

BlinkPlanet.com - Privacy Policy

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INTRODUCTION

Bloxy Ltd., including its affiliates (collectively, the "**Company**", "**we**", "**our**" or "**us**"), provide virtual assets via its Internet website Blinkplanet.com, convertible into an unique and non-fungible asset (the "**Service**" and ("**Website(s)**" respectfully)):

The Company is deeply committed to safeguard the privacy expectations of its users ("**User(s)**", "**you**" or "**your**"). Accordingly, we have put in place this privacy policy ("**Policy**"), which outlines our data protection practices, including how we collect, use, disclose and protect your personal information, as well as your rights with respect to your personal information.

Please read this Policy very carefully and use it to make informed decisions, as your access to and use of our Service, whether by visiting our Website or Apps, or by creating an account through our Service, signifies that you have read and understand all terms detailed herein and you hereby agree to this Policy.

By accepting this Policy, you hereby agree and understand that you are responsible for the security of your digital wallet, and that you will implement necessary measures to protect and secure it. In any event you face a security problem or any kind of issue with your digital wallet, you are responsible to contact directly your wallet provider.

We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By visiting the Company's Websites or other online properties, or by creating an account through our Service, you hereby agree to the Privacy Policy.

If you have any questions regarding this Policy or the way we use your personal data, please refer to our table of contents and to the section 13. "HOW TO CONTACT US?" below. The Company is the controller of the personal data collected, and is responsible for the processing of your personal data.

In this Policy, you can learn about:

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1. THE PLATFORM

This platform allows Users to purchase digital images and content, which can be convertible upon User's choice into a unique non-fungible asset ("Art NFT").

"NFT" in this Privacy Policy means any blockchain-tracked token complying with the ERC-721 standard, ERC-1155 standard or other similar "non-fungible" token standard, which uses smart contracts to link to or otherwise be associated with certain content or data.

2. WHAT INFORMATION WE COLLECT?

We collect from our Users and visitors of our Service the following:

▪ Personal Information

We collect your personal information which is any information that identifies an individual or could reasonably identify an individual with reasonable effort, including, for example, your name, email address, as well as any other non-public information about you that is associated with or linked to any of the foregoing ("Personal Information").

Personal Information which is being gathered consists of the following:

- **Account details:** When you open an account and register to use our Service, you will be asked to provide us with certain details about yourself, such as: your email address, username or similar identifier.

Please note that when you wish to update your account profile, we also collect Personal Information from you.
- **Blockchain wallet address:** When you connect your personal blockchain address, we shall collect your blockchain address.
- **Payment information:** If you make a purchase, we do not directly access or use your payment information, however in order for you to enjoy all of the functions of the Service, our trusted third party payment processors collect certain payment information from you, such as your credit card number and bank account details.
- **Voluntary information:** We also collect information which you provide us voluntarily in order to personalize your account or for a specific function, which you voluntarily provide to us at your discretion for a specific function. In addition, we collect your communication when you respond to communications from us, provide us with feedback, communicate with us via email or share additional information about yourself through your use of the Service.
- **Digital Content Contribution:** Subject to our approval, you can also contribute to the Website by uploading digital content (e.g., digital pictures of yourself), and by providing digital content contribution to the Website, you are making that content and information publicly available. This information can be collected, used and disclosed by others and we cannot control who accesses your digital content contribution or what other users can do with it. Please note that the digital content contribution is governed by our [Terms Of Use](#).
- **Device information:** We collect specific types of connection details and information with regard to your device, software or hardware that can identify you, such as: device's unique identifiers (e.g. UDID, IMEI, MAC address), browser fingerprinting, IP address, wallet type, and geo-location data.

- **Information we collect from third parties:** We sometimes collect Personal Information from third party service providers, such as information which is gathered in order to verify your identity and prevent fraudulent or illegal activity.
- **Log-in history and technical information:** In order to enhance the functionality of the Service and to provide you with a better user experience, we collect technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time and the domain name of the website from which you linked to the Service; etc.).
- **Analytics information:** We collect information about your use of the Service, such as applications' usage, log files, user activity (e.g. pages viewed, user's movements, time spent, online browsing, clicks, actions, etc.), time stamps, alerts, etc. This information is collected for amongst other things troubleshooting errors and bugs as well as for research and analytics purposes about your use of the Service.

3. MINORS

The Service are not designed or directed to persons under the age of 18 or persons under the age of legal consent with respect to the use of the Service of any jurisdiction, whichever is higher ("**Legally of Age**"). We do not knowingly collect Personal Information of a minor.

