

Cronos.org

Privacy Notice

Effective date: 6 December 2022

Welcome to Cronos.org Privacy Notice (“Privacy Notice”). Please spend a few minutes to read it carefully before providing us with any information about you or any other person.

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1. Introduction

We respect your privacy, and we are committed to protecting your personal data. This Privacy Notice applies to the processing of personal data by Cronos Labs (“Cronos”, “we”, “us”, “our”) in connection with visiting our website at <https://cronos.org/> (“Site”) or when you otherwise interact with us.

Please note that the Site is not intended for minors below the age of 18 years and we do not knowingly collect data relating to minors.

For products and services provided by other companies, please carefully read the respective privacy notice or policy available on the respective website.

2. Purpose

This Privacy Notice aims to give you information on why and how we collect and process your personal data.

This Privacy Notice informs you about your privacy rights and how the data protection principles set out in the applicable privacy legislation protect you.

It is important that you read this Privacy Notice so that you are fully aware of why and how we are using your data.

3. Who we are

Data Controller

The controller of your personal data is the legal entity that determines the “means” and the “purposes” of any processing activities that it carries out. This Privacy Notice tells you what to expect when Cronos Labs collects personal data about you. Cronos Labs is the controller for this information unless this Privacy Notice specifically states otherwise. You may contact us at: privacy@cronoslabs.org.

If you have any questions or complaints related to this Privacy Notice or our privacy practices, or if you want to exercise [your legal rights](#), please contact us at privacy@cronoslabs.org.

Our duties and your duties in case of changes

We keep our Privacy Notice under regular review. Please check from time to time for new versions of the Privacy Notice. We will also additionally inform you on material changes of this Privacy Notice in a manner which will effectively bring the changes to your attention. It is important that the personal data we hold about you is accurate and up-to-date. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

The Site and any applicable web browser may include links to third-party websites, plug-ins and applications (“Third-Party Sites”). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these Third-Party Sites and are not responsible for their privacy statements and policies. When you leave the Site, we encourage you to read the privacy notice or policy of every Third-Party Site you visit or use.

4. What data we collect about you

Personal data

“Personal data”, or “personal information” means any information that relates to an identified or identifiable living individual. This is a broad definition which includes the specific pieces of

personal data which we have described below. It does not include data which cannot be used to identify an individual person, such as a company registration number.

A “data subject” is an individual who can be identified, directly or indirectly, by personal data. This is usually by reference to an identifier such as a name, identification number, location data or an online identifier.

Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data. It does not include data where the identity has been removed (anonymous data). More information could be found [here](#).

Depending on whether and how you use and/or otherwise interact with the Site, we will collect, use, store and transfer different kinds of personal data about you which we have grouped in categories as follows:

Category of personal data	Examples of specific pieces of personal data
Identity Data	<ul style="list-style-type: none">• username or similar identifiers with our third party service providers, in cases when you share feedback or otherwise contact us via our Discord Developers Chatroom, Github Technical Repositories, Bountysource Bounty Program, Hackerone Bug Bounty Program.
Contact Data	<ul style="list-style-type: none">• email address.
Financial Data	<ul style="list-style-type: none">• virtual currency accounts;• external account details.
Transactional Data	<ul style="list-style-type: none">• details about payments to and from you and other information available on the public blockchain.
Technical Data	<ul style="list-style-type: none">• internet connectivity data;• internet protocol (IP) address;• operator and carrier data;• login data;• browser type and version;• device type, category and model;• time zone setting and location data;

	<ul style="list-style-type: none"> ● language data; ● application version and SDK version; ● browser plug-in types and versions; ● operating system and platform; ● diagnostics data such as crash logs and any other data we collect for the purposes of measuring technical diagnostics; ● and other information stored on or available regarding the devices you allow us access to when you visit the Site.
Profile Data	<ul style="list-style-type: none"> ● your interests, preferences and feedback, ● other information generated by you when you communicate with us.
Usage Data	<ul style="list-style-type: none"> ● information about how you use the Site and other offerings made available by us, including: <ul style="list-style-type: none"> ○ interaction type and time, ○ event time, name and source.
Marketing and Communications Data	<ul style="list-style-type: none"> ● your preferences in receiving marketing from us or third parties, <ul style="list-style-type: none"> ○ your communication preferences, ○ your survey responses.

