

DISEO Ecosystem Privacy Magna Carta

This Magna Carta was last modified / became effective on: March 20, 2021 / April 1, 2021

INTRODUCTION

This Ecosystem Privacy Magna Carta ("Policy") forms part of the 'Ecosystem General User Terms' ("General Terms") valid for all platforms and the "Platform Specific User Terms" ("Specific Terms") valid individually for each related platform of the DISEO Ecosystem operated by DISEO Ltd, Switzerland ("DISEO"). Each platform as a mobile app and associated website is provided by autonomous communities ("Providers"), where each of them has agreed to comply with present Policy. All platforms of all Providers are interconnected to a global ecosystem ("Ecosystem") to share the same user base and the same content pool while adhering to this Policy.

DISEO is fully committed to your privacy, that is why DISEO and its Platforms are designed around privacy protection and put you in full control of your data and how it is used.

DISEO enables you to communicate according your permissions directly with other users on the Platform where you initially registered and also with other users who are members of any other interconnected Platform.

DISEO will not allow anybody to personally interact with you without prior mutual approval – unless through a connection invite according to your permissions.

DISEO is a social media ecosystem on which you manage and operate one or multiple profiles under one digital identity. You define which information to provide in which profile and to whom on which Platform you want to make it available.

DISEO will ensure that you have full control of your data.

Our intention is to transform our Ecosystem into a global digital democracy where verified users receive voting rights to elect representatives to continue developing this Policy as well as the General Terms and vote about changes to be made. Feel free to contact the Provider or Us on how you can support us to make this happen. Until this has been implemented, we reserve the right to develop this Policy further by changes we apply from time to time that we consider as reasonable and valuable for the Ecosystem and the protection of its users. What we have in mind is to build with you a fair-trade universe of Social Commerce by autonomous interconnected communities securing the highest possible data protection and privacy control of its users: Distributed. Democratized. Ethical. Sustainable. We protect your data according to Swiss law. However, please note, we will fully cooperate with countries related to digital transactions and your behaviour to apply local law and local taxes when you reside or are located within the geographic border of such country.

Further information you find on the website of the Provider or on diseo.me.

If you have specific questions about these Terms, please contact us at privacy@diseo.me

WHAT INFORMATION DO YOU HAVE TO PROVIDE TO USE DISEO PLATFORMS?

There are three levels of access within the DISEO platform.

DISEO Basic Access - to access this level of service you will only need to choose a username and a password and provide us with an email address or mobile number to allow us to communicate with you about your account and to recover your password. Since other users do not wish to be contacted by users without a minimum of available information about them, we do not allow you to send connect invites with Basic Access.

DISEO Enhanced Access – to access this level of service you will need to also supply us with your name and address, phone number and email address, in addition to your age, gender and country of permanent residence, however you will not be a verified user of the service and you cannot receive a wallet. With this unverified level you can now invite other users to connect. Please note, some users will not allow you to connect as users have the option to exclude unverified users to send them connect invites.

DISEO Full Access – to access this level of service you will need to complete “Document Verification” of DISEO or the wallet provider by uploading and verifying a personal identification document, such as a passport or picture identity to meet the requirements of applicable anti-money laundering and similar legislation (Know Your Customer (KYC) Information). At this level you will be a verified user of DISEO and you will be able to add a wallet (if available in your country) and receive payment for data you choose to share. In addition, you gain additional control, i.e. higher impact on trust index, ability to hide profiles / content of unverified users.

Please note that your KYC data will be shared with the wallet partner and DISEO. Such wallet partner will be bound by confidentiality obligations and other restrictions about how they deal with your personal information. Each wallet partner has its own terms of service and price list which are available to you when choosing a specific wallet partner upon ‘Document Verification’.

We will also collect and process the following information:

- Financial Information – in connection with your wallet activities
- Details of our interactions with you and any identifiers we assign to you
- Details of your interactions with other users to identify valuable recommendation for you
- Information about your exploring of content of the Ecosystem to detect your preferences

All information that we collect about you, we collect for your personal convenience and to create personal value. Such information remains in your exclusive ownership and we will make them available to you such that you can manage them and decide which information to keep and which information to delete.

Whenever information shall be shared with third party it will happen under your control and with your full consent.