If you are not Legally of Age, you are prohibited to download or use the Service nor provide any Personal Information to us.

We reserve the right to access and verify any Personal Information collected from you. In the event that we become aware that a user who is not Legally of Age has shared any information, we will discard such information.

4. PURPOSES AND CONDITIONS FOR PROCESSING PERSONAL INFORMATION

This section outlines the underlying purposes and legal bases for the processing of your Personal Information:

Purpose	Legal basis
<p>Provision of our Service; support and customer relations. We use your Personal Information, such as your username and email address for customer services purposes as well as to present our Websites and its content to you. This includes, for example, managing and updating your account, providing and operating the Service, keeping you informed about our last updates or responding to any of your inquiries, as well as your request to exercise your User rights.</p> <p>We also use your blockchain address, when you decide, at your own discretion, to convert your digital content into Art NFT.</p>	<p>The legal bases for processing this data are the performance of our contractual obligations towards you for example as described under this Policy and/or Terms of Use (Art. 6.1(b) GDPR); your consent (for example, when you agree to provide Personal Information by accepting our Cookie Notice, Policy and Terms of Use) (Art. 6.1(a) GDPR); compliance with our legal obligations (Art. 6.1(c) GDPR); and our legitimate interests (Art. 6.1(f) GDPR). Our legitimate interests in this case are enforcing our policies, protection against fraud and misuse of our Service.</p>
<p>Improving our Service. We collect and analyze information about you and your usage of our Service to</p>	<p>The legal bases for processing this data are our legitimate interests (Art. 6.1(f) GDPR), in this case – providing and improving our Service.</p>

improve the usability and effectiveness of our Service based on User's common preferences and uses.	
Marketing, advertising and analytics. We use your Personal Data in order to provide you with personalized advertisements, including behavioral advertising when you visit our Service, to market our Service and to gather aggregate usage information for analytics, statistical and research purposes, including notification of promotional offers.	The legal basis for processing this data are your consent (when required) and our legitimate interests (Art. 6.1(a), 6.1(f) GDPR). Our legitimate interests in this case are providing you with tailored services, content and advertisements that better fit your interests as well as to promote our Service.
Payments. We collect from our third-party payment processors certain information about your payment instruments for the purpose of connecting your payment instrument to your account on our Services.	The legal bases for processing this data are the performance of our contractual obligations (Art. 6.1(b) GDPR); the protection of our legitimate interests (Art. 6.1(f) GDPR), in this case enforcing our policies and preventing misuse of our Services; and compliance with legal obligations to which we are subject (Art. 6.1(c) GDPR).
Dispute resolution and protection of our legal claims. We collect your Personal Information in order to investigate violation of our policies, enable us to resolve disputes in connection with your use of the Service and to establish and defend our legal claims.	The legal basis for processing this data is our legitimate interests (Art. 6.1(f) GDPR). Our legitimate interests in this case are to establish and defend our legal claims.
Corporate transactions. We will share your Personal Information with a potential purchasers, successors or investors in the Company or in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, reorganization, bankruptcy, consolidation or asset sale of an asset or transfer in the operation thereof) in relation to the Company.	The legal basis for processing this data is our legitimate interests (Art. 6.1(f) GDPR).
Prevention of fraud or violation of our policies. We will process your Personal Information to detect and prevent fraudulent and illegal activity or any other type of activity that jeopardize or negatively affect the integrity of the Service, including by identifying risks associated with your activity on our Service. We shall also investigate any violations of our policies and enforce them.	The legal basis for processing this data is our legitimate interests (Art. 6.1(f) GDPR). Our legitimate interests in this case are to protect our Company and other Users against fraud.
Compliance with applicable laws. We process your Personal Information to comply with our various legal obligations such as adult content legislation (where applicable), anti-money laundering, identity verification (e.g., suspicion of minor using our Service), prevention of fraud, complying with data subject rights etc.	The legal basis for processing this data is to comply with our various legal obligations (Art. 6.1(c) GDPR) and our legitimate interests (Art. 6.1(f) GDPR).

Where you have not consented (or have withdrawn your consent) to the processing of your Personal Information by us, we will continue to process your Personal Information : (a) where processing is required for the performance of the contract (i.e. the Terms of Use) between you and us; and/or (b) where processing is necessary for compliance with a legal obligation to which we are subject; (c) where processing is necessary for the purposes of a legitimate interest of the Company and its affiliates (including for marketing).

