

## Privacy Policy of Nunu Spirits, Website

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## DISCLAIMER

We reserve the right at any time to: Any changes we make to the Privacy Policy will be effective immediately after we post the modified Privacy Policy on [www.NunuSpirits.io](http://www.NunuSpirits.io) . Such also applies with the relevant Nunu Spirits 1) Disclaimer 2) Terms of Use and 3) Cookies Policy.

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### 1. PRELIMINARY REMARKS

- 1.1. If you are engaged with us, please note the following:
- 1.2. **Nunu Spirits** takes data privacy seriously and maintains a Privacy Policy ("Policy") to describe how we will use information on individuals who visit this website or participate in our board and executive search and assessment services.
- 1.3. **SCOPE** This Policy only covers data collected through this website and other Nunu Spirits electronic sites and mobile applications or in the course of our services for clients. This Policy does not cover any other data collection or processing, including, without limitation, data collection practices of other web pages to which we link as they may be subject to their own privacy policies.
- 1.4. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. By using our website, you agree that we can place these types of cookies on your device.

### 2. RELATION BETWEEN WEBSITE TERMS OF USE, COOKIES POLICY, PRIVACY POLICY AND DISCLAIMER

- 2.1. Nunu Spirits is a digital ecosystem that provides its community of users with social trading services for the cryptocurrency market. The Ecosystem is operated by the Ecosystem Operator (www.NunuSpirits.io). From a legal perspective, if Nunu Spirits or the Ecosystem are referred to, the subject of any duties or obligations remains the Ecosystem Operator (i.e., the legal entity operating the Ecosystem). The Ecosystem itself is not a legal subject and cannot assume responsibilities or obligations. The Ecosystem Operator is **SeeGreen Ventures DWC-LLC**, a Company duly incorporated and validly existing under the United Arab Emirates Free Trade Zone law, whose registered office is Business Centre Building A3, Dubai World Central, Dubai, United Arab Emirates, represented by the director Martin Belobrad (hereinafter referred to as “the Company”);
- 2.2. **Cookies:** We use cookies on our website. Please refer to our Cookies Policy.
- 2.3. **Why Personal Data Is Used:** We will use your personal data to process your request, to contact you and to provide you with the information that you voluntarily have requested.

### 3. **PRIVACY STATEMENT**

- 3.1. Nunu Spirits is committed to safeguarding privacy and personal data. With a few exceptions, such as when we provide data room or e-discovery services (in the context of which our role is limited to that of a data processor), Nunu Spirits is generally the controller of personal data provided to them.
- 3.2. This Privacy Statement is intended to inform clients, prospective clients and more generally all visitors to this website about how we collect, use, share, protect or otherwise process personal data. Other policies may apply to recruitment and would be notified separately.
- 3.3. **When, How and What Personal Data We Collect**

3.3.1. In general, you are not required to provide any personal information in order to consult our website. However, you may elect to contact us by completing the form provided on the “Contact” page of this website, in which case we ask you to provide your name and email address, and to submit specific questions to us. You may also elect to contact us voluntarily by telephone or e-mail. All personal data processed by us is necessary to fulfill the purposes for which they were collected. When using the website for mere information purposes, we may also collect the personal data that your web browser transmits to our server, including your IP address, the date and time of your visit, and data relating to your operating system and web browser. We use this data to ensure the security and successful navigation on the website, and to compile statistical data on the use of our websites. During the course of an engagement, or when consideration is being given to such an engagement, we may collect and process personal data about our clients, prospective clients, their affiliates or the relevant members of their personnel.

- 3.4. **Data collected via website** If you visit our website, please note the following:
- 3.5. **Collection Methods:** When you send a message to us or otherwise send us data via our website, we can collect and use your name and email address. You will know what data we collect through the website, because you actively submit it.
- 3.6. **Collection Purposes, Use of Data:** We use the data we collect from our website for the following general purposes (this list is not exhaustive): to respond to the request that you sent us, such as your request for information on our services or your job search; to administer, protect and improve our website and our systems; to better understand the preferences of our website visitors; to compile aggregated statistics about website usage; and to inform you about our services. Like many websites, we use “cookies” or other similar technologies. Cookies allow the website to measure traffic activity on the website.

