

PRIVACY POLICY

NFT HARBOR

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1. Who is responsible for the processing of your personal data?

NFT Holding BV, having its registered seat at Groeneweg 17, 9320 Aalst (Belgium), registered in the Belgian Crossroads Bank for Enterprises under company number 0786.434.824 (hereinafter “NFT Holding”, “we” or “us”), operates the digital platform “NFT HARBOR”, including every webpage belonging to the “nfttharbor.io” domain (hereinafter the “Website”) and including any and all desktop, tablet and mobile applications and application program interfaces (hereinafter “Applications”) and any and all services offered through the digital platform (hereinafter the “Services”). Our digital platform, including Website, Applications and all Services offered through our digital platform, are hereinafter jointly referred to as “NFT HARBOR”.

We undertake to comply with all applicable data protection legislation, including but not limited to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “General Data Protection Regulation”, hereinafter referred to as the “GDPR”). The GDPR can be consulted at any given time via this [link](#).

Since we determine the purposes and means of the processing of the personal data, NFT Holding is to be considered as the “data controller” of the personal data collected via NFT HARBOR.

This privacy policy (hereinafter “Privacy Policy”) explains what personal data we collect and processes from you, the reasons for the processing of your personal data and how that information is used, how we ensure protection of all personal data provided and what rights you have in relation to your personal data. It also specifies the contact details of us being the data controller with whom you may exercise your rights, as well as the contact details of the relevant data protection authority.

Unless otherwise indicated in the text of this Privacy Policy, the capitalised terms used in this Privacy Policy have the same meaning as in the [Terms and Conditions](#), supplemented by other capitalized terms as defined in this Privacy Policy.

2. How do we receive your personal data?

“Personal data” is to be understood as any information that allows to identify you, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

Most of the personal data we process is provided by you yourself when you use our Services offered via NFT HARBOR or contact us, for example when you create a User Account and provide us with your e-mail address. We do, however, also receive technical device and access data which is automatically collected when you interact with our Services. This may, for example, be information on which device you are using (and might be qualified as “personal data” if it enables to identify you). And we may also receive information about you – being personal data – from third parties, such as Gala Games.

As regards some of our Services, we may be unable to provide them to you (at least not optimally) if we do not receive the requested personal data. If particular information is required in connection with a Service (mandatory information), we will inform you by marking it accordingly.

3. What personal data do we process, for what purposes and on what legal ground(s) do we process your personal data?

We undertake to process your personal data in accordance with all applicable data protection legislation. We therefore generally only process your personal data for the purposes explained to you in this Privacy Policy.

3.1. You are a User of our NFT HARBOR Services

We process your personal data for – in general – the provision of our Services to you, to enable you to conduct trades and swaps and payments via our platform, to communicate with you and for the personalization, development and security of our Services. More specifically, via NFT HARBOR, we collect and process the following personal data, for the following purposes, based on the following legal grounds:

PURPOSE	PERSONAL DATA COLLECTED AND PROCESSED	LEGAL GROUND
<i>1. To provide you with our Services:</i>		
- To enable you to register, create and use an account on NFT HARBOR;	- <u>Account Data</u> : e-mail address, username, password.	We process your personal data on the following ground: <u>Article 6(1)(b) GDPR</u> : processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. The contract referred to are our Terms and

		Conditions , based on which we perform our Services.
- To enable you to create a new trade or swap;	- Account Data; - <u>GalaChain Address</u>: in order to see your assets and to be able to create listings on the marketplace, you will need to enter your GalaChain Address; After you filled in your GalaChain Address, we will request you to send a certain amount of gala to the escrow account to confirm you are the owner of the address. The amount will be returned immediately. - <u>NFT Ownership Data</u>: when you enter your GalaChain Address, all NFTs available for sale in your Galla wallet will be displayed on the marketplace, including potential NFT levels.	We process your personal data on the following grounds: Article 6(1)(b) GDPR.
- To enable you to conduct a trade or swap and conduct payments via the NFT HARBOR platform.	- Account Data; - <u>Purchase and Payment Data</u>: such as purchase and payment confirmations received from our third party payment service providers including amount and time of payment; - <u>Age confirmation</u>: when you want to trade or swap NFT's, you will be asked to confirm that you are at least 18 years old.	We process your personal data on the following grounds: Article 6(1)(b) GDPR.
2. To handle requests and complaints;	- Account Data; - Purchase and Payment Data; - NFT Ownership Data; - <u>Messages and conversation content</u>: if you communicate with us (be it by phone, e-mail, post, social media, contact forms	In case you submit a request or complaint to us: Article 6(1)(b) GDPR. In case a request or complaint got submitted to us by another User or third party that concerns your account: Article 6(1)(f) GDPR: processing is