Special Categories of Personal Data

Our processing of your Personal Information also involves special categories of personal data for the provisions and improvement of our Service (as defined under Article 9 of the GDPR). We will only process such information, as well as disclose it to competent authorities (law enforcement bodies), where it is strictly necessary and required for the following purposes (to the extent permissible by applicable law): (i) prevention or detection of an unlawful act; (ii) prevention of dishonesty, malpractice or other seriously improper conduct, provided that obtaining your consent prejudices those purposes.

5. MARKETING

We will use your Personal Information, such as your, email address, collected by ourselves and/or through our trusted third party subcontractors for the purpose of providing you with promotional materials, concerning the Service as well as products, services, websites and applications which relate to the Company's business partners and its affiliates (collectively: "**Marketing Affiliates**"), which we believe interests you.

We also share and disclose Personal Information with our Marketing Affiliates for the purpose of providing you different marketing offers, which we, or our Marketing Affiliates, believe are relevant for you. Our Marketing Affiliates may use this Personal Information for different marketing techniques, such as, but not limited to direct email.

We will use your Personal Information for the purpose of providing you with promotional materials solely where we have a legitimate interest in doing so, or where we have obtained your affirmative consent.

You can at any time decline receiving further marketing offers from us or from our business partners and marketing affiliates by either: following the links inserted in the promotional emails (e.g., selecting the opt-out link) or contacting our customer support. Please note that even if you unsubscribe from our marketing mailing list, we shall continue to send you service-related updates and notifications.

6. WITH WHOM WE SHARE INFORMATION?

We do not rent, sell, or share your Personal Information with third parties ("**Recipients**") except as described in this Policy. The Personal Information will be disclosed to Recipients only to the extent required for the specific purpose, as stipulated in this Policy.

We share Personal Information with any of the following recipients:

- Companies within the Company and other affiliated companies;

- Subcontractors and third party service providers, as well as their subcontractors, which by way of example include (but is not limited to) cloud computing companies, marketing affiliates, identity verification and fraud prevention services, and other data verifiers;
- Payment service providers, payment processors
- To any third parties who provide services in relation to the operation or promotion of the Service;
- Auditors, contractors or advisers of any of the Company's business processes;
- To any third parties who investigate, detect or prevent fraudulent or illegal activity (e.g. governmental authorities, police, banks and other investigatory organizations);
- Governmental and regulatory bodies, in accordance with applicable laws and regulations;
- Law enforcement agencies or authorities, as a response to their request; and
- Potential purchasers or investors in any of the companies within the Company's group (if applicable), or in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, reorganization, bankruptcy, consolidation or asset sale of an asset or transfer in the operation thereof) in relation to any company within the Company (in such event, the acquiring company or transferee will assume the rights and obligations as described in this Policy).
- Research, technical diagnostics and analytics vendors;
- Marketing and advertising partners, in accordance with our marketing policy (see above, under "**Marketing**"); and
- Whenever we believe in good faith that disclosure is necessary to protect our rights or legal claims, enforce our policies (including our Terms of Use and Policy), protect your safety or the safety of others, as well as to investigate or prevent any fraud, for security reasons or to help us with any other related technical issue.

7. INTERNATIONAL TRANSFER OF INFORMATION

Since we operate globally, it is necessary for the provision of Service and to the extent required for the specific purpose, as stipulated in this Policy to transfer your Personal Information to countries outside the European Economic Area ("EEA"). The data protection and other laws of these countries are not as comprehensive as those in the EEA.

We use best efforts to ensure that your Personal Information is protected in accordance with our Policy, through contractual means (such as by using the standard contractual clauses approved by the relevant European Commission for data transfer, as available [here](#)) or other means (such as ensuring that the European Commission decisions determined that such jurisdictions offer an adequate level of protection as available [here](#)).

For more information about the transfer of your personal data outside of the EEA, our contact details are available under the section 13. "HOW TO CONTACT US?"

8. THIRD PARTY TRACKING TECHNOLOGIES

We use third-party advertising technology across our Websites to serve advertisements when you visit or use our Service. We use and authorize third parties to use web beacons, cookies, pixels, scripts, tags and other technologies ("**Tracking Technologies**").

The Tracking Technologies automatically collect information about you, your online behavior on the Websites, and your device (for example your computer or mobile device), for different purposes, including improving and personalizing your navigation on our Service and enhancing our Service' performance. Third parties use this information to provide you with targeted content.

