

# PRIVACY POLICY

*Last updated: May 24, 2023*

This Privacy Policy describes how dclex inc., (“**Dclex**”, “**we**”, “**us**” or “**our**”) handles personal information that we collect through our digital properties that link to this policy, including the website dclex.com, along with all associated websites, domains and subdomains of Dclex (collectively, the “**Website**”).

## PERSONAL INFORMATION WE COLLECT

**Information you provide to us.** Personal information you may provide to us through the Website or otherwise includes:

- **Contact data**, such as your first and last name, email address, mailing address, professional title and company name (if applicable), and phone number.
- **Communications data** based on our exchanges with you, including when you contact us through the Website, social media, email or otherwise.
- **Research data**, such as your responses to surveys that we might ask you to complete for research purposes related to our business.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Profile data**, such as your cryptocurrency address that you may need to use certain features on the Website.
- **Payment data** needed to complete transactions, including your cryptocurrency address.
- **Technical Data**, such as your blockchain-based digital wallet address to access some or all of the services provided on the Website.
- **Other data** not specifically listed here, which we will use as described in this policy or as otherwise disclosed at the time of collection.

At the moment, we do not collect all the personal information described above, but we may collect some or all of it in the future.

**Third-party sources.** We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Data providers**, such as information services and data licensors that provide demographic and other information that we use to provide the Website.

**Automatic data collection.** We, our service providers, and our business partners may automatically log certain data about you, your computer or mobile device, and your interaction over time with the Website, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 5G), and general location information such as city, state or general geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing the Website, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Communication interaction data** such as your interactions with our email, or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

**Cookies and similar technologies.** Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices to allow web servers to record users’ web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our Website may include both “session cookies” that are deleted when a session ends, “persistent cookies” that remain longer, “first party” cookies that we place and “third party” cookies that our service providers place.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

We may use cookies to allow the technical operation of the Website, enhance the functionality of the Website, and help us understand user activity on the Website (including which pages are most and least visited and how visitors move around the Website, as well as user interactions with our emails). We currently do not support “Do Not Track” requests.

## HOW WE USE YOUR PERSONAL INFORMATION

We may use your personal information for the following purposes (or in other ways that we ask you for at the time we collect it):

**Website delivery and operations.** We may use your personal information to:

- provide, operate and improve the Website and our business;
- communicate with you about the Website, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Website and our communications; and
- provide support for the Website, and respond to your requests, questions and feedback.

**Research and development.** We may use your personal information for research and development purposes, including to analyze and improve the Website and our business. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We convert personal information into anonymous or de-identified data by removing information that makes the data personally identifiable to you. We may use this anonymous or de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Website and promote our business.

**Marketing.** We and our service providers may collect and use your personal information to send you direct marketing communications. You may opt-out of our marketing communications as described in the “Opt-out of marketing” section below.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Website; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

*With your consent.* In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

## **HOW WE SHARE YOUR PERSONAL INFORMATION**

We may share your personal information to the extent necessary with the following parties (as well as otherwise described in this policy or at the time of collection):

- **Service providers.** Third parties that provide services on our behalf or help us operate the Website or our business (such as hosting, information technology, customer support, email delivery, customer research, marketing, and website analytics).
- **Third parties designated by you.** We may share your personal data with third parties where you have instructed us or provided your consent to do so. We will share personal information that is needed for these other companies to provide the services that you have requested.
- **Business and marketing partners.** Third parties with whom we co-sponsor events, with whom we jointly offer products or services, or whose products or services may be of interest to you.
- **Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they provide to us.
- **Legal authorities.** Law enforcement and governmental authorities as we believe in good faith to be necessary or appropriate for the “compliance and protection purposes” described above.

- **Business transferees.** Buyers and other relevant investors or participants in business transactions (including negotiations of, or due diligence for, such transactions) involving a corporate sale, merger, consolidation, acquisition, reorganization, or other disposition of all or any part of Dclex.

Please note that we use Google Analytics to help us understand how our customers use the Website. You can read more about how Google uses your personal information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>. You can opt out of targeted advertising here: FACEBOOK <https://www.facebook.com/settings/?tab=adsGOOGLE> - <https://www.google.com/settings/ads/anonymous> BING <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>.

