

P R I V A C Y P O L I C Y

BLACKDRAGON.IO & APP.BLACKDRAGON.IO & RESEARCH.BLACKDRAGON.IO

BD Innovation Hub d.o.o., headquartered in Zagreb, Ulica Lavoslava Ružičke 50, OIB/PIN: 27097985467 (hereinafter: the Company), is determined and committed to the protection of your privacy and personal data when processing them. This Privacy Policy explains the way we collect and use your personal data for the purpose of meeting our legal obligations, establishing and exercising contractual rights and obligations, and your rights and opportunities in this respect.

1/ RESPONSIBILITY FOR THE SECURITY OF COLLECTED PERSONAL DATA

The Company is responsible for the security of the collected personal data.

Your data will be processed by the Company as the controller, and Company Director as a person authorized for GDPR based on the Decision on appointment of the person responsible for GDPR from 25.03.2021. In order to protect your personal data, to process personal data and exercise your rights as a subject whose personal data is processed, personal data may be disclosed to individuals and legal entities with whom we cooperate on the basis of our contractual or legal obligations (e.g. tax consultants, accounting services, law offices, competent public authorities).

2/ WHICH PERSONAL DATA DO WE PROCESS

In general, the Company does not collect any personal data as the access to the websites blackdragon.io and research.blackdragon.io (hereinafter: the Websites) and the platform which the Company maintains for its operations (hereinafter: the Platform) is achieved by means of connecting your blockchain digital wallet's address (which is in turn pseudonymous). We will not ask you to give us your e-mail address or to create an account with us. However, some functionalities and further development may result in collection of personal data including:

- contact information and contact information such as name and surname, residence address, residence, personal identification number, occupation-business function, postal address, business address, fixed telephone number, fax number, mobile phone number, e-mail (e- mail);
- Data relating to the issuance of invoices and processing of payments and legal obligations relating to the prevention of money laundering and terrorist financing such as bank account numbers, payment card data and other relevant information;
- further business information that is necessary for the purpose of obtaining a contractual relationship or voluntarily delivered to us, such as given instructions, specific requirements and / or orders;
- already published information that we collect through publicly available registers and records;
- details of mutual communication (written correspondence, etc.) as well as conversations conducted to the extent necessary to realize the rights and obligations of the contractual relationship.

3/ HOW WE COLLECT PERSONAL DATA

If your personal data does get collected and processed it may, depending on the circumstances, occur:

- when and where the collection of personal data is necessary for the purpose of establishing a contractual relationship and exercising the rights and obligations thereof;
- when you contact us directly or through electronic communications and /or our employees with a view to establish a business relationship or express an interest in the business relationship;
- when our employees contact you or a legal entity in which you are a shareholder, a business owner, a holder of direct or indirect economic interest, or you have an appropriate function including a business relationship with a view to establish a business relationship or express an interest in doing business;
- for the purpose of distributing promotional material and advertising our products and services;
- in certain circumstances, we collect and process your personal data through third parties. For example, we may collect data from a legal person with whom you are affiliated, other legal entities with which your legal entity is affiliated, other publicly available registers and records.

Please understand that we do not have access to your blockchain digital wallet and if the wallet you are using is a non-custodial crypto wallet, nor does the developer which means no funds can be retrieved by us or any third party in the case of loss of funds or in the event that an unintended transaction occurs.

4/ ARE YOU OBLIGATED TO GIVE US PERSONAL DATA

In principle, you provide us with all your personal data voluntarily but there are no negative or damaging consequences if you decide not to give us your personal data. However, there may be a chance that this will result with the circumstances that will prevent the Company in undertaking business activities, including legal transactions, without your personal data, such as when personal data is necessary to process your orders, instructions, requests and requests for the purpose of establishing a mandatory legal relationship. In all these cases, the collection and processing of your personal data is a prerequisite for providing our services unless there is any other legal basis for their collection such as legal or contractual basis.

