



Patex

PRIVACY NOTICE

LAST UPDATED: AUGUST 22, 2023

1. WHY DO YOU NEED THIS PRIVACY NOTICE?

We encourage you to carefully read this Privacy Notice as it provides you with information about your personal data being processed in connection with your access to and use of the Services.

In this Privacy Notice, personal data and personal information are used as synonyms and mean any information that directly or indirectly identifies you as an individual. In this Privacy Notice we explain which types of personal data we hold on you, how we collect and process such data, how long we keep it, and so on.

2 . WHERE CAN YOU FIND THE DEFINITIONS?

Unless otherwise provided in this Privacy Notice, capitalized terms used in this Privacy Notice have the meaning determined in the Patex Terms of Service (the “Terms”). We encourage you to read the Terms carefully as they affect your obligations and legal rights.

3 . WHO ARE WE AND HOW TO REACH US?

When we say “we”, “us”, or “our”, we mean CPEX DLT Inc., a BVI business company. With respect to personal data collected when you access and use the Services, we act as a data controller, meaning that we solely determine what data collected and the purposes and means of data processing.

We process your personal data in accordance with this Privacy Notice and we endeavor to comply with the applicable data protection legislation.

If you have any questions regarding this Privacy Notice or the processing of your personal data, do not hesitate to contact us via the following contact details:

Name: CPEX DLT Inc.

Address: Intershore Chambers, PO Box 4342, Road Town, Tortola, VG1110, British Virgin Islands.

Email: legal@patex.io

4 . WHAT PERSONAL DATA DO WE COLLECT?

The categories of personal data we collect depend on how you interact with us, use the Services, and the requirements of the applicable laws. We collect and process the following types of personal data as outlined below. Please note that we may also collect certain other information, which may be required under the applicable laws.

Category of Data		
Examples	Description	Other Comments
Wallet Data		
Wallet Addresses	"Wallet Address" means a public address on the respective blockchain network associated with the relevant Wallet. It constitutes a random set of symbols assigned by the respective blockchain network.	While processing the Wallet Addresses and transactions associated therewith, we can not identify you as an individual, because it is impossible to identify you having only a random set of symbols. Therefore, generally, this data is not personal. However, under the applicable data protection legislation, if such data is combined with certain other data (such as a name, email address, username, etc.) it may become possible to identify you as an individual and thus, such a set of data may be deemed personal information.
Wallet balances	As the Wallet Address is publicly available, any person, including us, may see the amount of Digital Assets stored in the respective Wallet.	
information about transactions associated with the Wallet Address	This may include information about transaction amount, time and date, transaction ID and status, Wallet Addresses of sender and recipient, etc.	
Account Data		
email address	-	Email address may be considered personal data.

email address	-	Email address may be considered personal data.
password	-	-
username	This does not have to be personal data.	The username is generated automatically based on your email address.
internal ID email address	When an Account is created, a unique internal ID, which essentially is a random identification number, will be automatically assigned to each such account.	The internal ID is technically necessary to operate the Patex Explorer and used for internal purposes to count the users. Without any other pieces of data, the internal ID does not identify you as an individual.
Third-Party Account Data	This may include your email address, authentication token or certain other data received from your Third-Party Account to the extent notified to you when you link such a Third-Party Account to the Account.	<p>General. You may use a third-party account, such as Google Account (the "Third-Party Account") to create, verify, and log in to your Account. In this case, we may access certain personal data associated with such Third-Party Account as described in this Privacy Notice.</p> <p>You may deactivate the connection between your Account and Third-Party Account by contacting us or using the functionality of the respective Third-Party Account. In the latter case, as soon as we become aware of such deactivation, we will delete the respective information stored on our servers, except for the personal data that becomes a part of your Account, if any.</p> <p>Role. With respect to the Third-Party Account Data, we act as a data controller. However, the respective service provider of such a Third-Party Account may use your personal data for any of its own purposes, in which case, it acts as an independent data controller. We encourage you to review the privacy policy, notice, or statement of every service provider whose Third-Party Account you use.</p>

Referral Data

referral ID	Referral ID is a unique identification number used for internal purposes to identify you as a user, who shares a referral link and invites others to use the Patex Network. It constitutes a set of random letters and numbers.	When you participate in our referral program, we generate a referral link and automatically assign you a referral ID. Invited users are also assigned with a unique internal identification number to identify referred users. Referral ID, as such, is a random set of symbols and we can not identify you as an individual without additional pieces of data.
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Application Data

data requested by us or data that you choose to provide us with	This may include, for instance, contact details, name, country of residence, experience, etc. Please do not provide personal data unless it is reasonably necessary or requested by us.	The Website may contain certain application forms that you may fill in at your discretion. We collect the Application Data when you submit an application for the purpose of becoming a validator of the Patex Network and get certain rewards in connection therewith.
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Analytical Data