- 3.7. **Disclosures of Personal Information:** We are not in the business of selling or renting your information to third parties and do not share your personally identifiable information with others, except as follows: for the purpose of delivering our services to you; we may also share your information as required by law or in the interest of protecting or exercising our or others' legal rights, for example, in connection with court proceedings or requests from law enforcement officials. Also, we reserve the right to use and disclose any information collected via the website that is not in personally identifiable form.
- 3.8. **For instance, may also use personal data:**
- 3.8.1. to conduct pre-engagement assessments and formalities such as anti-money laundering checks, conflict checks, etc.;
  - 3.8.2. to perform the tasks entrusted to us by our clients;
  - 3.8.3. for client relationship management purposes;
  - 3.8.4. for internal administrative or operational processes;
  - 3.8.5. to analyze the services you may be interested in;
  - 3.8.6. to send invitations and information from Nunu Spirits about events, publications, and services provided by the firm; and
  - 3.8.7. to satisfy any legal, regulatory, accounting or reporting requirements.
  - 3.8.8. We will process personal data if and to the extent applicable law provides a lawful basis for us to do so and in particular:
    - 3.8.9. if the data subjects have consented to us doing so;
    - 3.8.10. if we need it to perform the contract we have entered into with a data subject;
    - 3.8.11. if we need it to comply with a legal obligation; or
    - 3.8.12. if we (or a third party) have a legitimate interest which is not overridden by the data subjects' interests or fundamental rights and freedoms. Such legitimate interests will be the provision of legal services by us, administrative or operational processes within Nunu Spirits, and direct marketing.
- 3.9. **Security:** Transmissions over the Internet are not completely secure or error-free. We take appropriate measures, however, to protect your personal information from loss, misuse, unauthorized access, disclosure, alteration and destruction.
- 3.10. **Data Collected in connection with our services:**

- 3.10.1. **Data Collection:** To provide our clients with our services and communication and collaboration among the Nunu Spirits Ecosystem. Nunu Spirits collects and processes information relating to individuals (referred to as “Personal Information”) which typically includes information in normal business contact details and professional references. Our records derive from information collected directly from you, publicly available sources and third parties.
- 3.10.2. **Data Usage:** We may use Personal Information to contact you about our services, evaluation of our services etc. We may also provide Personal Information to applicable regulators. In addition, we may also collect demographic information about you to assist our partner firms in addressing their diversity needs.
- 3.10.3. The security and protection of your Personal Data is a priority of Nunu Spirits.
- 3.10.4. The Company shall collect personal data from the users that created an Account and/or register for the newsletter.
- 3.10.5. This Privacy Notice (the “Notice”) aims to protect the privacy and the fundamental rights of the Users when their Personal data are processed by the Company, such as the fundamental rights of the Visitors while they are browsing the Website.
- 3.10.6. Capitalized terms defined in the Terms of Use are available on the Website.
- 3.10.7. The Company uses privacy by default and privacy by design standards and undertakes to store your Personal data in a secured manner and to process your Personal data with all appropriate care and attention per the laws of the United Arab Emirates (UAE), and the European Union.

#### 4. DEFINITIONS

- 4.1. The following terms, as used herein shall have the following meanings respectively unless inconsistent with the subject or context. Other capitalized terms may be defined elsewhere in this Agreement and, unless otherwise indicated, shall have such meaning throughout this Agreement.

