

BIG FAN
PRIVACY POLICY

Last updated: 27 July 2021

We are committed to respecting your privacy and protecting your personal data. This privacy and cookie policy ("**Policy**") sets out how we use data relating to you and applies to all use of your personal data by MORIOR INVICTUS LIMITED, a limited company registered in the Republic of Ireland with company Number 617012, with the registered office address of 32 Washington Street, Cork, Ireland, T12T880 ("**Big Fan**", "**we**", "**us**" or "**our**").

This Policy sets out the basis on which personal data will be processed by us. This Policy applies to personal data we may collect from you, or that you provide to us, through or in connection with our Platform, as available at www.bigfan.io ("**Platform**"). Through our Platform, from time to time and subject to our Terms and Conditions available at [\[INSERT LINK\]](#), we allow users to purchase and display certain identifiable, non-fungible, non-replicable and non-severable cryptographic assets recorded by way of distributed ledger technology ("**Assets**"). The Assets are used as proof of authenticity and ownership over the rights vested in and to certain digital content ("**Content**"), including but not limited to: graphical representations, illustrations, photographs, recordings, sound tracks, audio visual material, interactive content (including video game assets), and literary works of any kind ("**NFTs**").

Please read the Policy carefully to understand our views and practices regarding your personal data on the Platform.

We will only collect and process information about you in accordance with this Policy and we will only use information collected about you in accordance with applicable data protection laws including without limitation the Data Protection Act 2018 and the UK GDPR (as defined in the Data Protection Act 2018). Where we decide the purpose or means for the processing of the personal data that you provide when using the Platform, we are the "data controller".

[Note to Big Fan: We have prepared this policy for English law compliance. Down the line we can absolutely explore localisation of the policy or preparing local versions or amendments to meet the requirements of other specific territories as required – just let us know and happy to discuss further.]

You have the right to object to the processing of your personal data, including where your personal data is being processed for direct marketing purposes. Further information on this right, and your other rights, is set out below.

If you have any concerns over privacy, or this Policy, contact us at [\[INSERT\]](#).

1. how we collect and use your personal data

[Note to Big Fan: Please closely consider this table and let us know if you think any further details should be added to ensure it reflects your data processing activities for the Platform, the purposes for the processing and any third parties the data is shared with.]

1.1 The table below explains what data we collect, how we use it, and which recipients it might be shared with.

Your data	How we use it	Third Party Recipients

<p>Platform support / enquiry information (<i>information we receive when you access the Platform, and/or in touch with us via our Platform</i>):</p> <ul style="list-style-type: none"> • Contact details (email); • MetaMask address; and • Other personal data you may send to us. 	<p>In line with the legitimate interest we have in promoting our business, we will process your enquiries to provide you with information about the services we offer. We may also use the email address you provide to us to confirm successful purchase of your right to mint the NFT (if any).</p> <p>This might include replying to your enquiry. We may also process enquiries to take steps you ask of us with a view to entering into an agreement to provide you with our services.</p> <p>You are under no obligation to provide us with any details, but if you don't provide all relevant information, we may not be able to help.</p>	<p>N/A.</p>
<p>Platform analytics and usage information (<i>collected automatically when you access and use the Platform</i>):</p> <ul style="list-style-type: none"> • IP address; • Location (country and city); • IDFA and/or AAID (advertising-related identifying data); • Unique device ID, hardware manufacturer and model; • Operating system and version. 	<p>We may collect this data so that we can understand usage of our Platform, analyse and improve our Platform and develop new services or new parts thereof. In some cases it may also help us to identify problems (e.g. bugs or problems interfering with the access to and use of the Platform as intended).</p> <p>In many cases the data would be aggregated and/or anonymised so that it would not identify you.</p> <p>To the extent this data includes your personal data, we rely upon your prior consent for us to process it for our analytics and research and development purposes. You can withdraw your consent at any time by contacting us.</p>	<p>Third parties who provide us with services, such as for analytics, advertising or attribution, may receive this information. Please see our Cookie Policy (below), as available at [INSERT], for the list of our partners.</p>

2. Your Rights In Relation To Your Personal Data

2.1 You have certain rights over the way we process personal data relating to you. We aim to comply without undue delay, and within one month at the latest, in response to any requests submitted by you to us:

- for a copy of personal data we are processing about you and/or to have inaccuracies corrected;
- to restrict, stop processing, or to delete your personal data;

- for a machine-readable copy of your personal data, which you can use with another service provider. Where it is technically feasible, you can ask us to send this information directly to another provider if you prefer; and
- to make a complaint to a data protection regulator. You may contact them at: <https://ico.org.uk/concerns/>.