You can set your browser to refuse all third party cookies, or to alert you when cookies are being sent, also you can opt-out of many third party ad networks, including those operated by members of the Network Advertising Initiative ("NAI") and the Digital Advertising Alliance ("DAA").

We also allow third parties to collect information about you through Tracking Technologies. To learn more please visit our [Cookie Notice](#)

For more information regarding this practice by NAI members and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third party ad networks operated by NAI and DAA members, please visit their respective websites: www.networkadvertising.org/optout_nonpii.asp and www.aboutads.info/choices.

9. RETENTION OF PERSONAL INFORMATION

If you have registered with an account through our Service, the Company will retain your Personal Information during the period your account is active. In addition, the Company will retain your Personal Data for additional periods, to enable the Company to meet its legal obligations under applicable laws or regulations.

In addition, the Company retains your Personal Information for longer periods, provided that retaining such information is only necessary for the Company's legitimate interests, such as fraud prevention and record keeping, resolving or excising claims regarding potential disputes.

10. YOUR RIGHTS

You have certain rights regarding the collection and processing of Personal Data. To the extent these rights apply to and concern you, you can exercise them by contacting us via the contact details available under the section below "HOW TO CONTACT US?" and exercise the following rights:

- 1) Rights of access – You can obtain a copy of the Personal Data held by the Company at any time;
- 2) Right of data portability – You have the right to receive your Personal Data, in a structured, commonly used and machine-readable format and to request that your Personal Data be transmitted to a third party of your choice;
- 3) Right of rectification – In the event that the data held about you by the Company is inaccurate, incomplete or outdated, you have the possibility to request the rectification of said data (except in cases where the information is required to be kept in its original format under any applicable laws and regulations);
- 4) Right of erasure – You have the possibility at any time to request that the Company erases data held about you by sending an email to the Company as outlined in this Policy. However, you are advised that with the

deletion of your Personal Data, you might not be able to use the Service anymore or the account might be totally closed;

- 5) Right to restriction of processing, objection to processing – At any time, you have the right to request that the Company restricts or ceases to conduct certain data processes provided that there exists no other lawful basis on which the Company is authorized to process said data;
- 6) Right to withdraw your consent – You have the right to withdraw your given consent at any time. The withdrawal of consent will not affect the lawfulness of processing;
- 7) Right to lodge a complaint – All requests, complaints or queries should be addressed to the Company with the subject 'Privacy'. We will consider any requests, complaints or queries and provide you with a reply in a timely manner. You can also file a complaint with the relevant data protection authority should you not be satisfied with the way in which we handle your Personal Information. We take our obligations seriously and we ask that any concerns be first brought to our attention, so that we can try to resolve this.

Please note that these rights are not absolute, and shall be subject to our own legitimate interests and regulatory requirements. You are welcome to contact us for any questions, requests or complaints through our contact details below.

We will make an effort to reply within a reasonable timeframe. Please feel free to reach out to us at any time. If you are unsatisfied with our response, you can lodge a complaint with the competent supervisory authority.

Also, you should be aware that unless you have registered and created an account on our Website, we could not be able to respond to your request as we do not have sufficient information to identify you. We could also rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion, in accordance with our internal policies. Similarly, we will ask you to provide us with additional information in order to adequately verify your identity upon your request.

11. CHANGES TO THE PRIVACY POLICY

We reserve the right to change this Policy at any time, so please re-visit this page frequently. We will use reasonable efforts to notify you in the event substantial changes are made to this Policy, as required by law. Any modifications, updates, alteration will be effective upon our publishing of this Privacy on our Websites and as of the stated "Last Revised" date, and your continued use of the Service after the Last Revised date will constitute acceptance of, and agreement to be bound by those changes.

12. LANGUAGE VERSION

The Policy has been drafted in the English language, which is the original and controlling version of this Policy. All translations of this Policy into other languages shall be solely for convenience and shall not control the meaning or application of this Policy. In the event of any discrepancy between the meanings of any translated versions of the Policy and the English language version, the meaning of the English language version shall prevail.

13. HOW TO CONTACT US

If you have any general questions about the Service or the information that we collect about you and how we process it, please contact us via email at:

- Bloxy Ltd.
- Attn: Data Protection Officer
- DMCA@Bloxy.com

We will make an effort to reply within a reasonable timeframe. Please feel free to reach out to us at any time. If you are unsatisfied with our response, you can reach out to the applicable data protection supervisory authority.