Sanguine Labs Ltd.

# Privacy Policy

Your advisory partners in the Digital Asset industry

www.axisadvisory.xyz 2024

# Private and Confidential

TO:

Sanguine Labs Ltd. [YS] Providence, Oceanic Motors Building, Second Floor, Room No. F2-1, Mahé, Seychelles

(hereinafter referred to as the "Client")

Dear Client,

We have been asked by the Client to provide a 'Privacy Policy' document in relation to the Yeet Finance project.

Text of the Privacy Policy hereunder

## PRIVACY POLICY

Yeet Finance Privacy Policy

Last update: September 13, 2024

At Sanguine Labs (hereafter "Yeet", "we", "us", "our"), protecting the privacy of our users is a top priority. This Privacy Policy explains how we collect, use, and share information when you use our product, Yeet Finance, accessible via our website https://www.yeetit.xyz and application (collectively referred to as the "Interface").

This privacy policy is intended to inform you about the processing of your personal data when you access and/or use our Interface (the "Privacy Policy", the "Policy"). Therefore, it applies to all your interactions with us via our Interface. We advise you to read this Policy carefully to understand how we collect and process data and for which purpose.

This Privacy Policy does not apply to any processing of data collected via channels other than the Interface (including any other services or applications provided by third parties). For those, we advise you to consult the corresponding and applicable privacy policies.

We advise you to read this Policy carefully to understand our practices regarding your personal data and how we treat it.

We, Sanguine Labs Ltd., act as the data controller of your personal data. This means we decide "why" and "how" your personal data is processed in connection with the Interface and in line with this Policy.

#### 1. Information We Collect

We collect the following categories of data from users:

- Demographic Information: Collected via Google Analytics, including but not limited to age, gender, location, and interests.
- On-Chain Addresses: We collect blockchain addresses that interact with Yeet Finance's products and services.
- Browser Information: Collected for the purpose of error tracking and troubleshooting using Track.js.
- Cookies: We use cookies through Google Analytics and Track.js for enhancing the user experience and monitoring website performance.

## 2. Purpose of Data Collection

We collect and process this information solely for the purpose of improving the functionality of our website and services. The data helps us to:

- Analyse website traffic and user behaviour to optimize website performance.
- Ensure compatibility and functionality of our services.
- Diagnose and resolve technical issues that arise.

We adhere to the data minimization principle, ensuring that only the necessary information is collected and processed for the stated purposes.

# 3. Legal Basis for Processing

We process personal data under the following legal bases in accordance with the Seychelles Data Protection Act and GDPR:

- Legitimate Interest: Our processing of demographic, browser, and on-chain address data is necessary for the legitimate interest of improving website functionality, diagnosing issues, and ensuring security.
- Consent: By using our website, you consent to the use of cookies and similar tracking technologies as outlined in this policy.

Under GDPR, these legal bases ensure that our data processing activities comply with Article 6 of the regulation.

#### 4. Use of Cookies

Cookies are small files placed on your device to help us improve your browsing experience. We use cookies for:

- Tracking site usage via Google Analytics.
- Monitoring website performance and error tracking through Track.js.

Under GDPR, users have the right to be informed about the use of cookies and can opt out by managing their browser settings. However, blocking cookies may affect the functionality of our website.

#### 5. Data Retention

We retain the collected data only for as long as necessary to fulfil the purposes outlined in this Privacy Policy or as required by law. Once the purpose of data collection is fulfilled, we anonymize or delete the data in compliance with the Seychelles Data Protection Act and GDPR Article 17, which governs the right to erasure ("right to be forgotten").

# 6. Security Measures

We employ reasonable and appropriate technical, organizational, and physical measures to safeguard personal data. This includes encryption and pseudonymization techniques where applicable, to prevent unauthorized access, disclosure, or modification of personal data. This complies with GDPR Article 32, which requires appropriate security of data.

## 7. Sharing of Data

We do not share, sell, or rent your personal data with third parties except as required by law or to comply with legal obligations. Google Analytics and Track.js are third-party services used solely for website analytics and error tracking purposes, and any data shared with these parties is done in compliance with GDPR Article 28, which governs third-party processors.

## 8. Your Rights

In accordance with the Seychelles Data Protection Act, 2023 and GDPR, you have the following rights:

- Right to Access: Request a copy of the data we hold about you (GDPR Article 15).
- Right to Rectification: Request correction of inaccurate or incomplete information (GDPR Article 16).
- Right to Erasure: Request the deletion of your personal data (GDPR Article 17).
- Right to Restrict Processing: Request the restriction of processing under certain circumstances (GDPR Article 18).
- Right to Object: Object to the processing of your personal data for specific purposes (GDPR Article 21).
- Right to Data Portability: Request your data in a machine-readable format to transfer to another controller (GDPR Article 20).
- Right to Withdraw Consent: Withdraw your consent to the use of cookies at any time by adjusting your browser settings.

## 9. International Data Transfers

As part of our processing, data may be transferred outside the Seychelles or the European Union. For transfers of data outside the European Economic Area (EEA), we ensure that:

- The recipient country has been deemed to provide an adequate level of protection for personal data by the European Commission (GDPR Article 45); or
- Appropriate safeguards are in place, such as binding corporate rules or standard contractual clauses (GDPR Article 46).

## 10. Data Breach Notification

In case of a data breach that poses a risk to your rights and freedoms, we will notify the appropriate authorities within 72 hours in compliance with GDPR Article 33 and the Seychelles Data Protection Act. If the breach poses a high risk to you, we will also inform you directly, in accordance with GDPR Article 34.

# 11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time in accordance with changes in legal or regulatory requirements. We will notify you of any changes by posting the new policy on our website.

## 12. Contact Information

If you have any questions or concerns regarding this Privacy Policy or how we handle your personal data, please contact us at:

Sanguine Labs Ltd.

Email: [info@digitalpartnersnetwork.com]

Address: [YS] Providence, Oceanic Motors Building, Second Floor, Room No. F2-1, Mahé,

Seychelles

This is the end of the Privacy Policy

Avv. Joseph Axisa



Your advisory partners in the Digital Asset industry



(S) www.axisadvisory.xyz



admin@axisadvisory.xyz