

PRIVACY POLICY

Last updated 31. 12. 2023

HAZEL LABS d.o.o. (hereinafter: "HAZEL LABS d.o.o.", "Qvrse", the "Company", "we", "our", "us") is a company registered in Ukmarjeva 2, Ljubljana, Slovenia, that manages the Qvrse Website and the Platform and all the services provided therein ("Services"). We are registered in the court register of Slovenia, registration number 9041265000.

HAZEL LABS d.o.o. is the data controller of your data processed for purposes set forth herein and, unless expressly specified otherwise, is responsible for the collection, use, disclosure, retention, and protection of your Data by our privacy standards, this Privacy Policy, and applicable laws.

This privacy notice describes how and why we might collect, store, use, and/or share ("process") your information when you use our services.

Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services when you participate in activities on the Services, or otherwise when you contact us.

Sensitive Information. We do not process sensitive information.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services and for our internal analytics and reporting purposes.

2. HOW DO WE PROCESS YOUR INFORMATION?

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and comply with the law. We may also process your information for other purposes with your consent. We process your personal information for a variety of reasons, depending on how you interact with our Services.

3. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or are under common control.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

5. LINKS TO OTHER WEBSITES AND SOCIAL LOGINS

If you choose to register or log in to our Services using a social media account, we may have access to certain information about you.

Our Services allow you to register and log in using your third-party social media account details like your Facebook or Twitter logins. Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes described in this privacy notice or otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

Our Services may contain certain hyperlinks to websites/apps that are not run by us. These include Instagram, Twitter, Discord, Facebook, TikTok, LinkedIn, Snapchat, Discord, etc. We are not responsible for personal information about you that is collected and stored by these platforms and similar third parties. They have their Privacy Policies so please note that this Privacy Policy does not apply to them. For that reason, we recommend you read their Privacy Policies carefully before submitting personal information to them.

6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

We may transfer, store, and process your information in countries other than your own.

Our servers are located in Slovenia. If you are accessing our Services from outside, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information.

7. HOW LONG DO WE KEEP YOUR INFORMATION?

We keep your information for as long as necessary to fulfil the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records.

9. HOW DO WE PROTECT YOUR INFORMATION?

9.1 General information

Your data is processed in a way that ensures the appropriate security. This includes protection against unauthorized or unlawful processing and accidental loss, destruction or damage.

We try to do our best to protect your personal information. Unfortunately, passing on information via the internet is never completely secure, which is why, despite our best efforts, we cannot guarantee the security of your personal information.

9.2 Your responsibility

Please note that you are responsible for protecting your credentials connected with your account on our Services. You are also fully responsible for any use of your account under your user name.

9.3 Protection of personal data under EU legislation

If you are located in the European Union, the following safety measures are also provided for securing your personal information.

9.4 Security measures: Appropriate technical and organizational measures are implemented to ensure that, by default, the only personal data processed are those, which are necessary for each specific purpose of processing. This applies to the quantity, the extent of the processing, the period of storage, and the accessibility of the collected personal data. With such measures, we try to ensure that personal data are not made accessible to an indefinite number of persons without your intervention.

9.5 In case of a personal breach: If a personal data breach occurs we shall without undue delay, where feasible, not later than 72 hours after having become aware of it, notify the supervisory authority. This does not apply when the personal data breach is unlikely to result in a risk to your rights and freedoms. In case of a risk to your rights and freedoms due to a personal data breach, we shall also inform you without undue delay. This does not apply to situations where we have implemented appropriate technical and organizational protection measures that were applied to the personal data affected by the breach or if our subsequent measures ensure that the risk is no longer likely to materialize. It also does not apply when it would involve a disproportionate effort. In the described cases we shall inform you through public communication or a similar way in an equally effective manner.

10. WHAT ARE YOUR RIGHTS?

As our User, you have certain rights regarding the processing of your personal information. The extent of these rights depends on where you are located. If you reside in the European Union, please refer to section 6.1., on the other hand, if you reside outside the EU refer to section 6.2. For any further questions regarding your rights, please feel free to contact us at any time via the email disclosed below.

10.01 Rights of individuals residing within the European Union

If you are located within the EU, you have the following rights, guaranteed by the European General Data Protection Regulation (GDPR):

Right to be informed - you have the right to concise, transparent, intelligible, and easily accessible information regarding the processing of your personal data.

Right of access - you have the right to access the personal data we have about you. You can ask us for confirmation as to whether your personal information is being used and in what way we use it (e.g. the purposes of the processing, the recipients). A copy of your personal information shall also be provided to you at your request.

Right to rectification (updating your information) - on your request, we shall, without undue delay, ensure that inaccurate personal data is updated. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed.

Right to erasure (deleting your information) - when certain specific criteria are met (Article 17 GDPR), you have the right to ask us to delete any personal data we hold about you without undue delay.

Right to restriction of processing - under certain circumstances (Article 18 GDPR), you can request that we restrict how we process your personal information.

Right to data portability - you have the right to receive the personal data we hold about you in a structured, commonly used, machine-readable format. You may also transfer this data to a third-party provider of services. Note that this right only applies when we use your information based on your consent or performance of a contract and our use of your information is carried out by automated means.

Right to object - you have the right to object at any time to our processing of your personal data if you have a valid reason. Unless there are compelling legitimate grounds for further processing, we shall stop processing your personal data. This right also enables you to require from us that we stop using your personal information for direct marketing purposes.

Complaints - you may make a complaint to the relevant data protection regulator under the conditions of GDPR.

Since your privacy is very important to us, our employees receive additional training regarding GDPR-related matters. Therefore, if you have any questions regarding your rights or the circumstances in which these rights are applicable, please contact us. You can also read more detailed descriptions of each right in Chapter III of the GDPR (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=SL>).

Legal bases for processing information of EU residents - if you are an EU resident, we will only process your personal information when one (or more) of the following requirements is met:

- When we have your consent to do so. If consent is the legal basis for the processing of your personal data, you may withdraw your consent at any time.
- When processing is necessary for the performance of the contract to which you are a party to (e.g. for providing the services you requested).
- To comply with our legal obligations.
- When it is necessary to protect your vital interests or those of other individuals.
- When processing is necessary for the performance of a task carried out in the public interest.
- When we (or a third party) have a legitimate interest in processing your personal data.

10.2 Rights of the individuals residing outside the European Union

If you are a non-EU User of our Services your personal data may be processed for the purposes described in this Privacy Policy in accordance with the rights described above. However, we reserve the right to process your information by the standards of your country's legislation, which may guarantee a lower standard of rights than the GDPR.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can contact us at info@qvrse.io.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any

investigations, enforce our legal terms and/or comply with applicable legal requirements.

11. DO WE MAKE UPDATES TO THIS POLICY?

Yes, we will update this notice as necessary to stay compliant with relevant laws. We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

12. HOW CAN YOU CONTACT US

If you have questions or comments about this notice, you may contact us by post at HAZEL LABS d.o.o., Ukmarjeva 2, Ljubljana, Slovenia, or via email at info@qvrse.io.