

PRIVACY POLICY

Last updated: 30 July 2018

Please carefully read this Privacy Policy ("Policy"), which governs how OSA **Decentralized Limited**, a company, incorporated in accordance with the laws of the British Virgin Islands under 1978260, number or other authorized Company Party, as the case may be ("Company", "we"), collects, uses and discloses information, when you access or use the website https://osadc.io/ (collectively with all of its subdomains and all their respective pages, the "Website"), the online services at the Website ("Services"), or when you otherwise interact with us.

This Policy is an integral part of the Terms of Use for Website.

隐私政策

最近更新日期: 2018 年 7 月 30 日

请仔细阅读本隐私政策("政策"),当您访问或使用本网站 https://osadc.io/(包括其全部子域名和所有相应页面,统称为"网站")、网站上的在线服务("服务")或您以其他方式与我们互动时,本政策对 OSA Decentralized Limited (一家根据英属维尔京群岛法律成立的公司,注册号为1978260)或其他授权公司方(视具体情况而定,或称为"公司"、"我们")收集、使用和披露信息的方式进行制约。

本政策构成网站使用条款的组成部分。

ARTICLE 1. Definitions

1.1. In addition to the definitions contained elsewhere in the text of this Policy, the following terms and expressions shall have the following meaning ascribed to them for use in this Policy:

"Company Parties" means the Company and its respective past, present and future employees, officers, directors, contractors, consultants,

第1条定义

1.1. 除非本政策对定义另有规定,否则 ,下列术语和表达应具有以下含义 :

"公司各方"是指公司及其各自过去、现在和未来的员工、管理人员、董事、承包商、咨询师、律师、会计师、财务顾问、股东、供货商、供应商、服务提供商、母公司、子公司、附属公司、代理人、代表、前任、继任人和受让人。"公

attorneys, accountants, advisors, financial equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns. "Company Party" means one of the foregoing, as the case may be.

"Consent" has the meaning set out for this term in Article 4.1 hereof.

"**EU Persons**" means Personal Data subjects who are in the European Union.

"GDPR" means Regulation (EU) 2016/679 of the European Parliament and 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 (General Data Protection Regulation).

"Personal Data" means any information relating an identified or identifiable natural (data subject); person identifiable natural person is one who can be identified, directly or indirectly, 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 physical, physiological, the genetic, mental, economic, cultural or social identity of that natural person.

"**Processing**" means any operation or set of operations which is performed on Personal

司方"是指上述任何一方,视情况而 定。

"同意"一词的意思在第 4.1 条中规定。

"**欧盟个人**"指的是位于欧洲联盟的 个人数据主体。

"GDPR"指的是欧洲议会和理事会于 2016 年 4 月 27 日就处理个人数据及对该等数据的自由移动而保护自然人的 (EU) 2016/679 条例,同时废止 95/46/EC 指令(通用数据保护条例)。

"个人数据"指的是与已识别或可识别的自然人(数据主体)相关的任何信息;可识别的自然人是指可以直接或间接被识别的人,尤其是通过述及名字、身份号码、位置数据、在线识别标记或者述及该自然人特有的体格、生理、遗传、精神、经济、文化或社会身份的一个或多个因素等识别标记。

"**处理**"指的是对个人数据或个人数据或个人数据集进行的任何操作或操作集,无论是否通过自动化手段,例如收集、记录、组织、整理、存储、改编或修改、检索、咨询、使用、通过传递进行披露、散布,或者使之可用、对齐或排列组合、限制、擦除或销毁。"**处理**"、"**已处理**"和其他类似术语应当做相应解释。

"**网站使用条款**"是指网站上提供的 描述网站使用条款的文件(可能会 不时修改)。

"用户账户"是指公司(或公司方, 视情况而定)向您提供的账户,以 便改善您的网站体验和服务使用, 并获取公司各方提供的特定附加产 品、实用工具和供给物。

Data or on sets of Personal Data, whether or not automated means, such as collection, recording, organization, structuring, storage, adaptation alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure destruction. "Process", "Processed" and other similar shall be construed terms accordingly.

"Terms of Use for Website" means the document describing the terms of use for the Website available on the Website (as may be amended from time to time).

"User Account" means an account which may be provided to you by the Company (or a Company Party, as the case may be) for the purpose of improving your experience on the Website and use of the Services, as well as obtaining access to specific additional products, utilities and offerings provided by Company Parties.

ARTICLE 2. Applicability and Acceptance of Policy

- 2.1. This Policy defines the Personal Data, explains how Personal Data is used and Processed and instances when the Company shares or permits collection of the Personal Data by the Company Parties or state authorities.
 - 2.2. This Policy shall come into effect at the moment you first access the Website or

第 2 条 政策适用性和接受

- 2.1. 本政策对个人数据进行了定义并说明了如何使用和处理个人数据,以及公司分享或允许公司各方或国家当局收集个人数据的情形。
- 2.2. 当您首次访问网站或开始使用任何服务时,本政策即生效。通过访问、浏览或使用本网站和/或任何服务,您不可撤销且无条件地接受并遵守本政策的条款,没有任何豁免、限制和例外情形。

commence use of any of the Services. By accessing, browsing or using the Website and/or any of the Services you irrevocably and unconditionally accept and adhere to provisions of this Policy without any exemptions, limitations and exclusions.

If you access the Website or use any of the Services on behalf of a business (whether registered or operating without registration), that business hereby accepts this Policy.

In the event you disagree with any provision of this Policy or would not like to provide your consent for Processing of your Personal Data, you shall cease using the Website or any of the Services immediately.