- 4.1.1. "Data Controller" shall mean the natural or legal person, who, alone or jointly with others, determines the purposes and means of the Processing of Personal data and who is in charge of this Processing.
- 4.1.2. "Data subject" shall mean natural or legal persons whose data is processed, whether it is a User or a Visitor.
- 4.1.3. "Disclosure" shall mean making Personal data accessible, for example by permitting access, transmission, or publication.
- 4.1.4. "Personal Data Breach" shall mean a breach of security leading to the accidental or unlawful destruction, loss, or alteration of – or to the unauthorized disclosure of, or access to – Personal data transmitted, stored, or otherwise processed.
- 4.1.5. "Personal Data" shall mean all information relating to an identified or identifiable person.
- 4.1.6. "Processing" shall mean any operation or set of operations – by automated and other means – that is performed upon Personal data or sets of Personal data, such as collecting, recording, organizing, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing by transmitting, disseminating or otherwise making available, aligning or combining, or erasing.
- 4.1.7. "Recipient" means third, public authority, agency, or other body – that is, someone or something other than the Data subject or the Company – to which the Personal data is disclosed.
- 4.1.8. "User" shall mean a person which has registered on the Website.
- 4.1.9. "Visitor" shall mean any individual or legal entity browsing the Website.
- 4.1.10. "Website" or "Nunu Spirits Website" shall mean this website accessible at the following URL: [www.NunuSpirits.io](http://www.NunuSpirits.io).
- 4.1.11. "Consent" shall mean any freely given, specific, and informed indication of his or her wishes by which a Data subject signals agreement to the Processing of Personal data relating to him or her.
- 4.2. Except where the context requires otherwise, this Agreement will be interpreted as follows:
  - 4.2.1. Headings are for convenience only and shall not affect the construction or interpretation of any provision of this Agreement;

- 4.2.2. Where a word or phrase is defined, other parts of speech and grammatical forms and the cognate variations of that word or phrase shall have corresponding meanings;
- 4.2.3. Words importing the singular shall include plural and vice versa;
- 4.2.4. Reference to Articles and Schedules are to articles and schedules of this Agreement;
- 4.2.5. All words (whether gender-specific or gender neutral) shall be deemed to include each of the masculine, feminine and neutral genders;
- 4.2.6. The ejusdem generis (of the same kind) rule will not apply to the interpretation of this Agreement, accordingly, include and including will be read without limitation;
- 4.2.7. A reference to any document (including this Agreement) is to that document as amended, consolidated, supplemented, novated or replaced from time to time in terms thereof;
- 4.2.8. A reference to a statute or statutory provision includes, to the extent applicable at any relevant time;
- 4.2.9. That statute or statutory provision as from time to time consolidated, modified, re-enacted or replaced by any other statute or statutory provision whether before or after the date of this Agreement; and
- 4.2.10. Any subordinate legislation or regulation made under the relevant statute or statutory provision;
- 4.2.11. References to writing include any mode of reproducing words in a legible and non-transitory form and shall include email or other electronic communication.

## **5. SCOPE**

- 5.1. The Company provides this Notice to describe its procedures regarding the Processing and Disclosure of Personal data collected by the Company while using the Website
- 5.2. This Notice shall apply to any use of the Website, whatever the method or medium used. It details the conditions at which the Company may collect, keep, use and save information that relates to you, as well as the choices that you have made in relation to the collection, utilisation and Disclosure of your Personal data.



## 6. ACCEPTANCE

- 6.1. By browsing the Website, Visitors acknowledge that the Company may collect and process a certain number of Personal data that relate to them and that they have read and understood this Notice and agree to be bound by it and to comply with all applicable laws and regulations.
- 6.2. Users acknowledge that the Company may collect and process a certain number of Personal data that relate to them and that they have read and understood this Notice and agree to be bound by it and to comply with all applicable laws and regulations.
- 6.3. In particular, the Consent for the Processing of Personal data is given once the Visitor and/or the Users ticks the box in the pop-up window which says, "I have read the Privacy Notice and agree to be bound by it".
- 6.4. The Consent is also given when the Users freely submit to the Company the Personal Data required to become a User. This latter understands and agrees that the Company is free to use these Personal Data within the limit provided by law and this Notice.
- 6.5. If you do not agree with the terms of this Notice, please do not become a User and refrain from using the Website.

## 7. PRINCIPLE FOR PROCESSING PERSONAL DATA

- 7.1. While Processing Personal data, the Company will respect the following general principle:
  - 7.1.1. **Fairness and lawfulness**
    - 7.1.1.1. When Processing Personal data, the individual rights of the Data subjects must be protected. Personal Data must be collected and processed lawfully, in a fair manner, in good faith, and must be proportionate to the objective.
  - 7.1.2. **Restriction to a specific purpose**
    - 7.1.2.1. Personal data handled by the Company should be adequate and relevant to the purpose for which they are collected and processed. This requires, in particular, ensuring that the types of Personal data collected are not excessive for the purpose for which they are collected. Subsequent changes to the purpose are only possible to a limited extent and require substantiation.