	or any other medium), we may collect the content of your messages; - Any other information you provide to us.	necessary for the purposes of the legitimate interests pursued by the controller or by a third party, whereby the legitimate interest lies in the interest of NFT Holding in being able to offer its Users the normal and proper enjoyment and use of its platform.
3. To send non-promotional information and communication to you: including but not limited to account related information, purchase and payment confirmations, (technical) notifications, contractual updates (including but not limited to updates of our Terms and Conditions and the present Privacy Policy), security alerts, support and other administrative and/or direct messages insofar as these are an integral component of our Services or the Services requested by you.	- Account Data; - Purchase and Payment Data; - NFT Ownership Data; - Messages and conversation content.	Where the communication concerns information you receive as a result of having an account with NFT HARBOR: <u>Article 6(1)(b) GDPR</u>. .
4. To comply with the law: we may use your personal data in case we are required to do so by law or on request of legal officials, national judicial or administrative authorities or in case this is strictly necessary under legal proceedings and/or to safeguard and defend our rights.	- Account Data; - Purchase and Payment Data; - NFT Ownership Data; - Messages and conversation content; - Any other information you provide to us.	Where we process your data on the basis of legal specifications, e.g. obligations under tax law, the legal ground is: <u>Article 6(1)(c) GDPR</u>. Where we process your data under legal proceedings, to safeguard and defend our rights, or to provide cooperation to authorities as prescribed under the Digital Services Act, the legal basis is: <u>Article 6(1)(f) GDPR</u>, whereby our legitimate interests lie in the aforementioned purposes.

3.2. You are a supplier or subcontractor of NFT Holding

PURPOSE	PERSONAL DATA COLLECTED AND PROCESSED	LEGAL GROUND
1. To buy goods and services;	We may collect and process one or more of the following personal data: - Contact information: name, title, position, telephone number, e-mail address, office address and other contact and/or company information; - Messages and conversation content; - <u>Information on the delivery of the product/service</u> and any information on our engagement with the supplier/subcontractor, bank account numbers and any other information on payments; - Any other information you provide to us.	We process your personal data on the following ground: <u>Article 6(1)(b) GDPR</u>: the processing is necessary for the performance of a contract to which the supplier/subcontractor is a party or to take steps at the request of the supplier/subcontractor prior to the conclusion of a contract.

3.3. You are a visitor to the NFT HARBOR Website or Applications

PURPOSE	PERSONAL DATA COLLECTED AND PROCESSED	LEGAL GROUND
1. To answer your question or request for information;	We may collect and process one or more of the following personal data: - Contact information: name, e-mail address; - Messages and conversation content.	We process your personal data on the following ground: <u>Article 6(1)(b) GDPR</u>: the processing is necessary to take pre-contractual measures at your request.
2. For setting and reading cookies.	We may collect and process one or more of the following personal data: - Your electronic identification data: e.g. your IP address, connection times, etc. following a visit to our Website/Application(s) that uses cookies or similar techniques. More information on our use of cookies can be found in our Cookie Policy.	We process your personal data on the following ground: <u>Article 6(1)(a) GDPR</u>: you have consented to the processing of your personal data.

4. How long do we keep your personal data?

Without prejudice to the exercise of your rights as referred to under section 7 of the present Privacy Policy, and unless we are required by law to keep your personal data for a longer period of time and/or unless such longer retention period is necessary for the establishment, execution or substantiation of a legal claim, we store and keep the **personal data of our Users** for as long as your User Account is active. Upon deletion of your User Account (on your request or on our own initiative (in accordance with section 4.12 of the NFT HARBOR Terms and Conditions)), we will delete all your personal data from our records or anonymize it.

Regarding **personal data of visitors to the NFT HARBOR Website or Applications**, the retention period for cookies varies depending on the type of cookie. More information on our use of cookies can be found in our [Cookie Policy](#).

Regarding **personal data of suppliers or subcontractors** of NFT Holding, we keep your personal data for up to 7 years after completion of the service.

5. How do we protect and safeguard your personal data?

We have put in place appropriate technical and organisational measures to protect your personal data against loss, misuse and unlawful processing. These measures include (1) secure communication of data using https, (2) storage of Account Data in an encrypted database, which is only accessible to the designated administrators of the NFT HARBOR platform and (3) servers protected with industry standard anti-malware, virus killers and other protection software.

6. Who has access to your personal data and to whom is it disclosed?

We do not sell, trade, or rent your personal data to others.

Access to your personal data is provided to NFT HARBOR's staff on a "need to know" basis. We shall not disclose your personal data to third parties, unless it is necessary in the context of providing our Services. In this respect, your personal data may be disclosed to:

- affiliated legal entities;
- our general and special legal successors in title;
- third parties to the extent and for the purpose we may be required to do so by law.
- Blockchain Game Partners Inc. dba Gala Games ("Gala Games").