2.2 To make a request in relation to any of the aforementioned rights, please send your request to

2.3 You may request deletion of your personal data by sending an e-mail to . Please note that some information may remain in our private records after deletion. We may use any aggregated data derived from or incorporating your personal data but not in any manner that would identify you personally.

3. DISCLOSURE OF YOUR Personal DATA

3.1 We will share your personal data with third parties only in the ways that are described in this Policy.

3.2 Group, suppliers, subcontractors, service providers. We keep your personal data confidential, but may disclose it to any member of our corporate group, our personnel, suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this Policy.

3.3 Government authorities. In addition, we may disclose your personal data to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

3.4 Potential acquirers or investors. If we are involved in a merger, acquisition, or sale of all or a portion of our business or assets, the personal data we hold may be included as part of that sale, in which case you will be notified via email, your account and/or a prominent notice on the Platform of any changes in ownership or use of your personal data, as well as any choices you may have.

3.5 Enforcement. We may also disclose your personal information to third parties in order to enforce or apply the terms of agreements, to investigate potential breaches, or to protect the rights, property or safety of us, our personnel or customers, or others.

3.6 Stores. We may also disclose your personal data, to the extent necessary if that is required, for example, for fulfilment of an order you make or in order to investigate or prevent fraud.

3.7 We only permit our suppliers and subcontractors to process your personal data for specified purposes and in accordance with our instructions. All our third party service providers are required to take appropriate security measures to protect your personal data.

4. Data Retention

[Note to Big Fan: you may want to consider including more detailed information about how long exactly each different type of information is held by the company for. Happy to discuss further.]

4.1 We will only hold data about you for as long as necessary, bearing in mind the purpose for which that data was collected, or as otherwise described in this Policy.

4.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

5. **Security**

5.1 We will take commercially reasonable, appropriate technical and organisational measures to ensure a level of security appropriate to the risk that could be encountered via the use of the Platform taking into account the likelihood and severity those risks might pose to the rights and freedoms of our Platform visitors and customers.

5.2 In particular, we will take precautions to protect against the accidental or unlawful destruction, loss or alteration, and unauthorised disclosure of or access to the personal data transmitted, stored or otherwise processed by us.

6. **International Data Transfers**

6.1 Where necessary, there are agreements in place to ensure that personal data is processed using appropriate safeguards that meet the requirements of data protection laws. Such appropriate safeguards may include standard data protection clauses adopted by a data protection regulator and approved by the European Commission, such as the European Commission's standard contractual clauses, or other appropriate measures.

6.2 If you would like to find out more about these safeguards or if you have any other queries or comments in relation to this Policy, please let us know by emailing us at

7. **Children**

7.1 We do not make the Platform available to persons under the age of 18. For more, please see our Terms and Conditions found here: [\[INSERT LINK\]](#).

8. **General**

8.1 If you follow a link from the Platform to any third party platforms, you should be aware that those Platforms may have their own privacy policies. We do not accept any responsibility or liability for those Platforms. Please check the policies of any third party Platforms before submitting any personal data to those Platforms.

8.2 We may make changes to this Policy in the future, which will be posted on this page. You should check this page from time to time to ensure you are aware of any changes. Where appropriate we may notify you of changes by email.

8.3 All questions, comments or enquiries should be directed to us. We will try to respond to you within 48 hours or otherwise within a reasonable time.

CONTACT US

E-mail:

COOKIE POLICY

Cookies (and equivalent devices in the context of mobile devices) are small text files that are placed on your device by websites that you visit and mobile applications you use. They are widely used in order to make websites and applications work, or work more efficiently, as well as to provide information to the owners of the websites and app.

The below explains the main cookies we use in our Platform and why:

Cookie/SDK /API		Purpose/ Third Party Access

COOKIE DURATIONS

[Note to Big Fan: please confirm how long Cookies are going to stay on the users' terminal]

HOW DO I CHANGE MY COOKIE SETTINGS

[Note to Big Fan: Could you please also confirm whether you will be providing users with the ability to customise privacy and cookies setting through the Platform?]