

# PRIVACY POLICY

Effective Date: March 1, 2022

This Privacy Policy applies to SoonLabs NFTs Inc., and any affiliates or subsidiaries (collectively, “**SoonLabs**”, “**we**”, “**our**” or “**us**”), and applies to all the Non-fungible tokens (each, an “**NFT**”) made available to you by SoonLabs, any applications controlled by SoonLabs associated with SoonLabs NFTs, SoonLabs websites, including soonaverse.com (the “**Website**”) and any other product or service to which we choose to apply this Privacy Policy (collectively the “**Service**”), and details how we collect, use, and disclose your data.

## 1. HOW WE OBTAIN PERSONAL DATA

Through the Service, we collect and process personal data, which is information about you or that identifies you, as well as anonymous data, which does not identify you. If you have any questions or concerns about our disclosure of personal data, please contact us at your earliest convenience using the contact information found below.

Subject to legal, contractual and technical requirements, you may choose not to provide SoonLabs with certain data or request the deletion of certain data, which may impact the quality of the Service provided.

## 2. PERSONAL DATA WE COLLECT

The following is a description of the personal data that we may collect, use and process in connection with the Service:

- your name, crypto wallet address and email address if you sign up for access to an account (each, an “**Account**”) or purchase an NFT through the Service; and
- your mailing address if you choose to provide it in order to mail you prizes if you win any giveaways run by SoonLabs;
- verification information required to be collected as part of our legal compliance (this information may include: your name, email address, other contact information, telephone number, usernames, government issued id, date of birth and other information collected at the time of an Account registration or a purchase of an NFT through the Service);
- information about your computer, phone, web-connected devices or other devices used to connect with the Service including but not limited to, operating system information, geo-location information, operations performed on the device and unique identifiers that may identify you over time and across different websites including your IP address or other device identifiers.

We also collect anonymous data that does not identify you, including but not limited to responses to anonymous feedback requests, metrics and other types of statistical data, which can be derived from use of the Service.

### **3. PROCESSING OF YOUR PERSONAL DATA**

We process your personal data primarily for our business purposes. These uses include but are not limited to:

- providing the Service to you, analyzing functionality and technical issues, tracking use of the Service and generating reports and data models;
- supporting the security and integrity of the Service including controlling access to the Service, detecting and protecting SoonLabs and third-parties against privacy breaches, error, fraud, theft, suspicious activity, violations of any service agreement you have entered into with SoonLabs and other illegal activity or for contractual, legal, regulatory or audit obligations; and
- contacting you for various reasons including feedback requests or marketing purposes, if you previously consented to such contact, analyzing functionality and technical issues, tracking use of the Service and generating reports and data models that we use to improve the service.

We may disclose your personal data to our parent companies, affiliates, subsidiaries, employees and contractors for the same purposes described above. We may also disclose your personal data to third parties, who may be located in a foreign jurisdiction and subject to foreign laws, although we do not currently share your personal data with third parties. The situations in the future where we may disclose your personal data to third parties include, but are not limited to:

- processing your data as described above;
- providing customer support and feedback, analyzing functionality and technical issues, tracking use of the Service and generating reports and data models that we use to improve the service;
- responding to requests from law enforcement or a government agency asserting lawful authority to obtain the data or where SoonLabs has reasonable grounds to believe the data could be useful in the investigation of unlawful activity, to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of data, to comply with court rules regarding the production of records and data, or to our legal counsel; and
- defending SoonLabs in a legal, regulatory or administrative proceeding or in a contractual dispute.

### **4. THIRD-PARTY SERVICES**

This Privacy Policy only applies to personal data that SoonLabs collects, processes and discloses and does not apply to the collection, processing and disclosure of data by third parties through

third-party services, which may be broader than set forth in this Privacy Policy, and that may be embedded into the Service. While we do not directly share your personal data with third parties, in many cases, third-parties may collect personal data about your online activities over time and across different websites and services. We currently use Discord, Twitter and Twitch. We strongly recommend that you read all third-party privacy policies carefully before using them. Please contact us directly using the information found below if you would like to learn more about our third-party data practices.