**7.1.3. Transparency**

7.1.3.1. The Data subject must be informed of how his/her Personal data is being handled. When the Personal data is collected, the Data subject must be informed of:

- 7.1.3.1.1. the existence of the present Notice;
- 7.1.3.1.2. the identity of the Data controller;
- 7.1.3.1.3. the purpose of Personal data Processing;
- 7.1.3.1.4. third-parties to whom the data might be transmitted.

**7.2. What Rights You Have**

7.2.1. We rely on you to provide accurate, complete and current personal data to us.

7.2.2. You may also contact us to request more information in connection with our data processing activities or to exercise the rights you have as an individual in relation to the personal data we hold. These include the rights to request access to your personal data and to request a copy of the information we hold about you, to rectification of your personal data, or, in certain circumstances, to erasure of this personal data from our systems and the restriction of processing of your personal data.

7.2.3. Where we have relied on your consent as the legal grounds for processing, you may withdraw your consent at any time. Withdrawal does not invalidate the consent-based processing that occurred prior to withdrawal. You also have the right to object to the processing of your personal data and in certain limited circumstances, the right to data portability.

7.3. You have the right to contact us at any time if you wish to complain about our processing of your personal data and you may lodge a complaint at any time with a supervisory authority.

7.4. When contacting us in connection with any of your rights (described above), you will need to provide sufficient identifying information, such as name, address, and birth date before your request can be processed. We may limit or deny access to personal data where providing such access would be unreasonably burdensome or expensive in the circumstances, or as otherwise permitted by law. In some circumstances, we may charge a reasonable fee, where warranted, for access to personal data.

**7.4.1. Consent of the Data subject**

7.4.1.1. Personal data must be collected directly from the individual concerned and the Consent of the Data subject may be required before Processing Personal data. The Consent must be obtained in writing or electronically for documentation. The Consent is valid only if given voluntarily. If for any reason, the Consent of the Data subject is not given before Processing Personal data, this one should be secured in writing as soon as possible after the beginning of the Processing.

7.4.1.2. Personal data can be processed without Consent if it is necessary to enforce a legitimate interest of the Company. Legitimate interests are generally of a legal (e.g., filing, enforcing or defending against legal claims) or financial (e.g. valuation of companies) nature. The Processing of Personal data is also permitted if national legislation requests, requires or allows this.

**7.4.2. Accuracy**

7.4.2.1. Personal data kept on file must be correct and if necessary, kept up to date. Inaccurate or incomplete Personal data should not be kept on file and deleted.

**8. COLLECTED DATA**

8.1. This Notice applies to all information which is received during your visit to or use of the Website, when you subscribe to our newsletter and/or when you become a User.

8.2. In particular, the Company will collect the following Personal data:

**8.2.1. Visitors data**

8.2.1.1. When you browse the Website, even if you do not subscribe to our newsletter, do not become a User and do not contact us, the Company automatically:

8.2.1.1.1. collects your cookies;

8.2.1.1.2. uses Google Analytics;

8.2.1.1.3. uses Facebook pixel;

8.2.1.1.4. uses Zen Desk.

#### **8.2.2. Users data**

8.2.2.1. When you become a User, the Company shall collect:

8.2.2.1.1. your Ethereum address;

8.2.2.1.2. your email address;

8.2.2.1.3. your Sol address.

#### **8.2.3. Newsletter's subscriber data**

8.2.3.1. When you, as a Visitor or a User, subscribe to our newsletter. We collect your IP address, your name, surname, your country of residence and your email address for the sole purpose of sending you our newsletter.

8.2.3.2. Please note that you are entitled to unsubscribe from our newsletter whenever you want and at your sole discretion by contacting us.

### **9. USE OF DATA**

9.1. The following paragraphs describe the various purposes for which the Company uses your Personal data. Please note that not all of the uses below will be relevant to every individual.

9.2. Generally, the main reason why We collect Personal data is to enable you to enjoy and easily navigate the Website, to transfer your tokens to your Ethereum or Sol address, to keep a detailed list of the Users who participates to the Referendum, to keep you updated about the result of the Referendum and/or advances of the Nunu Spirits Project. If you contact us via email to the contacts set out on the Website, We will keep a record of that correspondence.

