

## Vinland Privacy Policy

**Last Updated:** February 28, 2023

This Privacy Policy is designed to help you understand how **Jade Frontier Inc.** (“**Vinland**”, “**we**”, “**us**”, “**our**”) collects, uses, and shares your personal information on the Vinland webPlatform located at [vinland.gg](https://vinland.gg) and our discord channel located at <https://discord.gg/pjfd3CjQ> (collectively, the “**Platform**”). This Privacy Policy is to help you understand and exercise your privacy rights.

### 1. SCOPE

This Privacy Policy applies to personal information processed by the the Platform.

### 2. CHANGES TO OUR PRIVACY POLICY

We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Platform after the new Privacy Policy takes effect.

### 3. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Platform, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Platform, and information from other sources such as third-party services and organizations, as described below.

#### 1. Information You Provide to Us Directly

We may collect the following personal information that you provide to us via the following ways:

- **Your Communications with Us.** We may collect personal information, such as your email address, when you request information about our Platform or otherwise communicate with us.
- **Your Interactions with our Smart Contracts.** When you interact with smart contracts on our Platform, you share with us your public blockchain address and your associated activity.
- **Interactive Features.** We and others who use our Platform may collect personal information that you submit or make available through our interactive features (e.g., commenting functionalities and social media pages). Any personal information you provide on the public

sections of these features will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.

- **Payment Information.** We may collect personal information, such as your address, mailing address, credit card details but our standard procedure is to not collect payment or banking information as we utilize third-party APIs such as Stripe.
- **Sweepstakes or Contests .** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.

## 2. **Information Collected Automatically**

We may also collect personal information automatically when you use our Platform through the following methods:

- **Automatic Data Collection .** We may collect certain information automatically when you use our Platform, such as your Internet protocol (IP) address, user settings, cookie identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Platform, such as pages that you visit before, during and after using our Platform, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Platform.
- **Cookies, Pixel Tags/Web Beacons, and Other Technologies.** We, as well as third parties that provide content, advertising, or other functionality on our Platform, may use cookies, pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through your use of our Platform.
- **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Platform that collects information about engagement on our Platform. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Platform, applications, and tools that are required to identify irregular webPlatform behavior, prevent fraudulent activity and improve security or that allow you to make use of our functionality;

- **Performance-Related.** We may use Technologies to assess the performance of our Platform, including as part of our analytic practices to help us understand how individuals use our Platform.
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Platform. This may include identifying you when you sign into our Platform or keeping track of your specified preferences, interests, or past items viewed; and
- **Advertising- or Targeting-Related .** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Platform or on third-party webPlatforms.

*See Section 6 below to understand your choices regarding these Technologies.*

- **Analytics .** We may use Technologies and other third-party tools to process analytics information on our Platform.
- **Google Analytics .** For more information about how Google uses your data (including for its own purposes, e.g., for profiling or linking it to other data), please visit [Google Analytics' Privacy Policy](#). To learn more about how to opt-out of Google Analytics' use of your information, please click [here](#).
- **Social Media Platforms.** Our Platform contain social media buttons such as Twitter and Discord (that might include widgets such as the “share this” button or other interactive mini programs). These features may collect your IP address, which page you are visiting on our Platform, and may set a cookie to enable the feature to function properly. Your interactions with these Platforms are governed by the privacy policy of the relevant corporate entities providing such Platforms.

### 3. **Information Collected from Other Sources**

- **Third-Party Sources.** We may obtain information about you from other sources, including through third-party services and organizations. For example, if you access our Platform through a third-party application, such as a third-party login service or a social networking Platform, we may collect information about you from that third-party application that you have made available via your privacy settings.

## 4. **HOW WE USE YOUR INFORMATION**

We use your information for a variety of business purposes, including to operate our Platform, for administrative purposes and to market our products and services, as described below.

### 1. **Operating our Platform**

We use your information to fulfill our contract with you and provide you with our Platform, including but not limited to:

- Managing your information;
- Providing access to certain areas, functionalities, and features of our Platform;
- Communicating with you about your activities on our Platform and policy changes;
- Processing payments via our third party payment processors;
- Processing your digital wallet information to facilitate transactions via the Platform; and
- Allowing you to register for events.

## 2. **Administrative Purposes**

We use your information for various administrative purposes, including but not limited to:

- Pursuing our legitimate interests such as research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Platform;
- Improving, upgrading or enhancing our Platform;
- Developing new products and our Platform;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities;
- Debugging to identify and repair errors with our Platform;
- Auditing relating to interactions, transactions and other compliance activities;
- Enforcing our agreements and policies; and
- Complying with our legal obligations.