- 如果您代表企业(无论企业是否注 册)访问网站或使用任何服务,则 您所代表企业特此接受本政策。
- 2.3. 如果您不同意本政策的任何规定或 不同意处理您的个人数据,请立即 停止使用本网站或其任何服务。

ARTICLE 3. Legal Grounds for Personal Data Processing

- 3.1. Processing of Personal Data is permitted only on the following legal grounds:
 - 3.1.1. Consent to Personal

 Data Processing,

 when the data subject

 has given Consent to

 the Processing of his or

 her Personal Data for

 one or more specific

 purposes;
 - 3.1.2. **contractual relationships**, where

 the Personal Data

 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

第 3 条 个人数据处理的法律依据

- 3.1. 仅根据如下法律依据方可允许处理个 人数据:
 - 3.1.1. **同意个人数据处理**,当数 据主体同意出于一个或多 个特定目的而处理其个人 数据时;
 - 3.1.2. **合同关系**,其中,为了执 行数据主体为当事方的合 同,或者为了在签订合同 之前应数据主体的请求采 取步骤而有必要进行个人 数据处理时;
 - 3.1.3. 控制者的法律义务,当为 了遵守控制者受其约束的 法律义务而有必要进行处 理时;
 - 3.1.4. **重大利益保护**,当为了保护数据主体或其他自然人的重大利益而有必要进行处理时;

- entering into a contract;
- 3.1.3. **controller's legal obligation**, when the Processing is necessary for compliance with a legal obligation to which the controller is subject;
- 3.1.4. **vital interests protection**, when the
 Processing is necessary
 in order to protect the
 vital interests of the
 data subject or of
 another natural
 person;
- 3.1.5. **public interests compliance**, when the Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- 3.1.6. controller's legitimate interests, when the Processing is the necessary for of purposes the legitimate interests pursued by the controller or by a third party, except where such interests are overridden bv the interests or fundamental rights and freedoms of the data subject which require protection of Personal Data, in particular where the data subject is a child.

- 3.1.5. **符合公共利益**, 当出于公 共利益或官方当局授权控 制者执行任务而有必要进 行处理时;
- 3.1.6. 控制者的合法利益,当出于控制者或第三方追求的合法利益之目的而有必要进行处理时,除非该等利益需让步于数据主体需要个人数据保护的的基本权利和自由的利益,尤其是当数据主体是儿童时。
- 3.2. 我们基于以下情况处理您的个人数据:
 - 3.2.1. **出于执行合同的必要**,因此,当我们与您订立合同时,我们将处理您的个人数据,以便履行该合同(尤其是向您提供服务)
 - 3.2.2. **获得了您的同意授权**,您 根据第 4 条内容同意我们 (同意个人数据处理):
 - 3.2.3. 出于遵守我们的法律义务的必要,尤其是当我们有义务响应法院命令或监管者时:
 - 3.2.4. **出于行使我们合法利益的 必要**, 如第 3.3 条更详细 描述:或者
 - 3.2.5. **获得适用法律的许可**,如果个人数据处理的相应法律依据没有在本政策的条款中提及或与之矛盾。

欢迎您联系我们,以获取我们关于 对您的个人数据进行特定处理所依 赖的法律依据的更多信息。

3.3. 我们出于一系列合法利益处理个人数据,包括为了提供和改进服务、管理我们与您的关系和我们的业务、用于营销,以及为了行使我们的权利和履行我们的责任。特别地,我们处理您的个人数据,以便:

- 3.2. We Process your Personal Data on the basis that it is:
 - 3.2.1. **necessary** for the performance of а therefore, contract. where we have contract with you, we will process vour Personal Data in order to fulfil that contract particular, provide you with the Services);
 - 3.2.2. authorized by your Consent, which you give us as it is set out in Article 4 (Consent to Personal Data Processing) hereof;
 - 3.2.3. necessary for compliance with our legal obligation, in particular, when we are obliged to respond to a court order or a regulator;
 - 3.2.4. necessary for performance our legitimate interests, as it is more detailed described in Article 3.3 hereof; or
 - 3.2.5. permitted by applicable legislation, if the respective legal ground for Personal Data Processing is not mentioned in, or contradicts to, the provisions of this Policy.

You are welcome to contact us for further information on the legal grounds that we rely on in relation to any specific

- 3.3.1. 设立和管理您的用户账户 ,提供技术和客户支持及 培训、验证您的身份,以 及发送重要的账户、订阅 和服务信息:
- 3.3.2. 管理我们与您的关系、我们的业务和我们的第三方提供商(例如发送发票)
- 3.3.3. 推送和推荐定制的内容, 例如新闻、研究、报告和 商业信息。我们分析您使 用我们服务的方式, 从而 向您推荐我们认为您也将 感兴趣的功能或服务, 同 时便于我们让我们的服务 更具用户友好性;
- 3.3.4. 个性化您对我们服务的体验。我们可能保留您的浏览和使用信息,从而让您在我们服务内的搜索更具相关性,同时使用这些洞察在我们的网站和应用程序上为您推送针对性的广告;
- 3.3.5. 在我们的服务之间分享您的个人数据,以便我们将交付给您的所有服务做得更加直观(例如,不需要您多次输入相同的数据);
- 3.3.6. 联系您进行您选择参与的 调查或投票或相关事宜, 以及分析所收集的数据用 于市场研究之目的;
- 3.3.7. 显示您选择发表、分享、 上传或提供给聊天室、消息服务和社区及事件论坛 (包括社区和事件档案 中)的信息,以及用于相 关的协作、点对点连接、 游戏和信息交换:

- Processing of your Personal Data.
- 3.3. We Process the Personal Data for a number of legitimate interests, including to provide and improve the Services, administer our relationship with you and our business, for marketing and in order to exercise our rights and responsibilities. In particular, we Process the Personal Data to:
 - 3.3.1. set up and administer your User Account, provide technical and customer support and training, verify your identity, and send important account, subscription and Service information;
 - 3.3.2. administer our relationship with you, our business and our third-party providers (e.g., to send invoices);
 - 3.3.3. deliver and suggest tailored content such as news, research, reports and business information. We analyse the way you use our Services to make suggestions to you for features or Services that we believe you will also be interested in, and so that we can make our Services more user-friendly;
 - 3.3.4. personalize your experience with our Services. We may