#### **9.2.1. Users data**

9.2.1.1. Users understand and agree that their transactional information will be made public on the blockchains and, therefore, disclosed to anyone.

9.2.1.2. The Company will employ Users' Personal data to provide them with a better service, and in particular to:

9.2.1.2.1. communicate with them;

9.2.1.2.2. provide them with information about new products available, blog posts, promotions, special offers, and other information;

9.2.1.2.3. personalize the promotional offers, in particular, based upon their activity and their transaction history;

9.2.1.2.4. answer to their questions and comments;

9.2.1.2.5. send them Nunu Spirits's newsletter, unless the Users unsubscribe;

9.2.1.2.6. prevent potentially prohibited or illegal activities;

9.2.1.2.7. conduct research and compile statistics on usage patterns;

9.2.1.2.8. process transactions;

9.2.1.2.9. manage the accounts;

9.2.1.2.10. enforce the Terms of Use;

9.2.1.2.11. comply with our legal requirements;

9.2.1.2.12. as otherwise described to the Users at the point of collection.

## **9.2.2. Collect of the cookies**

9.2.2.1. A Cookie is a piece of information that is placed automatically on your computer's hard drive when you access certain websites. The Cookie uniquely identifies your browser to the server. Cookies allow the Company to store information on the server (for example language preferences, technical information, click or path information, etc.) to help make the Web experience better for you and to conduct Website analysis and Website performance review.

9.2.2.2. Most Web browsers are set up to accept cookies, although you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Note, however, that some portions of the Website may not work properly if you refuse cookies.

### **9.2.3. Use of Google Analytics**

9.2.3.1. The Website uses Google Analytics, an Internet site analysis service supplied by Google Inc. ("Google"). Google Analytics uses cookies which are text files placed on your computer to help to analyse the use made of the Website by its users. The data generated by the cookies concerning your use of the Website (including your IP address) will be forwarded to, and stored by Google on servers located outside of the UAE. Google will use this information to evaluate your use of the Website, compile reports on site activity for its publisher and provide other services relating to the activity of the Website and the use of the internet. Google may release these data to third parties if there is a legal obligation to do so or when the third parties process these data for the account of Google including, in particular, the publisher of the Website. Google will not cross-reference your IP address with any other data held by Google.

9.2.3.2. You may deactivate the use of cookies by selecting appropriate parameters on your navigator. However, deactivation of this kind might prevent the use of certain functions of the Website. By using the Website, you specifically Consent to the Processing of your Personal data by Google under the conditions and for the purposes described above.

## **10. THIRD-PARTY DISCLOSURE**

10.1. The Company may share your Personal Data to any other relevant third parties, in particular if We are requested to do so to comply with a court order or law enforcement authorities request, or if We find it necessary, as determined in the Company's sole discretion, to investigate, prevent or take action regarding illegal activities, to defend our interest or as otherwise required or permitted by law.

- 10.2. In any case, where a cross-border transfer is done, the Company ensures that adequate protection is guaranteed for Personal Data to be transferred outside of Switzerland and the European Economic Area (hereinafter: the "EEA"). In some specific cases when this level of protection is not guaranteed, the Company will obtain your prior Consent or establish with the Recipient of Personal data a contractual framework or sufficient safeguards that ensure an adequate level of protection abroad. You may request access to a copy of these safeguards by contacting the Company.
- 10.3. Unless otherwise stated, the third parties who receive data from the Company are prohibited to use this Personal data beyond what is necessary to provide the product or service to you, directly or by participating in the Company's activities.

#### **11. STORAGE OF YOUR PERSONAL DATA**

- 11.1. Your Personal data will be stored in Europe. You agree that the Company may store your Personal Data in any country of the EEA, including Switzerland.
- 11.2. The storage, as well as the Processing of your Personal Data, may require that your Personal Data are ultimately transferred/transmitted to, and/or stored at a destination outside of your country of residence, notably Switzerland. Where permitted by law, by accepting the terms of this Notice, you agree to such transferring, transmission, storing and/or Processing. You also agree that such activities may take place to or in countries offering a lower level of protection than your country of residence.