5. How we collect your data

We use different methods to collect information from and about you, including through:

Direct interactions. You may give us your [Identity Data](#), [Contact Data](#), [Financial Data](#), [Profile Data](#) and [Marketing and Communications Data](#) by directly interacting with us, including by filling in forms, by email or otherwise. This includes personal data you provide when you:

- visit our Site;
- request marketing to be sent to you, for example by subscribing to our newsletters;
- enter a competition, promotion or survey;
- give us feedback or contact us.

Automated technologies or interactions. As you interact with us via our Site, we will automatically collect [Technical Data](#) about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We will also collect [Transactional Data](#) and [Usage Data](#). You may find more information about how we use cookies through the Privacy Preference Center accessible through the cookie banner on our Site.

6. How we use your data

Lawful basis

We will only use your personal data when the applicable legislation allows us to. In other words, we have to ensure that we have a lawful basis for such use.

Most commonly, we will use your personal data in the following circumstances:

- **performance of a contract:** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract;
- **legitimate interests:** means our interests (or those of a third party), where we make sure we use this basis as far as your interests and individual rights do not override those interests;
- **compliance with a legal obligation:** means processing your personal data where we need to comply with a legal obligation we are subject to;
- **consent:** means freely given, specific, informed and unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to you; under specific circumstances this consent should be explicit – if this is the case, we will ask for it properly.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose and/or activity	Categories of personal data	Lawful basis for processing
To prevent abuse of the features made available through the Site or of the rules governing different promotional campaigns organized by us or on our behalf	<ul style="list-style-type: none">● Identity Data● Contact Data● Financial Data	<ul style="list-style-type: none">● Legitimate interests● Performance of a contract

<p>To manage our relationship with you which will include asking you to leave a review, take a survey or keeping you informed of the latest updates on the Cronos Chain</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Profile Data ● Marketing and Communications Data 	<ul style="list-style-type: none"> ● Performance of a contract ● Consent, if required
<p>To obey laws and regulations which apply to us and respond to complaints and resolve them</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Transactional Data 	<ul style="list-style-type: none"> ● Compliance with a legal obligation ● Legitimate interests: to ensure effective dealing with complaints
<p>To enable you to partake in a prize draw, competition or other promotional campaigns organized by us or on our behalf</p>	<ul style="list-style-type: none"> ● Contact Data ● Financial Data ● Marketing and Communications Data 	<ul style="list-style-type: none"> ● Performance of a contract ● Consent, if required
<p>To administer and protect our business, the Site, and social media channels including bans, troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data</p>	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Transactional Data 	<ul style="list-style-type: none"> ● Legitimate interests: to run our business, provision of administration and IT services, network security and in the context of a business reorganization or group restructuring exercise

Marketing

We may use your Contact Data and Marketing and Communications Data to send you the latest updates on the Cronos chain including updates of chain protocol and ecosystem development.

You will receive marketing communications from us if you have requested information from us and consented to receive marketing communications.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Further, you can let us know directly that you prefer not to receive any marketing messages by emailing privacy@cronoslabs.org.

Where you opt-out of receiving marketing messages, this will not apply to service messages which are directly related to the use of our Site and the Cronos chain (e.g. maintenance, change in the documentation and so forth).

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information about the cookies used on our Site and how to control them, please review the Privacy Preference Center accessible through the cookie banner on our Site.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Sale or transfer of business

We may also need to process your data in connection with or during the negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving all or a part of our shares, business or assets. This will be based on our legitimate interests in carrying out such transaction, or to meet our legal obligations.