- 3.3.8. 进行内部研究和开发,从 而改进、测试和增强我们 服务的特性和功能;
- 3.3.9. 为您提供法律允许的营销内容:
- 3.3.10. 满足我们的内部和外部审 计要求,包括我们的信息 安全义务;
- 3.3.11. 行使、保护和/或执行我们 或他人的权利、隐私、安 全、网络、系统和财产;
- 3.3.12. 防范、检测或调查犯罪、 欺诈或其他违法违规行为 ;
- 3.3.13. 防范或检测公司各方或第 三人发生的任何损失;
- 3.3.14. 遵从法院、执法机构、监管机构和其他公共和政府当局的要求,包括位于您居住国之外者:
- 3.3.15. 使公司各方免于索赔;
- 3.3.16. 遵从适用于我们或我们的 第三方合作伙伴的法律和 法规。

我们依赖于合法利益作为处理您个人数据的合法依据时,我们还要在那些利益和您的利益、基本权利以及自由之间取得平衡。如需更多有关这种平衡做法执行方式的信息,请通过发送电子邮件联系我们:company@osadc.io。

3.4. 公司各方不会故意收集十六岁以下 儿童的个人可识别信息。如果您未 满十六岁,则您必须征得您的父母 或监护人的许可方可使用本网站和 服务。

- retain your browsing and usage information to make your searches within our Services more relevant and use those insights to target advertising to you online on our websites and apps;
- 3.3.5. share your Personal Data across our Services so that we can make of all the Services we deliver to you more intuitive (e.g., rather than requiring you to enter the same data many times);
- 3.3.6. contact you in relation to, and conduct, surveys or polls you choose to take part in and to analyse the data collected for market research purposes;
- 3.3.7. display information you choose to post, share, upload make or available chat in rooms, messaging services, and community and event forums (including in community and event profiles) and for related collaboration, peer connection, games and information exchange;
- 3.3.8. conduct internal research and development and to improve, test and enhance the features and functions of our Services;

- 3.3.9. provide you with marketing as permitted by law;
- 3.3.10. meet our internal and external audit requirements, including our information security obligations;
- 3.3.11. exercise, protect and/or enforce our rights, privacy, safety, networks, systems and property, or those of other persons;
- 3.3.12. prevent, detect or investigate a crime, fraud or other breach of law or requirement;
- 3.3.13. prevent or detect any loss incurred by Company Parties or third persons;
- 3.3.14. comply with requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, including where they are outside your country of residence;
- 3.3.15. defend Company Parties from claims;
- 3.3.16. comply with laws and regulations that apply to us or third parties with whom we work.

Where we rely on legitimate interests as a lawful ground for Processing your Personal Data, we balance those interests against your interests, fundamental rights and

freedoms. For more information on how this balancing exercise has been carried out, please contact us by sending an email to: company@osadc.io.

3.4. The Company Parties do not knowingly collect personally identifiable information from children under the age of sixteen. If you are under the age of sixteen, you must ask your parent or guardian for permission to use the Website and the Services.

ARTICLE 4. Consent to Personal Data Processing

§1. EU Persons Consent to Personal Data Processing

- 4.1. If you are an EU Person and to Process your Personal Data we need to receive your consent, as it is prescribed by GDPR, we will process your Personal Data only in the case we have received from you a freely given, specific, informed and unambiguous indication of your wishes by which you signify agreement to the processing of Personal your Data ("Consent").
- 4.2. You may give your Consent by ticking a box when visiting the Website. In the case you tick respective box, you irrevocably and unconditionally consent and agree that the Company Parties shall be entitled to **Process** your Personal Data as it is indicated in your Consent.
- 4.3. Your Consent covers all Processing activities with your Personal Data carried out for the same purpose or purposes. When the Processing has

第 4 条 同意个人数据处理

§1.欧盟个人同意个人数据处理

- 4.1. 如果您属于欧盟个人,则按照 GDPR 的规定,我们需要获得您的同意方可处理您的个人数据,仅当我们获得您通过签署处理您个人数据的协议而自由授予的、明确、知情和明白的愿望表达时("同意"),我们方可处理您的个人数据。
- 4.2. 您可以在访问网站时通过勾选一个 方框来授予您的同意。若您勾选相 应的方框,则您不可撤销且无条件 地同意和赞同公司各方有权处理您 的个人数据,正如在您的同意中表 明的。
- 4.3. 您的同意涵盖对于您个人数据出于相同目的而进行的所有处理活动。 当出于多个目的进行处理时,您的同意应当被认为授予所有这些目的。
- 4.4. 您有权随时撤销您的同意。您可以通过向我们发送电子邮件提交此类请求:company@osadc.io。您的撤销同意不会影响基于撤销前的同意而处理您个人数据的合法性。
- 4.5. 除非法律要求或允许(包括,为避免疑义,欧洲联盟成员国的法律),我们不会使用或披露您拒绝同意或后来撤销同意的个人数据用于任何目的。若您撤销同意,您赞同尽

- multiple purposes, your Consent should be deemed given for all of them.
- 4.4. You have the right to withdraw your Consent at any time. You can submit such request by an email to: sending us company@osadc.io. Your withdrawal of Consent shall not affect the lawfulness of your Personal Data Processing based on Consent before its withdrawal.
- 4.5. Except as required or enabled by law (including, for the avoidance of doubt, the laws of the member states of the European Union), we will not use or disclose your Personal Data for any purpose for which you refuse Consent or later withdraw your Consent. If you withdraw Consent, you agree that in spite of this withdrawal, we may continue to use those Personal Data previously provided to us to the extent that we are contractually or otherwise legally obliged to do so and to the extent necessary enforce any contractual obligation you may have towards the Company Parties or in any other way permitted by law. You also understand that although you can use the Website for some purposes without providing your Personal Data, we need certain Personal Data, including data linked to payment or involving ongoing relationship with the Company Parties or our partners. If you refuse to provide us with Personal Data we require or later withdraw your consent, we may no longer be able to provide you

§2.非欧盟个人同意个人数据处理

- 4.6. 如果您不是欧盟个人,通过经由本 网站或其他方式向我们传输您的个 人数据,即表明您不可撤销且无条 件地同意和赞同公司各方根据本政 策有权:
 - 4.6.1. 以任何方式处理,包括收集、存储、使用、披露、分享和传输(包括跨境传输)您提供给我们的个人数据,以及从您使用本网站和服务的过程中收集到的个人数据(即我们自动以及/或从其他来源收集的个人数据);以及
 - 4.6.2. 使用 Cookie 和网络信标 (像素标签)来收集您的 个人数据,并将个人数据 与您的计算机和网络浏览 器关联,以及在您登录用 户账户及访问网站和/或服 务时将数据与您的用户账 户关联。

with certain Services or access to the Website.