data about tag firing	This includes information about how the Website is used, and how and what tags are deployed.	<p>Google. Analytical Data are collected via Google Tag Manager, operated by Google Ireland Limited and its affiliates, including Google LLC (“Google”).</p> <p>Tags. Google Tag Manager gathers information by means of tags, which are essentially segments of code integrated into the Website, that fire in case of the occurrence of certain triggers established by us, such as, for instance, an event when a form is submitted. According to Google Tag Manager documentation all gathered data are aggregated and do not include IP addresses or any measurement identifiers associated with a particular person. In other words, we cannot identify you and your actions from the other Website visitors and their actions. More information regarding Google Tag Manager is available here.</p> <p>Role. With respect to Analytical Data, Google acts as our data processor. However, Google may use such personal data for any of its own purposes, in which case, Google acts as an independent data controller. You can learn more about how Google processes personal data in Google’s privacy policy.</p>
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Contact Data		
contact details	This may include your email address, phone number or social media contacts, such as Telegram, WhatsApp, etc.	This depends on how you contact us.
any other data requested by us or data that you choose to provide us with	This may include your name, transaction details, or other information.	Please do not provide personal data unless it is reasonably necessary or requested by us.

5 . HOW DO WE USE PERSONAL DATA?

Category of Data	Description	Lawful Basis for Processing
Wallet Data	To enable you to use certain functionality of the Services.	To perform a contract with you. It is impossible to use certain functionality of the Services without having a Wallet.
	To carry out certain transactions, arising out and in connection with your use of the Services.	Our legitimate interest as well as the interests of other users to prevent and detect fraud and abuse, and protect the security of our users.
Account Data	To create and register an Account to access and use certain functionality of the Patex Explorer.	To perform a contract with you.
		If you act on behalf of a legal entity — our legitimate interest to ensure the access and use of the Patex Explorer by the legal entity you represent.
Referral Data	To enable you to participate in our referral program.	To perform a contract with you.
	To count you as a user, who invites others to use the Services.	
	To accrue the relevant referral remuneration to you, if any.	
	To count the invited users.	Our legitimate interest to ensure the participation in our referral program by the respective user, who invited you to use the Services.

Application Data	To enable you to apply for and participate in a program, event, etc., associated with the respective application.	To take steps at your request prior to entering into a contract, and further to perform a contract with you.
	To perform the activities associated with the respective application.	
Analytical Data	To analyze the Website stability, performance, and installation quality.	Our legitimate interest to improve the functionality, usability, user flow, experience and interface of the Website.
	To establish triggers that cause a particular tag to fire, such as, for instance, events when a form is submitted or when a video is played	
	To create variables that can be used to simplify and automate tag configurations	
Contact Data	To respond to your inquiry.	Our legitimate interest to respond to your inquiry.

6 . HOW LONG DO WE PROCESS YOUR DATA?

As a general rule, we keep personal data as long as it is necessary for the purposes it was collected. We may process certain personal data longer than outlined below, if it is necessary:

- a. to meet our legal obligations under the applicable law;
- b. in relation to anticipated or pending legal proceedings; or
- c. to protect our rights and legitimate interests or those of third parties.

Category of Data	Storage Period	Rationale
Wallet Data	As long as you keep your Wallet connected to the respective Patex Product. Please note that due to the nature of a blockchain, the Wallet Data may be stored permanently on the applicable blockchain (not by us).	We need such data for the purposes outlined above.

Account Data	As long as you keep your Account within the Patex Explorer.	We process your Account Data as long as it is necessary for the operation of your Account.
Referral Data	For one (1) year from the termination of your participation in the referral program or completion of all transactions associated therewith, whichever is later.	We set this retention period due to the statutes of limitations established in the Terms.
Application Data	For one (1) year from the termination of your participation in the referral program or completion of all transactions associated therewith, whichever is later.	
Analytical Data	For fourteen (14) days after being collected.	We need such data for the purposes outlined in this Privacy Notice above.
Contact Data	For one (1) year from the last date when you contacted us regarding the same matter.	We set this retention period due to the statutes of limitations established in the Terms.

7 . HOW DO WE SHARE YOUR DATA?

GENERAL

We do not sell or rent out your data. However, we may share your personal data in accordance with this Privacy Notice, applicable legislation, or with your consent, in each case for the purposes of and if it is reasonably necessary:

- a. to provide you with access to the Services and performance of our undertakings with you;
- b. for compliance with the applicable laws and regulations; or
- c. for our legitimate interest to maintain, improve and develop the Services.

Please note that if we share any portion of your personal data with third persons, we will endeavor to secure such transfer using appropriate legal, organizational, and technical measures.