#### **12. RETENTION OF YOUR PERSONAL DATA**

- 12.1. In accordance with applicable laws, the Company will use your Personal data for as long as necessary to satisfy the purposes for which your Personal Data was collected or to comply with applicable legal requirements.

#### **13. SECURITY OF YOUR PERSONAL DATA**

- 13.1. The Company applies high industry standards and will always apply adequate technical and organisational measures, in accordance with applicable laws to ensure that your data is kept secure.

- 13.2. In the event of a Personal Data breach, the Company shall without undue delay, and where feasible, not later than 72 hours after having become aware of it, notify the breach to the competent supervisory authority, unless said breach is unlikely to result in a risk to your rights and freedoms. If the breach is likely to result in a high risk to your rights and freedoms, the Company shall communicate this breach to you, if it is feasible, without undue delay.

#### **14. ACCESS TO YOUR DATA AND INFORMATION RIGHTS**

- 14.1. You have the right to request access to or information about the Personal Data relating to you which are processed by the Company.

##### **14.2. How Long Personal Data Is Retained**

- 14.2.1. We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected and processed in compliance with this Privacy Statement. To determine the retention period for personal data, we will take into consideration the purposes for which they were collected, the amount, the nature, the sensitivity and the applicable legal requirements. At any time, you have the right to contact us to remove you from our distribution lists at [contact@nunuspirits.io](mailto:contact@nunuspirits.io)
  - 14.2.2. During the retention of personal data, we take technical and organizational security measures against accidental or intentional manipulation, partial or complete loss, destruction or unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.
- 14.3. Where provided by law, you, your successors, representatives and/or proxies may
    - 14.3.1. request deletion, correction or revision of your Personal data;
    - 14.3.2. oppose the data Processing;
    - 14.3.3. limit the use and Disclosure of your Personal data; and
    - 14.3.4. revoke Consent to any of our data Processing activities, if the Company is relying on your Consent and does not have another legal basis to continue Processing your data.
  - 14.4. These rights can be exercised by contacting us through our contact form or writing to us at [contact@nunuspirits.io](mailto:contact@nunuspirits.io), attaching a copy of your ID. If the request is submitted by a person other than you, without providing evidence that the request is legitimately made on your behalf, the request will be rejected.



- 14.5. The request is free of charge unless your request is unfounded or excessive (e.g., if you have already requested such Personal data multiple times in the last twelve months or if the request generates an extremely high workload). In such a case, the Company may charge you a reasonable request fee according to applicable laws.
- 14.6. The Company may refuse, restrict or defer the provision of Personal data where it has the right to do so, for example if fulfilling the request will adversely affect the rights and freedoms of others.

## **15. PORTABILITY OF YOUR DATA**

- 15.1. You also have the right to receive your Personal data, which you have provided to the Company with, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company.
- 15.2. This right can be exercised by contacting us through our contact form or writing to us at [contact@nunuspirits.io](mailto:contact@nunuspirits.io), attaching a copy of your ID. If the request is submitted by a person other than you, without providing evidence that the request is legitimately made on your behalf, the request will be rejected.
- 15.3. The request is free of charge unless your request is unfounded or excessive (e.g., if you have already requested such Personal data multiple times in the last twelve months or if the request generates an extremely high workload). In such a case, the Company may charge you a reasonable request fee according to applicable laws.
- 15.4. The Company may refuse, restrict or defer the provision of Personal data where it has the right to do so, for example if fulfilling the request will adversely affect the rights and freedoms of others.

## **16. PRIVACY BY DESIGN AND BY DEFAULT**

- 16.1. The Company will, both at the time of the determination of the means for Processing and at the time of the Processing itself, implement appropriate technical and organizational measures, such as pseudonymization, which are designed to implement data-protection principles, such as data minimization, in an effective manner and to integrate the necessary safeguards into the Processing in order to meet the requirements of the GDPR and protect your rights.

16.2. The Company will implement appropriate technical and organizational measures for ensuring that, by default, only Personal data which are necessary for each specific purpose of the Processing are processed. This obligation applies to the amount of your Personal data We collect, the extent of their Processing, the period of storage and their accessibility. These measures will ensure that by default your Personal data are not made accessible without your intervention to an indefinite number of third parties.