§2. Non-EU Persons Consent to Personal Data Processing

- 4.6. If you are not an EU Person, by transferring to us your Personal Data via the Website or otherwise, you irrevocably and unconditionally consent and agree that the Company Parties shall be entitled, in accordance with this Policy:
 - 4.6.1. To Process in any manner, including to collect, store, use, disclose, share and transfer (including cross-border), your Personal Data SO provided to us, as well as your Personal Data collected from your use of the Website and the Services (i.e. your Personal Data which we collet automatically and/or from other sources); and
 - 4.6.2. to use cookies and web beacons (pixel tags) to collect your Personal Data and associate the Personal Data with your computer and web browser, as well as, in the event you access the Website and/or the Services logged in to your User Account, with your User Account.

ARTICLE 5. Collection of Personal Data

§1. General Provisions

第 5 条 个人数据的收集

§1.总则

5.1. 我们收集的个人数据类型取决于您与 我们的互动方式以及您正在购买或使

- 5.1. The type of Personal Data we collect depends on how you are interacting with us and which Services you are purchasing or using. In many cases, you can choose whether or not to provide us with Personal Data, but if you choose not to, you may not get full functionality from the Website or its Services.
- 5.2. When you visit the Website, you may provide us with the following types of Personal Data: (i) Personal Data that you voluntarily disclose that is collected on an individual basis; (ii) Personal Data collected automatically when you use the Website and its Services; and (iii) Personal Data which we collect from sources other than the Website.
- 5.3. You may always refuse to supply your Personal Data, though this may prevent you from engaging in certain Website-related activities and/or obtaining certain Services.
- 5.4. The Website contains links to other third party websites that may collect Personal about you, including through cookies or other technologies. If you use our links to visit another websites, you will leave the Website and this Policy will not apply to your use of, and activity on those other websites. You should consult these other websites' privacy policies as we have no control them, and are responsible for any information that is submitted to or collected by these third parties.

- 用的服务种类。在许多情况下,您可以选择是否向我们提供个人数据,但如果您选择不提供,则您可能无法获得本网站或其服务的完整功能。
- 5.2. 访问本网站时,您可能向我们提供如下类型的个人数据:(I) 您自愿披露、单独收集的个人数据;(ii) 您在使用本网站及其服务时自动收集到的个人数据;以及(iii) 我们通过本网站以外的来源收集到的个人数据。
- 5.3. 您可以始终拒绝提供您的个人数据 ,尽管这可能会阻止您参与某些网 站相关的活动以及/或获取某些服 务。
- 5.4. 网站包含某些通往可能收集有关您个人数据的其他第三方网站的链接,包括通过 cookie 或其他技术。若您使用我们的链接来访问其他网站,则您将离开本网站,同时本政策将不适用于您对那些其他网站的使用和在上面的活动。您应当咨询这些其他网站的隐私政策,因为我们对此无法控制,且对提交至这些第三方或由他们收集的任何信息概不负责。

§2.您向我们提供的数据

- 5.5. 为了履行本网站的服务和功能,我 们有权要求您向公司各方提供您的 个人数据. 包括(但不限于):
 - 5.5.1. 全名或您所代表的实体名 称;
 - 5.5.2. 用户名密码:
 - 5.5.3. 电子邮件地址;
 - 5.5.4. 电话号码:
 - 5.5.5. 出生日期;
 - 5.5.6. 加密货币钱包地址;
 - 5.5.7. 邮寄地址及居住国家/地区
 - 5.5.8. 个人身份证明文件详情;

§2. Personal Data You Provide to Us

- 5.5. In order to perform the Services and the functionality of the Website, we are entitled to ask you to provide Company Parties with your Personal Data, including (but not limited):
 - 5.5.1. full name or the name of an entity you represent;
 - 5.5.2. username password;
 - 5.5.3. email address;
 - 5.5.4. phone number;
 - 5.5.5. date of birth;
 - 5.5.6. cryptocurrency wallet address;
 - 5.5.7. mailing address and country of residence;
 - 5.5.8. personal identification document details;
 - 5.5.9. payment information, such as, payment card number (credit or debit card), and the security code associated with your payment instrument, if you make a payment; and
 - 5.5.10. other Personal Data you choose to provide, such as your public LinkedIn account, your public Twitter account, your professional background, your thoughts on how you can contribute to our ecosystem.
- 5.6. Personal Data set out in Article5.5 hereof is collected only when voluntarily offered, and

- 5.5.9. 支付信息,例如支付卡号码(信用卡或借记卡)和进行支付时与您的付款工具关联的安全码;以及
- 5.5.10. 您选择提供的其他个人数据,例如您的 LinkedIn公开账户、您的 Twitter公开账户、您的职业背景、您对于自己可以如何为我们的生态系统做贡献的想法。
- 5.6. 第 5.5 条规定的个人数据仅当自愿 提供时才会收集,且仅用于本网站 上和本政策中明确确定的目的。
- 5.7. 在不损害网站使用条款规定的情况下,如果您没有向公司各方提供第5.5 条规定的个人数据,或向其提供不准确、误导性或不完整的个人数据,则公司各方有权自行决定采取以下措施且不另行通知:
 - 5.7.1. 对您使用网站和/或服务施加限制和约束;和/或
 - 5.7.2. 暂停或终止您访问网站、 您的用户账户或服务。

