act (No. 26 of 2012) of Singapore (“PDPA”) and the European Union General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”).

6.1. Unauthorised access. The security of your personal data is important to us. While we take reasonable precautions to safeguard your personal data in our possession or under our control, achieving complete security (whether in transmission or storage of data) is impossible or impractical. We cannot be held responsible for unauthorised or unintended access that is beyond our control, such as hacking or cyber-crimes.

6.2. Vulnerabilities. We do not provide any guarantee against security breaches, nor do we make any warranty, guarantee, or representation that your use of our websites and applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities. We also do not guarantee the security of data that you choose to send us electronically. Sending such data is entirely at your own risk.

6.3. Period of retention. We retain your personal data only for as long as is necessary to fulfil the purposes we collected it for, and to satisfy our business and/or legal purposes, including data analytics, audit, accounting or reporting purposes. How long we keep your personal data depends on the nature of the data, e.g. we keep personal data for at least the duration of the limitation period for bringing claims if the personal data may be required to commence or defend legal proceedings. Some information may also be retained for longer, e.g. where we are required to do so by law. Typically, our data retention periods range from 7 to 15 years.

6.4. Anonymised data. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we are entitled to retain and use such data without restriction.

## 7. YOUR RIGHTS

7.1. You enjoy certain rights at law in relation to our collection, use, disclosure and processing of your personal data. Such rights include:

- Access: you may ask us if we hold your personal data and, if we are, you can request access to your personal data. This enables you to receive a copy of and information on the personal data we hold about you.



- Correction: you may request that any incomplete or inaccurate personal data we hold about you is corrected.
- Withdrawal of consent: you may withdraw consent for our use of your personal data.

7.2 Other rights. Depending on the laws applicable to you, you may also enjoy additional rights. For example, if you are resident in the European Union, you may also enjoy certain additional rights, including:

- Erasure: you may ask us to delete or remove personal data that we hold about you in certain circumstances.
- Restriction: you may withdraw consent for our use of your personal data, or ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy.
- Portability: you may request the transfer of certain of your personal data to another party under certain conditions.
- Objection: where we are processing your personal data based on a legitimate interest (or those of a third party) you may object to processing on this ground.

If you wish to exercise the rights available to you at law, you may contact us to do so. We may require that you submit certain forms, provide certain information (including to verify your identity) to process your request. Where permitted by law, we may also charge you a fee to process your request.

7.3 Limitations. We may be permitted under applicable laws to refuse your request to exercise your rights, for example, we may refuse (a) a request for erasure where the personal data is required for in connection with claims; or (b) an objection request and continue processing your personal data based on compelling legitimate grounds for the processing. We may also refuse a request if you are seeking to exercise rights not available to you under applicable law.

7.5 Complaints. If you are of the opinion that we have not complied with this Policy or we have infringed applicable data protection laws, we encourage you to contact us so that we can resolve your concerns. If you wish to make a formal complaint, you may also do so with any data protection regulator or authority having jurisdiction over us.

## **CONTACT US**

If you have any feedback or issues in relation to your personal data, or about this Privacy Policy, or wish to make a complaint to us, you may contact our Data Protection Officer at [info@uppsalasecurity.com](mailto:info@uppsalasecurity.com).