## 3. **Marketing our Products and Services**

We may use personal information to tailor and provide you with content. We may provide you with these materials as permitted by applicable law. If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in Section 14.

## 4. **Other Purposes**

We also use your information for other purposes as requested by you or as permitted by applicable law including but not limited to the following scenarios:

- **Consent.** We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

- **De-identified and Aggregated Information.** We may use personal information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, de-identified location information, information about the device from which you access our Platform, or other analyses we create.

## 5. HOW WE DISCLOSE YOUR INFORMATION

We disclose your information to third parties for a variety of business purposes, including to provide our Platform, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

### 1. Disclosures to Provide our Platform

The categories of third parties with whom we may share your information are described below.

- **Notice Regarding Use of Blockchain.** If you elect to interact with any smart contracts, or sign transactions, information about your transactions will be provided to the applicable blockchain and may be accessible to third parties due to the public nature of the blockchain ledgers.
- **Third Party WebPlatforms and Applications.** You may choose to share personal information or interact with third-party webPlatforms and/or third-party applications which may reference or link to our Platform, including, but not limited to, third-party electronic wallet extensions (such as Metamask). Once your personal information has been shared with a third-party webPlatform or a third-party application, it will also be subject to such third party's privacy policy. We encourage you to closely read each third-party webPlatform or third-party application privacy policy before sharing your personal information or otherwise interacting with them. Please note that we do not control and we are not responsible for the third-party webPlatform's or the third-party application's processing of your personal information, or the privacy practices or content of such other webPlatforms or applications. Providing personal information to third-party webPlatforms or applications is at your own risk.
- **Service Providers .** We may share your personal information with our third-party service providers who use that information to help us provide our Platform. This includes service providers that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners .** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your

personal information with business partners with whom we jointly offer products or services.

- **Affiliates** . We may share your personal information with members of our corporate family and our affiliates.
- **APIs/SDKs** . We may use third-party application program interfaces (“ **APIs** ”) and software development kits (“ **SDKs** ”) as part of the functionality of our Platform. For more information about our use of APIs and SDKs, please contact us as set forth in Section 14 below.

## 2. **Disclosures to Protect Us or Others**

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) protect your, our, or others’ rights, property, or safety; (iii) enforce our policies or contracts; (iv) collect amounts owed to us; or (v) assist with an investigation or prosecution of suspected or actual illegal activity.

## 3. **Disclosure in the Event of Merger, Sale, or Other Asset Transfers**

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

## 6. **YOUR PRIVACY CHOICES AND RIGHTS**

**Your Privacy Choices** . The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **“Do Not Track.”** Do Not Track (“**DNT**”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies** . You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Platform may not work properly.

Please note you must separately opt out in each browser and on each device.

**Your Privacy Rights** . In accordance with applicable law, you may have the right to:

- **Access Personal Information** about you, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your

personal information; or (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company (the right of data portability);

- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion** of your personal information;
- **Request Restriction of or Object** to our processing of your personal information; and
- **Withdraw Your Consent** to our processing of your personal information.

If you would like to exercise any of these rights, please contact us as set forth in Section 14 below. We will process such requests in accordance with applicable laws.

## **7. SECURITY OF YOUR INFORMATION**

We take steps designed to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

By using our Platform or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Platform. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Platform, by mail, or by sending an email to you.

## **8. INTERNATIONAL DATA TRANSFERS**

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

## **9. RETENTION OF PERSONAL INFORMATION**

We store the personal information we collect as described in this Privacy Policy for as long as you use our Platform or as necessary to fulfill the purpose(s) for which it was collected, provide our Platform, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

## **10. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS**

This Supplemental California Privacy Policy only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“**CCPA**”). The CCPA provides California residents with the right to know what categories of personal information Vinland has collected about them, and whether Vinland disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months.

### **Additional Privacy Rights for California Residents**

**“Sales” of Personal Information under the CCPA.** For purposes of the CCPA, Vinland does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age.

**Non-Discrimination.** California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

**Authorized Agent.** Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, please contact us as set forth in Section 14 below.

**Verification.** When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include confirming the email address associated with any personal information we have about you.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in Section 14 below. We will process such requests in accordance with applicable laws.

### **11. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting us as set forth in Section 14 below with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A.

### **12. CHILDREN’S INFORMATION**

The Platform is not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children. If you learn that your child has provided us with personal information without your consent, you may contact us as set forth in Section 14 below. If we learn that we have collected a child’s personal information in violation of applicable law, we will promptly

take steps to delete such information.

### **13. SUPERVISORY AUTHORITY**

If you are in the European Economic Area, Switzerland, or the United Kingdom you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

### **14. CONTACT US**

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us via our [discord](#) or via email at [hello@vinland.gg](mailto:hello@vinland.gg).