§3.我们自动收集的数据

- 5.8. 公司各方可以通过多种方式并在多种情形下向您收集个人数据,包括但不限于在网站注册、下单或请求(如适用)、订阅新闻简报、回复调查、填写表格、使用实时聊天功能(如适用)、就我们的产品或服务向我们提供反馈。公司各方有权将您在与本网站或服务的不同部分互动过程中收集的个人数据与其他相关可用数据进行合并。
- 5.9. 公司各方在您访问网站、与网站互 动和操作网站以及提供服务的过程 中收集或您在上述过程中向公司各 方传输的个人数据可能包括但不限 于以下个人数据:
 - 5.9.1. 设备信息,这可能包括 (但不限于)有关您用来 访问本网站的计算机或移

- solely for purposes that are clearly identified on the Website or in this Policy.
- 5.7. Without prejudice to the provisions set out in the Terms of Use for the Website, in the provide case you do not Parties with the Company Personal Data set out in Article 5.5 hereof, or provide them with inaccurate, misleading or incomplete Personal Data, Company Parties at their sole discretion shall be entitled, without any notice to you, to:
 - 5.7.1. impose limitations and restrictions on your use of the Website and/or the Services; and/or
 - 5.7.2. suspend or terminate your access to the Website, your User Account or the Services.

§3. Personal Data We Collect Automatically

5.8. Company Parties may collect the Personal Data from you in a variety of ways and circumstances, including, but not limited to, registration on the Website, placement of an order or a request applicable), subscription to a newsletter, response to survey, filling out a form, use of a live chat (if applicable), providing us with feedback on products Services. our or Company Parties shall entitled to combine Personal Data collected in the course of your interaction with different sections of the Website or the Services with other anv relevant available information.

- 动设备的信息,包括硬件型号、操作系统和版本、您使用的网络浏览器,以及其他设备识别标记;
- 5.9.2. 使用信息和浏览历史,例如有关您在网站内导航方式的信息、您的浏览历史,以及您使用最多的网站元素和服务;
- 5.9.3. 位置数据,用于具有位置增强功能的服务。如果我们需要您的同意来收集地理位置数据,我们将单独收集此数据:
- 5.9.4. 人口统计信息, 例如您的 国家/地区和首选语言;
- 5.9.5. 服务器登录信息,这可能 包括(但不限于)您的登录详情、访问的日期和时间、查看的页面、您的 IP 地址、在网站上花费的时间,以及您在本网站之前和之后所访问的网站:
- 5.9.6. 遥测信息。如果您使用我们的任何开源软件,则我们可能收集带宽上传和下载速度、您设备上的可用和已用存储空间,以及有关您设备的其他统计信息
- 5.9.7. 使用信息。若您使用本网站,则我们将收集有关您上传存储的文件的元信息,同时我们将记录您使用您的私钥来授权通信的实例;
- 5.9.8. 通过 cookie 和其他跟踪 技术收集到的信息。当您 与本网站互动时,我们和 我们的服务提供商使用包括 cookie 和网络信标在 内的各种技术来收集信息。Cookie 是您在访问 网站时存储在您设备上的 小型数据文件,它使我们

- 5.9. Personal Data collected by or transmitted to Company Parties in the course of accessing, interacting and operating of the Website and provision of the Services may include, without limitation, the following Personal Data:
 - 5.9.1. device information, which may include (but limited not information about the computer or mobile device you use to access the Website, including the hardware model, operating system and version, the web browser you use, and other device identifiers;
 - 5.9.2. usage information and browsing history, such as, information about how you navigate within the Website, your browsing history and which elements of the Website or which Services you use the most;
 - 5.9.3. location data, for Services with location-enhanced features. If we need your consent to collect geo-location data, we will collect this separately;
 - 5.9.4. demographic information, such as, your country, and preferred language;
 - 5.9.5. server log information, which may include (but is not limited to) your

- 5.10. 在网站运行及提供服务过程中收集的个人数据可能会有所不同,这取决于您在访问网站和使用服务时是否登录您的用户账户。
- 5.11. 我们可能使用 cookie 来汇总有关 网站流量和网站互动的综合数据, 以便在未来提供更好的用户体验和 工具。我们还可能使用可信第三方 服务以我们的名义来跟踪此信息。 如果您在您的浏览器中禁用 cookie . 这可能会关闭网站的某些功能。

§4.我们从其他来源收集的数据

5.12. 我们还可能从其他来源收集有关您的信息,例如当您通过使用自己的账户凭据用于单独的第三方服务来登录用户账户时。我们将从该服务获得信息,如相关第三方的授权屏幕所示。

- login details, the date and time of visits, the pages viewed, your IP address, time spent at the Website and the websites you visit just before and just after the Website;
- 5.9.6. telemetry information. If you use any of our open source software, we may collect bandwidth upload and download speeds, the amount of free and used storage space on your device and other statistics about your device;
- 5.9.7. usage information. If you use the Website, we will collect metadata about the files you upload for storage and we will record instances in which you have used your private key to authenticate communications;
- 5.9.8. information collected by cookies and other tracking technologies. We and our service providers use various technologies to collect information when you interact with the Website, including cookies and web beacons. Cookies are small data files that are stored on your device when you visit website, which enable to collect information about your device identifiers,

address, web browsers used to access the Website, pages or features viewed, time spent on pages, mobile app performance and links clicked. Web beacons are graphic images that are placed on a website or in an email that is used to monitor the behavior of the user visiting the website or sending the email. They are often used in combination with cookies.

- 5.10. Personal Data collected hereunder in the course of operation of the Website and provision of the Services may differ depending on whether you access the Website and the Services logged in to your User Account or without logging in.
- 5.11. We may use cookies to compile aggregate data about the Website traffic and the Website interactions in order to offer better user experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf. If you disable cookies in your browser it may turn off some of the features of the Website.

§4. Data We Collect from Other Sources

5.12. We also receive may information about you from other sources, such as when you log into your User Account using by your account credentials for separate third-party service. We will receive information from that service as indicated in the relevant third party's authorization screen.

