

## **Infrachain privacy notice**

Version last updated on 23 February 2022.

This data protection notice is addressed to all individuals (i.e. data subjects) having regular or punctual contacts with Infrachain in the course of its activities such as (without being exhaustive) its members, board members, suppliers, customers, speakers and invitees to events, whether or not prospective, while in the context of legal entities, such individuals being the representatives, employees, agents, officers or proxy holders (“you” or “your”)

### **1. Controller and contact details**

Processing of personal data relating to you as described below are made under the control of Infrachain a.s.b.l. (“Infrachain”, “we”, “us” or “our”), a not for profit association established under the laws of the Grand-Duchy of Luxembourg, with registered office at 5, rue Plaetis, L-2338 Luxembourg and registered with the Luxembourg Trade and Companies Register under number F11332.

For any enquiry you may have under this privacy notice, please email us at the contact details referred to in section 8.8 below.

### **2. Personal data processed**

The information we collect for the purposes set out hereunder in Section 3 includes mainly your contact details such as your first name, last name, profession, position, professional title, company, professional and/or personal phone number, address and email address curriculum vitae and any other relevant information you may provide us with such as information disclosed in emails (signature block, subject line and body), payment information (including bank account details) and photograph or video footage (in the context of events).

You provide directly to us most of the information we process about you, notably in the following situations:

- You apply for membership or sponsorship with Infrachain;
- You are one of the contact persons of one of our members, partners, customers or suppliers;
- You are a manager of or work for Infrachain (either as an employee or otherwise);
- You have contacted us or otherwise showed interest to interact with us;
- You have registered yourself to speak at, attend to or have attended one of our events;
- You have subscribed to receive our newsletters.

We do not request any sensitive personal data from you; neither do we wish to process such data.

Sensitive personal data are data relating to your racial or ethnic origin, political opinion, religious or philosophical convictions, trade union membership, health and sexual life, and genetic data.

Therefore, we request that you do not include such sensitive personal data about yourself or other persons in your communication and/or documents sent to us. Otherwise, we will consider that we have received the consent to use such personal data for the purposes of responding to your query.

### **3. Purposes and legal bases**

Infrachain processes personal data for the following purposes on the following legal bases:

<b>Purpose</b>	<b>Legal Bases</b>	<b>Data subjects concerned</b>
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Manage our relationship with you, including maintenance of our contact data base up to date	performance of contract or requested pre-contractual steps	members, board members, suppliers, customers, speakers and invitees
	legitimate interest	
Communicate in relation to our corporate object, including via transmission of publications, be it electronic or printed media, including press releases and social media	performance of contract or requested pre-contractual steps	members, board members, customers, speakers and invitees
	consent	
	legitimate interest	
Direct marketing material such as our newsletter (with opt-out faculty at any time)	consent (opt-in) in relation to our products and services and those of our service providers or commercial partners	members, prospective customers, speakers and invitees
	legitimate interest in relation to the same products and services previously provided by us	existing customers who have not opted-out
Organize events, including travel arrangements, accommodation and dietary restrictions management	performance of contract or requested pre-contractual steps	members, board members, suppliers, customers, speakers and invitees
	legitimate interest	
	consent (for the taking of photographs and videos during events)	members, prospective customers, speakers and invitees, board members
Governance of the association	performance of contract or requested pre-contractual steps	members, board members
Invoicing and bookkeeping	performance of contract or requested pre-contractual steps	members, board members, suppliers, customers, speakers and invitees
	compliance with legal obligations	
Enforcing legal rights/managing complaints	legitimate interest	members, board members, suppliers, customers, speakers and invitees

#### 4. Recipients of your personal data

We may share your personal data with the following recipients to the extent we deem such disclosure or transmission to be necessary or desirable for satisfying the aforementioned purposes:

##### 4.1 Administrative or business-related recipients (mainly located in Benelux)

- Legal, financial and business advisors;
- Participants to the Infrachain community, such as members (including blockchain host operators) and customers;
- Social media subscribers;
- Administrative, regulatory and judicial bodies (in Luxembourg or abroad as the case may be),
- Press / journalists;
- Event organizers, photographers, caterers and other service providers;
- Other relevant third parties.

## 4.2 IT service providers

Infrachain uses services from the following companies established in and outside of the EEA:

- Dropbox, Inc. as storage provider with servers in the USA and Europe;
- Eventbrite, Inc. a ticketing service provider with servers in the USA;
- GitLab as a storage and communication provider, which uses Google, Inc as a storage provider;
- Google, Inc as a storage provider;
- The Rocket Science Group LLC d/b/a MailChimp (“MailChimp”) as a marketing tool provider for administration and communication relations with servers in the USA;
- Strikingly Inc. as a hosting provider, which uses Amazon Web Services as a storage provider with servers in the USA and in Europe;
- Swapcard Corporation SAS (“Swapcard”) as a provider for content sharing and networking tools at events, which uses Amazon Web Services as storage provider with servers located in Ireland; and
- WPEngine Inc. as a hosting provider, which uses Amazon Web Services and Google Cloud Servers as a storage providers with servers located in Europe;
- Zoom Video Communications, Inc. as a conferencing tool provider with servers located in Europe.