RECIPIENTS

Given the purposes outlined above, your personal information is shared with the following categories of recipients:

- a. Affiliates;
- b. analytical solution providers, such as Google Tag Manager;
- c. email verification service providers;
- d. support and technical teams;
- e. marketing teams;
- f. hosting service providers;
- g. government authorities, upon their request or if necessary to comply with our legal obligations;
- h. another entity if we sell or otherwise transfer the Services or their part; and
- j. other third-party solutions, which may be from time to time integrated in relation to the Services.

8 . WHAT ARE THE FEATURES OF BLOCKCHAIN DATA PROCESSING?

Please note that Wallet Data may interact with public decentralized blockchain infrastructures and blockchain-based software, including smart-contracts, that work autonomously. The data entered in a public decentralized blockchain is distributed via the nodes that simultaneously store all records entered into the blockchain.

By design, blockchain records cannot be changed or deleted and are said to be “immutable”. Please be aware that any transaction within a blockchain is irreversible and information entered into a blockchain cannot be deleted or changed.

Therefore, your ability to exercise certain data protection rights or abilities may be limited.

In addition, due to the blockchain's nature, the information that was entered in a blockchain will be publicly available and we may neither control such information nor manage access to it. Once you start carrying out transactions, certain data, which may be considered personal, will become publicly available on a blockchain. The ultimate decision whether to transact on a blockchain or carry out any transactions rests with you.

9 . ARE YOU SUBJECT TO AUTOMATED DECISION-MAKING?

Automated decision-making is the process of making a decision by automated means without any human influence on the outcomes. We do not make any automated decisions based on your personal data. If we intend to process your personal data by any automated means, we will do our best to inform you about the same prior to such processing.

10 . WHAT ABOUT INTERACTING WITH THIRD-PARTY LINKS?

The Website may include links and social media plugins to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share certain data about you. We do not control these third-party websites and applications, and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy policy/notice/statement of every website or application you visit.

11 . WHAT DATA SUBJECT RIGHTS DO YOU HAVE?

GENERAL

According to the applicable data protection legislation, you may have the rights outlined below.

In order to exercise your rights as a data subject, we may request certain information from you to verify your identity and confirm that you have the right to exercise such rights.

BLOCKCHAIN DATA PROCESSING

Please note that when you interact with a blockchain, we may not be able to exercise certain rights that you may have pursuant to the applicable data protection legislation with respect to the Wallet Data. For instance, we may not be able to ensure that such personal data is deleted, corrected, or restricted. You may learn more above in the “What Are the Features of Blockchain Data Processing?” section of this Privacy Notice.

DATA SUBJECT RIGHTS

According to the applicable legislation, you may have the following rights:

Rights	Description
Right to access your personal data	This enables you to ask us whether we process your personal data. If we process your data, you may request certain information about the processing activity and/or a copy of the personal data we hold about you, and check that we are lawfully processing it.
Right to rectification of the personal data	This enables you to have any incomplete or inaccurate data we hold about you completed or rectified, though we may need to verify the accuracy of the new data you provide to us.
Right to erasure of your personal data (commonly known as a “right to be forgotten”)	This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.
Right to erasure of your personal data (commonly known as a “right to be forgotten”)	This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal or technical reasons which will be notified to you, if applicable, at the time of your request

Right to object to processing of your personal data	This enables you to object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
Right to restrict the processing of your personal data	This enables you to ask us to suspend the processing of your personal data in the following scenarios: (i) if you want us to establish the data's accuracy, (ii) where our use of the data is unlawful but you do not want us to erase it, (iii) 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, (iv) 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 (commonly known as a "right to the data portability")	We will provide to you, or a third party you have chosen, 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
Right to withdraw consent	You may withdraw your consent at any time where we are relying on consent to process your personal data.
Right not to be subject to automated decision-making	If and to the extent applicable, you reserve the right not to be subject to a decision based solely on automated processing of data, including profiling, which produces legal effects concerning you or similarly significantly affecting you.
Right to file a complaint	You may file a complaint with a relevant supervisory authority in case we violate your rights or obligations imposed on us under the applicable legislation. The relevant supervisory authority will particularly depend on where you are located.

12 . DO WE PROCESS CHILDREN'S PERSONAL DATA?

The Services are not intended for the use of children (under 18 years old or older, if the country of your residence determines a higher age restriction). We do not knowingly market to, solicit, process, collect, or use personal data of children.

If we become aware that a child has provided us with personal information, we will use commercially reasonable efforts to delete such information from our database. If you are the parent or legal guardian of a child and believe that we have collected personal information from your child, please contact us.

13 . CAN WE MODIFY AND UPDATE THIS PRIVACY NOTICE?

We keep our Privacy Notice under regular review and we may update it at any time. If we make any changes to this document, we will change the “Last Updated” date above. Please review this Privacy Notice to check for the updates. If we make substantial changes to the way we treat your personal information, we will display a notice on the Website.