ARTICLE 6. Use of Personal Data

- 6.1. We use Personal Data to provide and improve the Website and its Services and for other purposes that are in our legitimate interests, as well as for compliance purposes.
- 6.2. We will use the Personal Data for purposes of:
 - 6.2.1. providing, maintaining, delivering or improving the Website, the Services or other products or services provided through the Website;
 - 6.2.2. verifying that you are a unique individual or entity;
 - 6.2.3. conducting our white-listing process if you want to participate in a token sale organized by the Company Parties;
 - 6.2.4. analysing and tracking
 Personal Data to
 determine the
 usefulness or
 popularity of certain
 content, and to better
 understand the online
 activity of the Website
 users;
 - 6.2.5. fulfilling our legal or regulatory requirements;
 - 6.2.6. providing you with the information, products

第 6 条 个人数据的使用

- 6.1. 我们使用个人数据以便提供和改进本 网站及其服务,同时用于符合我们合 法利益的其他目的以及合规目的。
- 6.2. 我们使用个人数据的目的将包括:
 - 6.2.1. 提供、维护、交付或改进 本网站、服务或通过本网 站提供的其他产品或服务
 - 6.2.2. 验证您是一个独一无二的 个人或实体:
 - 6.2.3. 执行我们的白名单流程, 若您想参与由公司各方组 织的代币销售:
 - 6.2.4. 分析和跟踪个人数据,以 判定某些内容的有用性和 受欢迎性,以及更好地理 解网站用户的在线活动;
 - 6.2.5. 满足我们的法律或法规要求;
 - 6.2.6. 为您提供您所请求的信息、产品或服务;
 - 6.2.7. 回答您的问询或响应您的 通讯请求:
 - 6.2.8. 开发新产品或服务:
 - 6.2.9. 向您发送技术提示、支持 或管理通知;
 - 6.2.10. 就我们认为您会感兴趣的 新闻、产品、服务、活动 和其他信息与您沟通;
 - 6.2.11. 监测和分析与本网站有关 的趋势、使用情况和活动

- or services that you have requested;
- 6.2.7. answering your inquiry or responding to a communication from you;
- 6.2.8. developing new products or services;
- 6.2.9. sending you technical notices, support or administrative notifications;
- 6.2.10. communicating with you about news, products, Services, events and other information we think will be of interest to you;
- 6.2.11. monitoring and analysing trends, usage and activities in connection with the Website;
- 6.2.12. detecting, investigating and preventing fraudulent transactions or unauthorized or illegal activities;
- 6.2.13. protecting the rights and property of the Company Parties and others;
- 6.2.14. linking, connecting or combining information we collect from or about you with other information; and
- 6.2.15. carrying out any other purpose or reason for which Personal Data was collected.

- 6.2.12. 检测、调查和防范欺诈性 交易或未经授权或非法的 活动;
- 6.2.13. 保护公司各方和他人的权 利和财产;
- 6.2.14. 将我们从您那里收集或关于您的信息与其他信息进行关联、连接或整合;以及
- 6.2.15. 出于其他任何目的或原因 收集个人数据。

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ARTICLE 7. Disclosure of Personal Data

- 7.1. The Company Parties treat Personal Data as confidential and may not pass on or use any such data without valid legal grounds.
- 7.2. We will only disclose your Personal Data in the following ways:
 - 7.2.1. with your Consent or at your instruction;
 - 7.2.2. with our current or future Company Parties and with other companies under common control or ownership with us or our offices internationally;
 - 7.2.3. with third parties or service providers that perform work for us;
 - 7.2.4. certain information you may choose to share may be displayed publicly, such as your username and any content you post when you use interactive areas of the Website like our online forums;
 - 7.2.5. in connection with a merger or sale of our company assets, or if we do a financing or are involved in an acquisition, or any other situation where Personal Data may be disclosed or transferred as one of our business assets;

第7条个人数据的披露

- 7.1. 公司各方将个人数据视为机密,并不 会在没有有效法律依据的情况下传递 或使用该等数据。
- 7.2. 我们只会以如下方式披露您的个人数据:
 - 7.2.1. 征得您的同意或按照您的 指示;
 - 7.2.2. 披露给我们当前或未来的公司各方,以及受我们或我们的国际办事处共同控制或归我们所有的其他公司;
 - 7.2.3. 披露给为我们执行工作的 第三方或服务提供商;
 - 7.2.4. 您可能选择分享的某些信息可能会公开显示,例如您的用户名和您在使用本网站互动区域(例如我们的在线论坛)时发表的任何内容:
 - 7.2.5. 涉及到兼并或出售我们公司资产,或者当我们进行融资或牵涉收购时,或者个人数据可能作为我们的一项商业资产而被披露或移交的其他任何情况;
 - 7.2.6. 回应信息请求(如果我们 认为信息披露符合任何适 用法律法规或经法律程序 要求);
 - 7.2.7. 如果我们认为您的操作违 反了用户协议、政策或法 律,或者为保障公司各方 或第三方的权利、财产和 任何资产的安全:
 - 7.2.8. 当披露汇总个人数据、按 理无法用来识别您时披露 给第三方。

- 7.2.6. in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- 7.2.7. if we believe your actions are inconsistent with our user agreements, policies or legislation, or to protect the rights, property and safety of assets any of the Company Parties or third parties;
- 7.2.8. with third parties where aggregate Personal Data is disclosed which cannot be reasonably be used to identify you.
- 7.3. Company Parties may without limitations share aggregated or de-identified information, which cannot reasonably be used to identify you.

7.3. 公司各方可以不受限制地分享按理 不能识别您身份的汇总信息或去除 了身份信息的信息。

ARTICLE 8. Transmission of Personal Data

- 8.1. The transmission of Personal Data or any other information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Company Parties are not liable for the security of any Personal Data or any other information you are transmitting over the Internet, or third-party content.
- 8.2. Any transactions on the blockchain network are public and Company Parties can not

第8条个人数据的传输

- 8.1. 在互联网上或其他可公开访问的网络 上进行的个人数据或其他任何信息 (包括电子邮件通信)的传输并非百 分之百安全。对于您在互联网上传输 的任何个人数据或任何其他信息或第 三方内容的安全性,公司各方概不负 责。
- 8.2. 区块链网络上的任何交易都是公开的,公司各方不能从区块链中排除交易数据。
- 8.3. 对欧盟个人的个人数据向内部和外部接收者的传输需获得授权并用于确定的目的。传输至欧洲经济区以外接收者的欧盟个人的个人数据必须受到至少与 GDPR 同等级别的保

exclude transaction data from the blockchain.