## **5. COOKIES AND TRACKING TECHNOLOGIES**

The Service may use tracking technologies, such as cookies, web beacons, JavaScript tags and clear GIFs to collect data about you, such as your IP address and device information. Based on this data, third-parties may be able to resolve your identity across multiple devices. This data is collected, used and disclosed in accordance with the terms of this Privacy Policy and the applicable third-party privacy policies. Certain Service features may rely on tracking technologies and by declining to accept cookies, disabling JavaScript or by changing certain settings on your device, you may not have access to these features (which may include a loss of access to any forums provided on the Service).

## **6. OBTAINING, RECTIFYING AND CONTROLLING YOUR PERSONAL DATA**

You may contact SoonLabs to obtain a copy of any personal data we collect about you, the production of which may be subject to a fee as permitted by applicable law. In addition, you may contact SoonLabs to correct inaccurate personal data or to complete incomplete personal data.

You may be able to opt-out of some or all of the ways in which your personal data is processed, or request the deletion of certain personal data, except where the personal data is necessary or vital for:

- performance of contractual or legal obligations, such as due to a service agreement you have entered into with SoonLabs;
- protecting your interests or those of another person; and
- our legitimate interests or the legitimate interests of a third-party,

and may request deletion by contacting us using the contact information found below.

## **7. DATA STORAGE AND RETENTION**

While most of the personal data we collect is stored securely within the United States, the data you provide to us through the Service may be stored and processed by third parties in countries around the world. You authorize SoonLabs and third parties acting on our behalf to process your data in any country of their choosing, which may cause your data, including personal data, to be

subject to privacy protections and legal rights that may not be equivalent to those in your country.

Your personal data is retained for the shorter of: (a) until you request its deletion; (b) until SoonLabs no longer requires such data for the purpose for which it was collected; (c) 90 days for server logs which contain IP addresses; or (d) 5 years for forums posts (such as Discord) linked to IP addresses by registered users on forums provided through the Service.

## **8. DO NOT TRACK DISCLOSURE**

Do Not Track (“DNT”) is a web or device setting that allows users to request that receivers of personal data stop their tracking activities. When you choose to turn on the DNT setting in your browser or device or use alternative consumer choice mechanisms, your browser or device sends a special signal to websites, analytics companies, advertising networks, plug-in providers and other web services you encounter to stop tracking your activity. Currently, there are no DNT technology standards, and it is possible that there may never be any DNT technology standards. As a result, we do not respond to DNT requests.

## **9. CHILDREN**

SoonLabs does not collect any personal information on individuals under the age of consent in any jurisdiction. If we learn that we inadvertently collected personal data from a child under the age of consent beyond allowable legal exceptions, we will delete that data as quickly as possible. If you are a parent or guardian of a child under the age of majority or age of consent in your jurisdiction, who you believe provided SoonLabs with personal data without your consent, please contact us at [support@soonlabs.net](mailto:support@soonlabs.net).

## **10. EUROPEAN USERS AND RIGHTS OF EUROPEAN ECONOMIC AREA RESIDENTS**

When we collect your email and any other account information such as your name and when you desire to access forums provided on the Service, the processing of your personal data is necessary for our provision of the Services to you, as described in Article 6(1)(b) of the European Union’s General Data Protection Regulation (the “GDPR”). In other cases, such as when you provide consent to contact you using your contact information (including when you provide your mailing address to receive a prize), SoonLabs may collect such personal data pursuant to Article 6(1)(a) of the GDPR. Furthermore, when required by law to collect verification information, SoonLabs collects such information pursuant to Article 6(1)(c) of the GDPR. For all other personal data collected as mentioned in this Privacy Policy, such as the collection of certain device information and IP addresses, SoonLabs has a legitimate interest, as described in Article 6(1)(f) of the GDPR, in collecting such personal data for the purposes described in this Privacy Policy.