7. Disclosures of your data

We share your personal data with our third-party service providers, agents, subcontractors and other associated organizations, in order to complete tasks related to the use of the Site on our behalf, as well as to organize and carry out promotional campaigns organized on our behalf. When using third-party service providers, they are required to respect the security of your personal data and to treat it in accordance with the law.

We may pass your personal data to the following entities:

- companies and organizations that assist us in providing any of the Site's features; and

- any third party because of any restructure, sale or acquisition of our group or any affiliates, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us.

8. International transfers

Some of our third-party service providers may require international transfers of personal data. We follow the specific legal framework applicable to such transfers. For example and where applicable, whenever we transfer your personal data out of the EEA or the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- the country to which we transfer your personal data has been deemed to provide an [adequate level of protection](#) for personal data by the European Commission;
- a specific contract approved by the European Commission or the UK government, which gives safeguards to the processing of personal data, the so-called Standard Contractual Clauses, as applicable to your particular case.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA or the UK.

9. Data security

While there is an inherent risk in any data being shared over the internet, we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, damaged, or accessed in an unauthorised or unlawful way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Depending on the nature of the risks presented by the proposed processing of your personal data, we will have in place the following appropriate security measures:

- **organisational measures** (including but not limited to staff training and policy development);
- **technical measures** (including but not limited to physical protection of data, pseudonymization and encryption); and
- **securing ongoing availability, integrity, and accessibility** (including but not limited to ensuring appropriate back-ups of personal data are held).

We have put in place procedures to deal with any suspected personal data breach and will notify you and any relevant regulator of a breach where we are legally required to do so.

10. Data retention

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Here are some exemplary factors which we usually consider when determining how long we need to retain your personal data:

- in the event of a complaint;
- if we reasonably consider that we need to keep information to defend possible future legal claims (e.g. email addresses and content, chats, letters), it will be kept in accordance with the statutory limitation period applicable following the end of our relationship;
- to comply with any applicable legal and/or regulatory requirements with respect to certain types of personal data, for example if information is needed for audit purposes;
- in accordance with our legitimate business need to prevent abuse of the promotions that we launch. We will retain your personal data for the time of the promotion and for a certain period after its end to prevent the appearance of abusive behaviour.

Please note that under certain condition(s), you can ask us to delete your data: see [your legal rights](#) below for further information. We will honor your deletion request ONLY if the condition(s) is met.

11. Your legal rights

You have rights we need to make you aware of. The rights available to you depend on our reason for processing your personal data. If you need more detailed information or wish to exercise any of the rights set out below, please [contact us](#).

You may:

- request access to your personal data, which enables you to obtain confirmation of whether we are processing your personal data, to receive a copy of the personal data we hold about you and information regarding how your personal data is being used by us;
- request rectification of your personal data by asking us to rectify information you think is inaccurate and to complete information you think is incomplete, though we may need to verify the accuracy of the new data you provide to us;
- request erasure of your personal data by asking us to delete or remove personal data we hold about you; note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you;
- object to the processing of your personal data, where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on

your fundamental rights and freedoms; in some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;

- request restriction of processing your personal data, which enables you to ask us to suspend the processing of your personal data, if you want us to establish the data accuracy; where our use of the data is unlawful, but you do not want us to erase it; where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, or if you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it;
- request the transfer of your personal data to you or to a third party, and we will provide to you, or a third party you have chosen (where technically feasible), your personal data in a structured, commonly used, machine-readable format; note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- complain to any relevant supervisory authority about any perceived violation and to seek compensation for damages in the courts.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is manifestly unfounded or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

Period for replying to a legitimate request

We shall reply to a legitimate request within the legally prescribed period according to the applicable legislation. If you are a resident of the EEA or the UK, the statutory period for us to reply to a legitimate request is one month. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

Please note that we may request that you provide some details necessary to verify your identity when you request to exercise a legal right regarding your personal data.