8.3. Transmission of Personal Data of EU Persons to recipients, both internally or externally, is subject to the authorisation requirements and pursuant to defined purposes. Personal Data of EU Persons transmitted to a recipient outside the European Economic Area must be subject to protection at least equivalent to that sought by the GDPR. Intragroup transfers of Personal Data of EU Persons to third countries are subject to the safeguards provided by the by-laws of the Company Parties.

护。对欧盟个人的个人数据向第三 国的群体内部传输受到公司各方章 程提供的安全保护。

ARTICLE 9. Protection of Personal Data. Security Measures

- 9.1. We take appropriate security, administrative and technical measures to protect any Personal Data you provide regarding the collection, storage and Processing of Personal Data, as well as security measures to protect your User Account against unauthorized access, modification, disclosure or destruction of your Personal Data.
- 9.2. Personal Data is safeguarded from unauthorised access and unlawful Processing disclosure, as well as accidental loss, modification or destruction. through state-of-the-art technical and organisational measures. These adjusted and updated continuously in tandem with technical developments and organizational changes. Additionally, Personal Data

第 9 条 个人数据的保护安全措施

- 9.1. 我们会采取适当的安全、管理和技术 措施,以便在收集、存储和处理您提 供的个人信息时对其加以保护,以及 采取安全措施,防止未经授权使用、 修改、披露或销毁您用户账户中的个 人信息。
- 9.2. 个人数据受到安全保护,免遭未经 授权的访问和非法处理或披露、意 外损失、以及通过前沿技术或有组 织的措施造成的修改或销毁。这些 会随着技术发展和组织变化进行持 续调整和更新。此外,个人数据保 护审计和其他控制会定期执行。
- 9.3. 我们采取合理措施,以保护通过网络进行通信的个人数据的安全系统而,没有任何计算机安全系统而,没有任何计算机安全系元一失的,同时互联网对互联网对方法。因此,对自息传输方法。或接受的任何责任,或对该信息的假不承担任何责任,同时,我们无法们自身的。对于有任何盗用、拦截、修改、删

- protection audits and other controls are carried out on a regular basis.
- 9.3. We take reasonable steps to protect the security of the Personal Data communicated through the Website. However, no computer security system is entirely fool proof and the Internet is not a secure method of transmitting information. As a result, we do not assume any responsibility for the Personal Data you submit to or receive from us through the Internet, or for any unauthorized access or use of that information, and cannot and do not we that information quarantee communicated by you to us or sent to you by us will be received, or that it will not be altered before or after its transmission to us. You agree to not hold any Company Party liable for any loss or damage of any sort incurred as a result of any misappropriation, interception, modification, deletion, destruction or use of information provided through the Website.
- 9.4. Most web browsers are set to accept cookies as a default. You may wish to opt out by turning off cookies (please refer to the help menu on your browser); however, switching off cookies may restrict your use of the Website. You may also opt out of receiving promotional communications from us at any time bν following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as technical notices, support

- 除、销毁或使用通过本网站提供的 信息所造成的任何类型的损失或损 害, 您同意不追究公司方的责任。
- 9.4. 大多数网络浏览器默认设置为接受 cookie。您可能希望通过关闭 cookie 选择取消(请参考您浏览器 上的帮助菜单);然而,关闭 cookie 可能限制您对网站的使用。 您还可以通过按照推广性通信中的 说明选择取消接收这些推广通讯。 若您选择取消,我们可能仍然会向 您发送非推广性通讯,例如有关您 用户账户(如有)的技术提示、支持或管理通知或信息。
- 9.5. 提供给我们的个人数据是按照相应 公司方所在司法管辖区的适用法律 存储的。个人数据的存储时长取决 于相应公司方所在司法管辖区的适 用法律。公司各方已确保就个人数 据的安全保障、机密性和安全性实 施适当的安全标准。

- administrative notifications or information about your User Account (if you have one).
- 9.5. Personal Data provided to us is stored in accordance with applicable laws of the jurisdiction of the respective Company Party. The period for which the Personal Data will be stored is determined by the applicable laws of jurisdiction of the respective Company Party. The Company Parties have ensured appropriate security standards are in place regarding the safeguarding, confidentiality and security of Personal Data.

ARTICLE 10. Retainment of Information

- 10.1. In accordance with applicable laws and as needed to provide the Services to our users, Company Parties may hold your Personal Data. This requirement is conditioned by a need to comply with legal obligations and resolve possible disputes.
- 10.2. Company Parties may retain your Personal Data so long as your User Account is active. Moreover, your Personal Data may be held beyond the abovementioned period until it is indispensable for Company Parties to have relevant information to respond to any issues that may arise later.

第 10 条 信息保留

- 10.1. 根据适用法律以及为我们的用户提供服务的需要,公司各方可能保留您的个人数据。此要求的条件是需要遵从法律义务和解决困难的争议。
- 10.2. 只要您的用户账户处于活动状态, 公司各方就可能保留您的个人数 据。另外,您的个人数据保留期限 可能超出上述期限,直至公司各方 必须掌握相关信息以回应后续可能 出现的任何问题。

ARTICLE 11. EU Persons' Rights

11.1. The Company Parties value protection of all Website and Services users' rights relating to their Personal Data, hence, the Company Parties are committed to making sure you

第 11 条 欧盟个人的权利

11.1. 公司各方重视保护所有网站和服务用户与其个人数据相关的权利,因此,公司各方致力于确保您可以有效和免费地行使您的相应权利。公司将确保

- can exercise your respective rights effectively and free of charge. The Company will ensure each your request related to your Personal Data be reviewed in a timely fashion.
- 11.2. EU Persons shall acknowledge, that their rights relating to Personal Data are provided in the GDPR and other applicable laws of the member states of the European Union. In particular, EU Persons have the following rights relating to their Personal Data:
 - 11.2.1. **right to access**. You can request access to you Personal Data and obtain a copy of such Personal Data in a format acceptable to you (e.g. PDF, DOC, DOCX, etc.). You can submit such request by sending an email to company@osadc.io.