## **17. CONTACTING THE COMPANY AND COMPLAINTS**

17.1. The Company hopes to be able to answer any questions or concerns you have about your Personal data. You can get in touch with the Company at the postal address or email address given in section 18 hereafter.

17.2. If you have any question in relation to the processing of your personal data, please address all correspondence to the Nunu Spirits Data Protection Office at: [contact@nunuspirits.io](mailto:contact@nunuspirits.io)

17.3. If you currently receive marketing information from us which you would prefer not to receive in the future, please email us at: [contact@nunuspirits.io](mailto:contact@nunuspirits.io)

17.4. In relation to GDPR, the Company appoints its relevant departments , as its EU representative for the purposes of article 27 of the EU General Data Protection Regulation 2016/679, whose postal address is Business Centre Building A3, Dubai World Central, Dubai, United Arab Emirates and whose email address is [dataprotection@NunuSpirits.io](mailto:dataprotection@NunuSpirits.io)

17.5. You have the right to make a complaint if you feel your Personal data has been mishandled or if the Company has failed to meet your expectations. You are encouraged to contact the Company about any complaints or concerns, but you are entitled to complain directly to the relevant supervisory authority.

17.6. If you wish to contact us, please do so at the following address: Business Centre Building A3, Dubai World Central, Dubai, United Arab Emirates or at the following email address [contact@nunuspirits.io](mailto:contact@nunuspirits.io)

17.7. Finally, you also have the right to file a complaint with the supervisory authority, being i.e. the French EU Data Protection Authority. You can contact them as follows CNIL, Commission Nationale de l'Informatique et des Libertés, 3 Place de Fontenoy TSA 80715, 75334 PARIS CEDEX 07, France, Tél : +33 (0)1.53.73.22.22, Fax: +33 (0)1.53.73.22.00

**18. CHANGES TO THE PRIVACY NOTICE**

18.1. The Company may modify this Notice from time to time and will post the most current version on the Website. If a modification reduces your rights, a pop-up window will inform you immediately when you will browse our Website and you will have to accept the changes.

**19. DATA CONTROLLER**

19.1. Re affirming Clause 17 above in relation to contact points for all data inquiries. The data controller of the file is the data protection department accessible at [dataprotection@NunuSpirits.io](mailto:dataprotection@NunuSpirits.io).

**20. LINKS**

20.1. The Website may contain links which direct you to third party sites. The Company rejects any liability relating to the privacy policy in force on said third party sites, the collection and use of your Personal data by the latter and relating to the contents of said sites (whether the links are hypertext links or deep-links).

20.2. Furthermore, Data subjects acknowledge and agree that using our Website could imply downloading other applications. Under no circumstances the Company shall be liable for the utilization of these other applications, especially regarding the Data protection rules.

**21. JURISDICTION AND GOVERNING LAW**

21.1. This Notice and any questions relating thereto shall be governed by the laws of the United Arab Emirates (UAE), to the exclusion of any rules of conflict resulting from private international law.

21.2. In case of dispute, the Parties shall maintain the confidentiality of any proceedings, including but not limited to, any and all information gathered, prepared, and presented for purposes of the litigation or related to the dispute(s) therein.

21.3. Any dispute arising out of or in connection with this Agreement, including any question regarding its existence, validity, or termination, shall be referred to and finally resolved by arbitration under the LCIA Rules, which Rules are deemed to be incorporated by reference into this clause. The number of arbitrators shall be one. The seat, or legal place, of arbitration shall be London (UK). The language to be used in the arbitral proceedings shall be English.

**22. CONTACT**

- 22.1. To ask questions or make comments on this Notice or to make a complaint about our compliance with applicable privacy laws, please contact us through:
- 22.1.1. our email addresses: [contact@nunuspirits.io](mailto:contact@nunuspirits.io) ;  
[dataprotection@NunuSpirits.io](mailto:dataprotection@NunuSpirits.io)
- 22.1.2. Our postal address: Business Centre Building A3, Dubai World Central, Dubai, United Arab Emirates.
- 22.2. We will acknowledge and investigate any complaint pursuant to this Notice.

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