

PRIVACY POLICY

Last Updated: June 28th, 2023

This Privacy Policy describes how Open Debt Markets Foundation Limited (the “**Company**”, “**we**”, “**us**” or “**our**”) collects, uses, and shares your personal information when you use our digital properties or services that link to this Privacy Policy, including our website located at gondi.xyz (the “**Site**”) (collectively, the “**Service**”).

Notice Regarding Use of Blockchain: Aspects of our Service may be hosted on or interact with the blockchain. Where you use aspects of our Service that are hosted on or interact with the blockchain, information about your interactions and/or transactions will be provided to the applicable blockchain network and may be accessible to third parties due to the nature of the blockchain protocol.

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PERSONAL INFORMATION WE COLLECT

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your full name and email address.
- **Profile data**, such as the blockchain address, interests, preferences, and any other information that you add to your account profile.
- **Communications** that we exchange with you, including when you contact us through the Service, social media, or otherwise.
- **Transactional data**, such as information relating to or needed to complete your orders, payments, or other transactions on or through the Service.
- **Marketing data**, such as when you sign up for our Closed Beta Waitlist or your preferences for receiving our marketing communications and details about your engagement with them.
- **User-generated content**, such as information provided or generated in connection with loan offers, collection offers, and renegotiation offers.

- **Financial data**, such as your virtual currency or cryptocurrency wallet accounts, and associated details (such as stored value).
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, public blockchains (such as Ethereum or Polygon), and other publicly available sources. We may collect data from activity that is publicly visible and/or accessible on blockchains. This may include blockchain addresses and information regarding purchases, sales, or transfers of digital assets.
- **Third-party services**, such as social media services or providers of cryptocurrency wallet services, that you may use to log into, or otherwise link to, your Service account.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Usage data**, such as details of your engagement with NFTs, including transfers and sales, on-chain and off-chain.

Cookies and similar technologies. Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users' web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a session ends, "persistent cookies" that remain longer, "first party" cookies that we place and "third party" cookies that our third-party business partners and service providers place.

- **Local storage technologies**, like HTML5 and Flash, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email address was accessed or opened, or that certain content was viewed or clicked.

HOW WE USE YOUR PERSONAL INFORMATION

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery. We may use your personal information to:

- provide, operate and improve the Service and our business;
- help you connect directly with others to transact or transfer digital assets on blockchains;
- enable security features of the Service, such as by sending you security codes via email, and remembering devices from which you have previously logged in;
- communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business. As part of these activities, we may create aggregated, de-identified and/or anonymized data from personal information we collect. We make personal information into de-identified or anonymized data by removing information that makes the data personally identifiable to you. We may use this aggregated, de-identified or otherwise anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Marketing. We, and our service providers, may collect and use your personal information for direct marketing communications. You may opt-out of our marketing communications as described in the Opt-out of marketing section below.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);

- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

To personalize your experience. We may use your personal information to personalize certain features and content for you, for example, we may use information about you to alert you to or share details about specific NFTs that may be of interest to you.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

Cookies and similar technologies. In addition to the other uses included in this section, we may use the [Cookies and similar technologies](#) described above for the following purposes:

- **Technical operation.** To allow the technical operation of the Service, such as by remembering your selections and preferences as you navigate the site, and whether you are logged in when you visit password protected areas of the Service.
- **Functionality.** To enhance the performance and functionality of our services.
- **Analytics.** To help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails. For example, we use Google Analytics for this purpose. You can learn more about how Google uses your personal information by visiting [Google Analytics' Privacy Policy](#). To learn more about how to opt out of Google Analytics' use of your personal information, visit: <https://tools.google.com/dlpage/gaoptout?hl=en>.

HOW WE SHARE YOUR PERSONAL INFORMATION

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection.

Affiliates. Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, marketing, consumer research and website analytics).

Cryptocurrency wallet or payment platforms. Providers of cryptocurrency wallets, whose privacy policies may also apply to the handling of your personal information.

API key holders. We may share user-generated off-chain data with API key holders that may include the Site's users, our partners such as lending aggregators, or other products.

Lenders you transact with. We may share your personal information with lenders that you transact with, including new lenders that are assigned in the event of a default.

Linked third-party services. If you log into the Service with, or otherwise link your Service account to, a social media or other third-party service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.

Business transferees. Acquirers and other relevant participants in business transactions (or negotiations of or due diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, the Company or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Other users and the public. Some of your personal information, such as transactions that are publicly visible or accessible on blockchains and any content (including your NFT lists) that you may choose to create and/or share, may be visible to other users of the Service or the public. This information can be seen, collected and used by others, including being cached, copied, screen captured or stored elsewhere by others (e.g., search engines), and we are not responsible for any such use of this information.

YOUR CHOICES

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

Opt-out of marketing communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Linked third-party platforms. If you choose to connect to the Service through your social media account or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

Your Privacy Rights. Depending on what laws apply to your personal information, you may have the right to:

- **Request Access to and Portability of Your Personal Information**, including: (i) obtaining access to or a copy of your personal information; and (ii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine-readable format (also known as the “right of data portability”);
- **Request Correction** of your personal information;
- **Request Deletion** of your personal information;
- **Request Restriction of or Object to** our processing of your personal information;
- **Withdraw Your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

Please contact us using the information below if you would like to exercise any of these rights. We will process your requests in accordance with applicable laws.

If your personal information is subject to the applicable data protection laws of the European Economic Area, Switzerland, or the United Kingdom, and you believe our processing of your personal information violates applicable law, you have the right to lodge a complaint with the competent supervisory authority.

- [EEA Data Protection Authorities \(DPAs\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- [UK Information Commissioner’s Office \(ICO\)](#)

OTHER SITES AND SERVICES

The Service may contain links to websites and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites or online services

operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites and online services you use.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

We are headquartered in the Republic of Panama and may use service providers that operate in other countries. Your personal information may be transferred to other locations where privacy laws may not be as protective as those in your state, province, or country.

If we transfer personal information from the European Economic Area, Switzerland, and/or the United Kingdom to a country that does not provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the [EU Standard Contractual Clauses](#).

For more information about the safeguards we use for international transfers of your personal information, please contact us as set forth below.

RETENTION OF PERSONAL INFORMATION

We keep the personal information we collect for as long as you use the Service, or as necessary to fulfill the purpose(s) for which we collected it. There are also other reasons why we may keep personal information. They may include, but are not limited to, providing our Service, resolving disputes, establishing legal defenses, conducting audits, pursuing legitimate business purposes, enforcing our agreements, and complying with applicable laws.

To determine the appropriate retention period for personal information, we may consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, certain risk factors, the purposes for which we process your personal information, and whether we can achieve those purposes through other means.

SUPPLEMENTAL NOTICE FOR EU/UK GDPR

This Supplemental Notice for EU/UK GDPR only applies to our processing of personal information that is subject to the EU or UK GDPR.

The Company's processing of your personal information may be supported by one or more of the following legal bases:

- **Performance of a Contract:** The Company may need to process your personal information to perform our contract with you.
- **Legitimate Interest:** The Company may process your personal information to further our legitimate interests, but only where our interests are not overridden by your interests or fundamental rights and freedoms.

- **Consent:** In some cases, the Company may also rely on your consent to process your personal information.
- **Compliance with Our Legal Obligations:** The Company may process your personal information to comply with our legal obligations.

CHILDREN

The Service is not directed to children under 16 years of age (or other age as required by local law). We do not knowingly collect personal information from children. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or by other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

How to contact us

Email: team@gondi.xyz