5/ PURPOSES IN WHICH WE PROCESS PERSONAL DATA

We process personal data exclusively for the following purposes (hereinafter: Permitted Purposes):

- for the purpose of establishing and realizing the rights and fulfillment of the obligations arising from the employment relationship;
- for the purpose of exercising the rights of workers prescribed by special laws;
- for the purpose of exercising the Company's right as an employer in the employment relationship and in relation to the employment relationship;
- for the purpose of protecting the safety and health of workers;
- for the purpose of producing and delivering promotional material;
- for the purpose of establishing a contractual relationship and exercising rights and obligations from the same;
- for the purpose of managing and administering business processes related to the fulfillment of contracts and realization of rights and obligations from the same including processing of payments, bookkeeping purposes, auditing, collection of claims and support services related to the said;
- for the purpose of harmonization and fulfillment of our legal obligations as well as the obligations that may arise from European Union law as well as the rights of third countries to the extent applicable to the scope and content in which these rights do not contradict the law of the Republic of Croatia;
- for the purpose of analyzing and improving our services and communicating with you;
- for the purpose of protecting security and managing access to our business premises, IT and communication system, online platforms, web sites;
- for the purpose of identifying a person authorized to represent our contractual partners, signing orders and accepting bids and concluding a contractual relationship with us;

- for the purpose of respecting court decisions and decisions of public bodies and legal persons with public authority and the exercise of our rights and the law of interest;
- for the purpose of keeping records of statistics related to our business;
- for the purposes of marketing, promotion and propaganda;
- for any purpose deemed necessary in connection with the achievement of any of the foregoing purposes.

For the purpose of communicating with marketing services, provided that such obligation is prescribed by law, we will only send your data for which you have given your consent to and only for as long as you do not withdraw your consent. We will not use your data to take any other action or profile creation except in the cases mentioned here.

Depending on what Permitted Purpose we are processing, we may process your personal data on the following legal grounds:

- if you have given consent for processing your personal data in one or more Permitted Purposes;
- processing is necessary for the performance of the contract in which you are a party or in order to take action on your request prior to the conclusion of the contract;
- processing is necessary for the respect of our legal obligations;
- processing is necessary to protect your key interests;
- processing is necessary for the purposes of our legitimate interests in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and on the exclusion of Directive 95 / 46 / EC (hereinafter: GDPR).

6/ LOG DATA

Each time you use our website or the Platform, in the event an error occurs we may collect data and information through a third party under the name Log Data. Log Data may contain details like IP address, device name, OS version, configuration, date and time of use as well as other statistical data.

7/ (COOKIES)

Cookies are files containing small amount of data which are usually used as a unique anonymous identifier. They are dispatched to your browser from the web locations you visit and are stored in the internal memory of the device.

We do not explicitly use cookies.. However, we may use third part codes and libraries which do use cookies to collect information for the improvement of the services. You have an option of accepting or refusing these cookies as well as knowing when a cookie is being transmitted to your device. Refusing to accept cookies may result in difficulties in using our website or Platform or a total inability of use.

8/ WITH WHOM WE CAN SHARE YOUR PERSONAL DATA

We outline the legal situations in which your personal data may be shared.

If you are a business partner, we may share your personal data with external associates such as law firms, accounting services, tax consultants, credit bureaus and financial institutions, business entities with whom cooperation is necessary for the exercise of rights and obligations arising from the mutual contractual relationship (such as printing offices), billing agencies, public bodies and public authorities when it is necessary to protect contractual rights and / or claims, or when it is in the public interest, or when it is a legal obligation.

Your personal data may be shared on a confidential basis with third parties in order to obtain your opinion regarding the quality of our products and services to help us improve the quality of our products and services.

We may share your personal data with third parties who have transferred or waived the rights from a contractual relationship with you.

We are also authorized to instruct third parties to process your personal data on our behalf and for our account and in accordance with our instructions as a controller, in which case we assume the responsibility for the confidentiality and security of your personal data. In this case, the Company remains fully responsible to you for the security and secrecy of personal data and will use all the necessary measures that require the relevant regulations to ensure the integrity and security of your personal data.

We may also use your personal data for statistical purposes for viewing and using our web sites to improve our business and improve the quality of our web pages.

In other cases, we may disclose your personal data to a third person only if you give consent to do so, irrespective of whether the consent is contained in a separate

document or a separate clause of the contract, if this is a legal obligation or obligation to act in accordance with a court order or another public body or body public powers.

The Websites may contain links to other websites. Clicking on such a link may take you to that website. We do not control these other websites so we suggest you firstly check their respective privacy policies. We do not take any responsibility over the contents of any other websites apart from blackdragon.io and research.blackdragon.io.