After your request is received, our privacy team reviews the form conducts and requestor's identity verification without undue delay. Upon successful verification, you are provided with a copy of your Personal Data;

11.2.2. right to data portability. You have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those

- 您的每一次与您个人数据相关的请求 获得及时审查。
- 11.2. 欧盟个人将承认, GDPR 和欧盟成员国的其他适用法律中向他们提供与个人数据相关的权利。特别地,欧盟个人拥有与其个人数据相关的如下权利:
 - 11.2.1. 访问的权利。您可以请求 访问您的个人数据,并以 您可以接受的格式(例 PDF、DOC、DOCX等) 获得此类个人数据的别 本。您可以通过或此类请求 :Company@osadc.io 。收到您的请求后,我就 的隐私团队会审核格不 验证请求。一经成功 的配提供您个人数据
 - 11.2.2. **数据迁移的权利。**您有权以结构化、常用和机器可读的格式收取您提供给我们的个人数据,并有权将这些数据传送给其他服务提供商(控制者),而不受我们的妨碍:
 - 11.2.3. 擦除的权利 ("被遗忘的权利") 和纠正的权利。您有权通过向我们发送相应请求至

data to another service provider (controller) without hindrance from us;

- 11.2.3. right to erasure ("Right to be forgotten") and right to rectification. You are entitled to request erasure or rectification of your Personal Data sending by respective request to company@osadc.io. We will handle requests for Personal Data to be rectified or deleted, unless there is a legal requirement prohibits such request to be fulfilled. When request is fulfilled, you will be informed that your Personal Data is changed or erased and is not-longer collected, however, to fulfil our legal requirements the Company Parties will store information about each requestor for the purposes of providing an evidence that a been request has fulfilled;
- 11.2.4. right to object. At all times, you are entitled to object to Processing of your Personal Data. Right to object can be exercised by sending email an company@osadc.io. Upon receipt of the request, the Company **Parties** cease the Processing, unless

there is a legal or

- 11.2.5. 知情权利。如果您正在询问有关对您个人数据进行的处理活动,公司各方将提供有关如下信息,不得无故拖延:(i) 处理的目的;(ii) 个人数据的种类和类型;(iii) 保留期限;(iv) 相关个人数据的来源;(v) 隐私权和关于数据可迁移性的信息。然而,本政策提供所有关于个人数据种类和由公司各方进行的处理操作的信息;以及
- 11.2.6. 向监管当局提起投诉的权利。监管当局指的是由欧盟成员国依照 GDPR 第51 条的规定设立的独立公共机构。

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statutory ground for such Processing;

If you are inquiring

11.2.5. right to be informed.

about Processing activities conducted with respect to your Personal Data, the Company Parties, without undue delay, will provide information about: (i) purposes of Processing; (ii) categories and types of Personal Data; (iii) retention period; (iv) source of the relevant Personal Data; (v) rights privacy and information Data on portability. However, all information about the categories of Personal Data and Processing operational conducted by Company Parties is available in this Policy; and

11.2.6. the right to lodge a complaint with supervisory authority. Supervisory authority means an independent public authority which is established by an EU member state pursuant to Article 51 GDPR.

ARTICLE 12. Alterations to Policy

12.1. We have the right, at our discretion, to update this Policy at any time. We recommend that you frequently check this Policy to find any changes and stay informed about how we help protect the Personal Data.

第 12 条 政策的更改

- 12.5. 我们有权自行决定随时更新本政策。我们建议您经常查阅本政策,以寻找任何变动,并随时留意我们如何帮助保护个人数据。
- 12.6. 使用本网站即表示您承认并同意您 有责任定期查看本政策,并了解相 关修改内容。

- 12.2. By using the Website, you acknowledge and agree that it is your responsibility to periodically review this Policy and be aware of the changes.
- 12.3. The subsequent use of the Website or the Services after changes to this Policy will also be considered as your acceptance of these changes.
- 12.4. This Policy may from time to time be translated into other languages. To the extent that any discrepancy may exist between the English version of this Policy and its version in another language, the English version prevails.

- 12.7. 您在本政策修改后使用本网站或服 务也将被视为您接受修改内容。
- 12.8. 本政策可能会不时翻译成其他语言。如果译本与本政策英文版之间存在任何差异,则以英文版为准。

ARTICLE 13. Data Protection Officer

- 13.1. The Company may appoint an expert on data privacy who works independently to ensure that the Company is adhering to the policies and procedures set forth in the GDPR (data protection officer). Data protection officer assists the Company to monitor internal compliance, inform and advise on data protection obligations, provide advice regarding data protection impact assessments (DPIAs) and act as a contact point for data subjects and the supervisory authorities.
- 13.2. In the case the Company appoints such data protection officer, it will publish its contact details on the Website.

第 13 条 数据保护官

- 13.1. 公司可能委任一名数据隐私专家独立工作,以确保公司遵守 GDPR 中规定的政策和流程(数据保护官)。数据保护官协助公司监测内部合规,就数据保护义务提供信息和建议,就数据保护影响评估提供建议,并充当数据主体和监管当局之间的联系点。
- 13.2. 若公司委任此类数据保护官,则公司将在本网站上公布其详细联系方式。

ARTICLE 14. Feedback

14.1. We welcome your questions and suggestions with respect to the implementation or amendment of this Policy. Please use this feedback for

第 14 条 反馈意见

14.2. 我们欢迎您就本政策的实施和修订 提出问题和建议。请使用此反馈与 我们通信: company@osadc.io。

communicating	with	us:
company@osadc.io.		

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