However, these providers have their own privacy policy, which you can find at their respective web sites.

## 5. Duration of retention of your personal data

We will not keep your personal data for longer than the time necessary for satisfying the aforementioned purposes, subject to the legal periods of limitation and to the situations where applicable laws require or allow personal data to be retained for a certain period of time after the termination of a contractual relationship (such as the legal obligation to keep accounting documents for a period of 10 years). Without prejudice to the generality of the foregoing:

- (a) personal data processed for the purpose of administration and management of any contractual relationship with our members, suppliers, customers and sponsors will be kept for a period of 10 years after the termination of our contract with you;
- (b) personal data processed for the purpose of contacting you will be kept for 10 years after termination of contract or service provision;
- (c) invoices will be retained for a minimum period of 10 years after their issuance.

We may also keep and process your personal data about you after the termination of our contractual relationship for specific purposes such as the compliance with legal obligations or the establishment, exercise or defense of legal claims.

## 6. Direct marketing communications

For the purpose of organizing events or gatherings dedicated to blockchain topics and/or to promote Infrachain's activities, we may use your email address to send you direct marketing communications.

We have obtained your email address either directly from you or indirectly from business partners who may have their own contact databases (e.g. a marketing agency). Such business partner may therefore either act as a (joint) controller with Infrachain or as a processor acting on behalf of Infrachain.

## 7. Cookies

We use the following first-party cookies with a view to improving our website and services:

Name of cookie	Type of cookie/duration	Purpose
cookie_notice_accepted	30 days	Record the acceptance of the cookie banner

We use the following third-party cookies to collect analytics and statistics with a view to improving our website and services:

Name of cookie	Type of cookie/duration	Purpose
<i>Google Analytics</i>	Performance cookie (temporary)	
_ga	2 years	Used to distinguish users
_gid	24 hours	Used to distinguish users

As regards Google Analytics, we have opted for the anonymisation of the IP address of the users of this website. Therefore, cookies from Google Analytics do not collect identification information relating to you (other than part of the IP address used to connect to our website) but allow us to use your anonymous connection data for statistical purposes related to the pages visited. The information generated by the cookie about your use of our website (including your IP address) will be transmitted to and stored by Google on servers.

More information about Google Analytics and opt-out options:

<https://support.google.com/analytics/answer/6004245>

## 8. Rights granted to data subjects

Subject to the limits set out in the applicable data protection laws, and in particular in the General Data Protection Regulation 2016/679, you may benefit from the following rights.

### 8.1 Your right of access

You have the right to ask us confirmation as to whether or not personal data relating to you are being processed and, where that is the case, access to the personal data and relevant information in that regard.

### 8.2 Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

### 8.3 Your right to erasure

You have the right to ask us to erase your personal information. However, Infrachain can refuse to erase your personal data for instance if we have a legal obligation to keep such personal data.

#### **8.4 Your right to restriction of processing**

You have the right to ask us to restrict the processing of your information.

#### **8.5 Your right to object to processing**

You have the right to object to processing that we carry out based on the legitimate interest we pursue. However, we remain able to process your information if we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims

#### **8.6 Your right to data portability**

Where relevant, you have to right to request to receive personal data concerning you which you have provided to us on in a structured, commonly used, machine-readable format, and to transmit it to another controller

#### **8.7 No automated decision making**

You are hereby informed that no automated decision making or profiling is conducted. You will be informed of change in this regard.

#### **8.8 Your right to complain**

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us at info [AT] Infrachain [DOT] com and we will respond.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the competent data protection authority, in Luxembourg such authority being the CNPD (*Commission Nationale pour la Protection des Données*).

#### **8.9 Your right to withdraw your consent**

Where a processing relies on your consent, notably via “opt-in” mechanism, you can withdraw such consent at any time.

### **9. Links on our website**

Where we provide links to websites of other organizations, this privacy notice does not cover how that organization processes personal information. We encourage you to read the privacy notices on the other websites you visit.

In addition, linking to websites does not mean that we endorse the content of these websites.

### **10. Changes to this privacy notice**

Changes may occur in the way we process information about you. In case these changes oblige us to update this data protection notice, we will do our best efforts to bring this to your attention and may do so by any means such as by email, letter, hyperlink to our intranet or otherwise. The latest version will always be available here <https://infrachain.com/privacy>.