9/ PERSONAL DATA OF THIRD PERSONS THAT YOU PROVIDE US

If you provide us with personal data of another person (such as members of your friends and family or one of your employees, directors or persons with whom you are in a particular business relationship), you must ensure that you are authorized to disclose their personal data so that we can process them as well as without obligation make and transmit the following actions in accordance with the terms of the Privacy Policy. You must ensure that the other person is familiar with the disclosure of their personal data to us, has consented to such disclosure, use and transfer of personal data as well as fully acquainted with the Privacy Policy content, including, but not limited to, our identity, contact information, personal data processing, right to access personal data, right to modify personal data modification, access to collected personal data personal data erasure, personal data, right to submit objections in relation on the processing of personal data, as well as the consequences in case of violation of our obligations in relation to the above mentioned.

10/ PROTECTION OF PERSONAL DATA

We will protect your personal data by applying appropriate technical and organizational security measures of the highest order in accordance with internal regulations and procedures regarding storage, disclosure and access to personal data. Personal data may be kept in paper form and stored in special electronic personal data protection systems.

11/ TRANSFER OF PERSONAL DATA

If there is a need for the Company to disclose personal data to a third country or an international organization, we will take all necessary steps to ensure that the level of protection of your personal data is in accordance with the requirements of the Regulation and other applicable regulations of the Republic of Croatia. This is ensured by, inter alia, the application of standard contractual clauses issued by the European

Commission (Commission Decision of 15 June 2001 on standard contractual clauses for the transfer of personal data to third countries in accordance with Directive 95/46 / EC and Commission Decision of 27 December 2004 amending Decision 2001/497 / EC with regard to the introduction of an alternative set of standard contractual clauses for the transfer of personal data to third countries). In the case of such transmission, the recipient of personal data in a third country or an international organization shall ensure the level of protection as required by the Regulation. In the case of transferring personal data to third parties, the Company shall ensure that these persons provide the same level of protection as the Company provides.

12/ CHANGES OF PERSONAL DATA

If any personal data you have provided to us change (e.g. your email address, residence address etc.) or if you are aware that we have inaccurate personal data, please let us know by emailing us to the following e-mail address: hello@blackdragon.io

The Company is not liable for any losses incurred from incorrect, inaccurate, defective or incomplete personal data provided to us.

13/ HOW LONG DO WE STORE PERSONAL DATA

Your personal data will be deleted when the reasonable need for their safekeeping for Permitted Permission is gone to the extent applicable when you withdraw the consent, provided that we are not obliged to keep personal data under statutory obligations. In any case, your personal data will be kept as long as there is a need for their safekeeping for the purpose of realizing the rights and obligations from the contract or business relationship, including the need for enforced collection of the claim.

14/ YOUR RIGHTS

Subject to the conditions prescribed by the Regulation or the regulations of the Republic of Croatia, you have the right to withdraw the consent (if the personal data processing is based on the consent and there is no other legal basis for it), the right of access to the personal data collected, the right to request the copy of the personal data we keep, the right to request the modification of the collected personal data, the right to delete personal data, the right to transfer of collected personal data, the right to object to the processing of personal data. If you opt for any of the aforementioned, please contact us by e-mail to: hello@blackdragon.io. When submitting, we may ask you to prove your identity by submitting a valid copy of a personal document from which you can identify your identity with the purpose of respecting the applicable regulations and preventing unauthorized disclosure of personal data. We reserve the right to charge you additional

fees if you abuse your right to access personal data, for example, in the case of reinvestment or requesting additional copies of documents without reasonable grounds. We will consider all your requests and complaints we receive and respond timely to them. If you are not satisfied with our response, you can refer your complaint to the Personal Data Protection Authority - the Personal Data Protection Agency.

Contact information of the Croatian Personal Data Protection Agency:

Selska cesta 136

HR - 10000 ZAGREB

Tel. 00385 (0)1 4609-000

Fax. 00385 (0)1 4609-099

E-mail: azop@azop.hr

Web: www.azop.hr

15/ PRIVACY POLICY CHANGES

This Privacy Policy comes into force on 25.03.2021. We reserve the right to make changes from time to time that will respond to changed procedures and the manner of processing personal data or changed legal circumstances. Amendments will take effect on the day of publication.

16/ HOW TO CONTACT US

We are grateful for your opinion on our Privacy Policy. You can contact us via e-mail at: hello@blackdragon.io or in writing by sending a letter to the business address of the Company's head office.

BD Innovation Hub d.o.o.