If the GDPR or similar laws such as the UK GDPR apply to you, you have certain rights regarding your personal data. These rights include:

- **A Right of Access.** You have the right to access your personal data that we hold about you free of charge in most circumstances.
- **A Right to Rectification.** If your personal data is inaccurate or incomplete, you can change the information you provided by contacting SoonLabs using the e-mail listed below.
- **A Right to Erasure.** You have the right to obtain deletion of your personal data under most circumstances. In most cases, you may simply request the deletion by using the contact information found below. Please be careful as deletion of data in this manner is permanent and the data cannot be recovered.
- **A Right to Object.** If the processing of your personal data is based on legitimate interests according to Article 6(1)(f) of the GDPR or if your personal data was collected based on your consent according to Article 6(1)(a) of the GDPR, you have the right to object to this processing. If you object, we will no longer process your personal data unless there are compelling and prevailing legitimate grounds for the processing as described in Article 21 of the GDPR; in particular, if the personal data is necessary for the establishment, exercise or defense of legal claims or if personal data is required for the provision of the Service and you still wish to use the Service.
- **A Right to file a Complaint.** You have the right to file a complaint with the appropriate supervisory authority in your jurisdiction.
- **A Right to Restriction of Processing of your Personal Data.** You have the right to obtain restrictions on the processing of your personal data as described in Article 18 of the GDPR.
- **A Right to Personal Data Portability.** You have the right to receive your personal data in a structured, commonly used and machine-readable format and have the right to transmit such data to another controller under the conditions described in Article 20 of the GDPR.
- **A Right to Post-Mortem Control of Your Personal Data.** Certain jurisdictions grant post-mortem controls of your personal data and if such rights are applicable in your jurisdiction, you may have the right to establish guidelines for the preservation, the deletion and the transmission of your personal data after your death through a will or through your estate.
- **A Right to Opt-out of Marketing Communications.** You have the right to opt-out of marketing communications we send you at any time. If you receive any marketing e-mails from us, you can exercise your right to stop such communications by clicking on the “unsubscribe” or “opt-out” link on any marketing e-mails SoonLabs sends you. To opt-out of other forms of marketing, please contact us using the contact details provided below.

## **11. CHANGE OF OWNERSHIP OR BUSINESS TRANSITION**

In the event of, or in preparation for, a change of ownership or control of SoonLabs or a business transition such as the sale of some or all SoonLabs’s assets, we may disclose and/or transfer your

personal data to third-parties who will have the right to continue to collect and use such data in the manner set forth in this Privacy Policy.

## **12. SECURITY**

We are committed to ensuring that your data is secure. To prevent unauthorized access, disclosure, or breach, we have put in place suitable physical, electronic, and administrative procedures to safeguard and secure the data we collect and process.

## **13. CONTACT PREFERENCES**

We communicate with you primarily through the Service itself, but we may sometimes collect your email address in order to respond to support requests or comments. If you have provided us with your email address and would like to change the email preferences, we associate with you (for example, unsubscribing from receiving certain types of email) you may do so by clicking a link within certain types of emails that we send to you or, if no link is available, by replying with “unsubscribe” in the email title or body or by modifying your email settings within the Service. On rare occasions, some types of email are necessary for the Service and cannot be unsubscribed from if you continue to use the Service.

## **14. UPDATES**

SoonLabs reserves the right, in its sole discretion, to modify the Privacy Policy at any time (each an “**Update**”) and shall make each Update available on the Website. You are deemed to accept an Update by continuing to use the Service. Unless SoonLabs states otherwise, an Update is automatically effective 30 days after posting on the Website.

## **15. CONTACT US**

If you have requests, questions or comments about the Privacy Policy or our data collection in general, please contact our Data Privacy Officer at the Website or at:

**Data Privacy Officer**

support@soonlabs.net.