7. What are your rights and how can you exercise them?

As a data subject, you have the following specific rights under the GDPR.

- **Right to information / access**

You have the right to request information on the data we hold about you from us at any time. This information includes, but is not limited to, the categories of data we process, the purposes for which they are processed, the source of the data if not collected directly from you, if applicable, the recipients with whom we have shared your data, and, where possible, the envisaged period for which the personal data will be stored or the criteria used to determine that period. By way of the present Privacy Policy, we already tried to provide you with as much of the aforementioned information as possible,

but don't hesitate to contact us should you want any additional information with regard to the processing of your data.

You can obtain a copy of your data from us free of charge. If you require additional copies, we reserve the right to charge you for these copies.

- **Right to rectification**

You have the right to request that we rectify inaccurate data relating to you.

- **Right to erasure**

You have the right to request that we erase your data, as long as the legal requirements for this are satisfied. This may be the case if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw the consent on which the data processing is based, and there is no other legal basis for processing;
- you lodge an objection to the processing of your data and there are no overriding legitimate reasons for processing, or you object to data processing for direct marketing purposes;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation to which we are subject;

and provided that processing is not required:

- to ensure compliance with a legal obligation that requires us to process your data;
- especially with regard to statutory retention periods;
- to establish, exercise or defend legal claims.

- **Right to object**

You have the right to object to the processing of your data at any time for reasons that arise from your particular situation, as long as data processing is based on your consent, on our legitimate interests or those of a third party. In this case, we will cease to process your data. This does not apply if we can show that there are compelling legitimate grounds for processing that outweigh your interests, or if we need your data for the establishment, exercise or defence of legal claims.

- **Right to data portability**

You have the right to request that we transfer your data – if technically possible – to another responsible party. However, you may only enforce this right if data processing is based on your consent or is necessary for the performance of a contract. Rather than receiving a copy of your data, you may also ask us to submit the data directly to another responsible party specified by you.

- **Right to withdraw your consent.**

You always have the right to withdraw your consent at any time, when the processing of your personal data takes place on the basis of your consent.

You can **exercise your rights** by contacting NFT HARBOR in writing by e-mail or by ordinary letter using the **contact details as adopted below under section 10 of the present Privacy Policy**. Please indicate clearly which of the abovementioned rights you want to exercise.

When you make a request to exercise your rights, we will first verify your identity through appropriate and the least privacy-intrusive means. We do this to prevent your data from falling into the wrong hands.

The exercise of your rights is in principle free of charge. If your request is manifestly unfounded or excessive, we may charge you a reasonable fee considering the administrative costs incurred by us. In the same case, however, we may choose not to act on your request. If necessary, you will always be informed of the reasons.

In any case, we will always inform you of the action taken on your request within a period of one month at the latest. In the case of complex or multiple requests, this deadline may be extended by two months, but we will also inform you of this necessary extension within the month.

8. Complaints

Should you have any complaints about our Privacy Policy or our data collection or processing practices, please don't hesitate to contact us via the contact details indicated below under section 10 of this Privacy Policy.

You also have the right to lodge a complaint with the competent supervisory authority and to seek judicial remedy in relation with the processing of your personal data. For Belgium this is the Data Protection Authority (to be considered as the "Lead Supervisory Authority" in case of cross-boarder processing of your personal data, given our "main establishment" being in Belgium):

Address:

Gegevensbeschermingsautoriteit
Drukpersstraat 35 Rue de la Presse
1000 Brussels

Telephone number: +32 (0)2 274 48 00

Website: <https://www.dataprotectionauthority.be>

Contact: <https://www.dataprotectionauthority.be/citizen/actions/contact>

For other countries of the EU you can find the list of data protection supervisory authorities [here](#).

9. Changes

We reserve the right to revise this Privacy Policy or any part of it from time to time, among other things to comply with new applicable laws and/or regulations, the recommendations of the Data Protection Authorities and the decisions of the courts in this area.

Please review this Privacy Policy periodically for any changes. In case of any updates to this Privacy Policy, you will receive a notification by e-mail. If you do no longer agree with the processing of your personal data by NFT HARBOR in accordance with the updated Privacy Policy, you can contact us in writing by e-mail or by ordinary letter using the contact details as adopted below under section 10 of the present Privacy Policy requesting the deletion of your account.

10. General contact information

If you have any questions, concerns or complaints about our Privacy Policy or our data collection or processing practices, or if you want to report any (potential or actual) security violations to us, please contact us via the following contact details:

NFT HOLDING BV
Address: Groeneweg 17 | 9320 - Aalst | Belgium
E. support@nftlookup.io
W. www.nftharbor.io

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