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

## **YOUR CHOICES**

You have a number of choices when it comes to the personal information you provide to Dclex:

- **Access or update your information.** If you have registered for an account with us through the Website, you may review and update certain account information by logging into the account.
- **Opt-out of marketing communications.** You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. Even if you choose to opt-out of marketing-related emails, you may continue to receive necessary service-related and other non-marketing emails.
- **Declining to provide information.** We need to collect personal information to provide certain services. If you choose not to provide the information we identify as required or mandatory, we may not be able to provide you those services.

## **OTHER SITES AND SERVICES**

The Website may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services that you use.

## **SECURITY**

We employ technical, organizational and physical safeguards that are designed to protect the personal information we collect (including with respect to personnel, facilities, hardware and software, storage and networks, access controls, monitoring and logging, vulnerability and breach detection, incident response, and encryption). However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

In the case of a data security breach involving your personal information, we will notify you without undue delay after we become aware of such breach, as required by applicable law.

## **JURISDICTION-SPECIFIC RIGHTS**

***Your Rights under the General Data Privacy Regulation (“GDPR”).*** If you are a resident of the European Union (EU) and European Economic Area (EEA), GDPR affords you certain rights. These include:

- The right to access, delete, or update the personal information we have on you
- The right to have your personal information rectified if it is incomplete or incorrect
- The right to object to our processing of your personal information
- The right to request that we restrict the processing of your personal information
- The right to request a copy of your personal information in a machine-readable and commonly used format
- The right to withdraw your consent at any time where we rely on your consent to process your personal information

To exercise any of the above rights, please send a request to [info@dcllex.com](mailto:info@dcllex.com). Personal information may be processed outside your jurisdiction, and in countries that are not subject to an adequacy decision by the European Commission or your local legislature and/or regulator, and that may not provide for the same level of data protection as your jurisdiction, such as the European Economic Area.

We are based in Canada and the information we collect is governed by Canadian law. By accessing or using the Website or otherwise providing information to us, you consent to the processing and transfer of information in and to Canada and other countries, where you might not have the same rights and protections as you do under local law. We may be obligated to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. You have the right to complain to a Data Protection Authority (as defined by the GDPR) about our collection and use of your personal information. For contact details of your local Data Protection Authority, please see: [http://ec.europa.eu/justice/data-protection/article-29/structure/dataprotection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/dataprotection-authorities/index_en.htm).

***Your Rights under the California Consumer Privacy Act (“CCPA”).*** If you are a California resident, you are entitled to learn what data we collect about you, ask to delete your data and ask us not to sell it. You may request what personal information we have about you. If you make this request, we will return to you:

- The categories of personal information (as defined by the CCPA) we have collected about you.
- The categories of sources from which we collect your personal information.
- The business or commercial purpose for collecting or selling your personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we have collected about you.
- A list of categories of personal information that we have sold, along with the category of any other company we sold it to. If we have not sold your personal information, we will inform you of that fact.
- A list of categories of personal information that we have disclosed for a business purpose, along with the category of any other company we shared it with. Please note, you are entitled to ask us to provide you with this information up to two times in a rolling twelve (12) month period. When you make this request, the information provided may be limited to the personal information we collected about you in the previous twelve (12) months.

Regarding cookies: under the CCPA, you have the right to opt-out of our use of cookies for advertising purposes. The Website allows for an alert and popup where you can disable cookies if you wish.

If you request we delete your data pursuant to the CCPA, we will delete the personal information we hold about you as of the date of your request from our records and direct any service providers to do the same. In some cases, deletion may be accomplished through deidentification of the information. If you choose to delete your personal information, you may not be able to use certain functions that require your personal information to operate.

We will not discriminate against you under any circumstances for exercising your rights in connection with the CCPA. To exercise your California data protection rights described above, please send a request to [info@dcllex.com](mailto:info@dcllex.com)

## **CHILDREN**

The Website is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through the Website from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this policy at any time. If we make material changes to it, we will notify you by updating the date of this policy and posting it on the Website or other appropriate means. Any changes to this policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Website after the effective date of any modified policy indicates your acceptance of the modified policy.

## **CONTACT US**

To exercise your choices or if you have questions about this policy or our privacy practices, please contact us at [info@dclex.com](mailto:info@dclex.com).