Note that, if you share your personal information directly with any third party, and not with DISEO then the third party’s privacy policy, and not this Policy, will govern that third party’s dealings with your personal information. You accept that DISEO will not be responsible for that third party’s compliance with its privacy policy or privacy laws.

PERSONAL DATA COLLECTED THROUGH THE DIESEO ECOSYSTEM

Personal data is information about an identifiable, natural person.

When using DIESEO we collect certain data that is necessary for us to provide the service. This includes the following:

- The internal ID of the device used
- The type and version of the operating system
- The time of access
- The address of your DIESEO wallet

This data is collected and processed in order to enable the smooth operation of the platform, to improve the performance of the platform and for internal statistical purposes.

It is within the legitimate interest of DIESEO to process this personal data.

If we have attacks on our network infrastructure or other unauthorised or abusive use of any of our platforms, we may also evaluate the Internal ID of your device and the address of your DIESEO wallet. If necessary, we may use this within the framework of criminal proceedings for identification and potential legal action against the users concerned.

We will also collect the following personal data when you sign up to any app of the Ecosystem and depending of your level of access to the Ecosystem (explained in the previous section):

- E-mail address used for sign up
- Age
- Gender
- Nationality
- Permanent Residence address
- A scan of info needed for verification such as passport/ ID card or driving licence
- Other information that you provide in your profiles

This info is necessary and solely used in order for us to offer you the service. It is also necessary for us to stay in touch with you. We will not sell this information and we will store it securely. We may use your email address to send you special offers and information about our products and services.

We will also collect and process the following information which will be related to your account.

- Financial information in connection with your holdings in the DIESEO wallet
- Details of our interactions and records on our communications with you
- Identifiers we assign to you

We use this mandatory information to authenticate you when you log in and to ensure security of your account. We therefore need to ensure that we have information which identifies you, your account and your holdings.

We will also collect your personal data for the following purposes:

- To update and enhance our services
- As a basis for your activity index
- To undertake research, analytics and benchmarking, including to measure the number of users on any of our platforms or services
- To identify and understand our users' needs
- For internal record keeping, audit and compliance purposes

We will take all reasonable steps to keep your personal information safe from loss, unauthorised activity or misuse in any way. If there is a security incident, we have procedures in place to investigate the incident and determine if there has been a data breach which involves personal information. If such a breach requires notification, we will notify all affected parties in accordance with the applicable requirements in the territory in which the user is based.

Any personal information about you that DISEO holds or controls will be erased as soon as it is no longer necessary to achieve the Purpose(s) for which it was collected unless we are required by applicable law to store it for a longer period of time, in which case it will be erased after the relevant time period has elapsed.

OTHER DATA WE COLLECT THROUGH THE DISEO ECOSYSTEM

Other generic and non-personal data, which is not directly about an identifiable, natural person, which we may collect.

- IP address of the device
- Operating system used, browser, search engine used,
- Country & language settings
- Domain name of the Internet Service Provider (ISP)
- Pages you visit on or from links on the platform
- Content viewed on the platform, or from links on the platform
- Time spent on the platform

This is the information over which you as the user will have full control in terms of how much you will allow us to process and pass this information to third parties. Depending on the level of access you grant DISEO, we will be able to tailor targeted advertisements to you and if you are an enhanced access user, you will be able to receive payments directly to your wallet based on the advertising revenue that may accrue as a result of sharing this info.

You will always have the ability to enter, change and manage the data that is created from your user habits and how much of it can be shared with third parties. You will be able to grant or refuse use of this data at any time by using the icon on the home page of the platform.

COOKIES

To optimise the DISEO platform, we may share your generic and non-personal data with third party analytic companies or allow third parties to access that generic data or to use tracking technologies like "cookies" to collect statistical information about our users. The information collected is anonymous (it will not contain any personal information which could identify you).

However, you will have the ability to opt out by disabling cookies in the app or by using your browser or mobile settings.

Any third-party provider that we engage with will be bound by confidentiality obligations and other restrictions with respect to their use and collection of such collected information.

WHAT ARE COOKIES?

Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user's device. For more information on DISEO's use of cookies and your options you can also find more information about cookies at www.allaboutcookies.org and www.youronlinechoices.eu;

Cookies do many different jobs, such as allowing you to navigate between pages efficiently, remembering your preferences, and generally improving the user experience. They can also help to verify the advertisements and other content you see online are more relevant to you and your interests;

Some of these cookies are provided by third parties. For example, we use Google analytics cookies to allow us to analyse statistics on the numbers of visitors to our websites and how users interact with different features on the websites. We also use cookies to construct visitor interest models and assess user habits. These cookies are also used to show you relevant advertising.

WHAT IF I DON'T WANT COOKIES?

By using DISEO 's website you agree we can place cookies and other similar technologies on your device as explained above. If you want to remove existing cookies from your device, you can do this using your browser options. If you want to block future cookies being placed on your device, you can change your browser settings to do this.

For more information on managing cookies, see www.allaboutcookies.org/manage-cookies or www.youronlinechoices.com/;

HOW DOES DISEO RESPOND TO "DO NOT TRACK" SIGNALS?

Current "Do Not Track" initiatives are not recognized by our website. DISEO is not responsible for the content or privacy practices of other non-DISEO websites to which DISEO' websites may link. If you are asked to provide information on one of these sites, we urge you to carefully review their privacy policies before sharing.

MANAGING YOUR PREFERENCES

You may opt-out of receiving communications about DISEO products and services visiting our subscription preference centre at any time.

For other valuable consumer information, including information on protecting yourself from identity theft and fraud, visit the following sites:

- United States: www.consumer.gov

- Australia: www.oaic.gov.au
- Canada: www.priv.gc.ca/index_e.asp
- Hong Kong: www.pcpd.org.hk/
- Korea: www.pipc.go.kr/
- Europe: <http://ec.europa.eu/justice/data-protection/>
- Japan: www.ppc.go.jp/en/
- United Kingdom: <https://ico.org.uk/for-the-public/>
- Ireland: <https://www.dataprotection.ie/docs/Home/4.htm>

TRANSFER AND STORAGE OF DATA

DISEO aims to store all data in Switzerland or in countries of the European Union, however it may also be necessary to transfer and store data in other jurisdictions. If DISEO transfers your data to another jurisdiction outside of the EU, it will aim to store that data in jurisdictions which have concluded a data adequacy agreement with the European Union. If DISEO ever transfers to or stores data in a jurisdiction which has not concluded a data adequacy agreement with the EU, DISEO will require any company which is storing data in such a jurisdiction to sign a contract with DISEO which includes a Model Contract Clause. This clause will ensure that the appropriate safeguards are taken that will meet the equivalent standards on data protection as those provided by the EU's General Data Protection Regulation (GDPR)

HELP KEEP YOUR INFORMATION SAFE

Please take care when deciding what personal information you send to us via email. No internet or email transmission is ever fully secure or error free. In particular, email sent to or from the services may not be secure so if you provide us with personal information over the internet, the provision of that information is at your own risk.

When accessing the DISEO website, look for the 'padlock' symbol in your web browser. The 'padlock' symbol is a certificate of authenticity and ensures the site is secure.

Secure Socket Layer (SSL) is the most accepted way of ensuring the security of transmitted information to and from internet sites worldwide. It operates in all pages of our website.

WHICH LAW DO WE APPLY? AND WHERE DOES THE LAW APPLY?

This Policy and the contracts concluded on the basis of or in connection with this Policy are subject to Swiss law, unless the law of another country is mandatory. The place of jurisdiction shall be Zug, Switzerland, unless another place of jurisdiction is mandatory.

YOUR RIGHT TO ACCESS YOUR PERSONAL INFORMATION

You may request access to any of the personal information we hold about you at any time. We may charge you a small fee for this service. To request access to the personal information that we hold about you, please contact us at privacy@diseo.me.

We will respond to your request within a reasonable period of time and, where reasonable and practicable, grant access to the information in the manner requested. An explanation will be provided to you if we deny you access to your personal information we hold.

You have the right to request that DISEO erase your personal data, under certain conditions. You have the right to request that DISEO transfer the data we have collected about you to another organization, or directly to you, under certain conditions.

If any information we hold about you is incorrect, please contact us at privacy@diseo.me

HOW TO CONTACT US

If you have any queries about this Policy, please feel free to contact us at privacy@diseo.me

PRIVACY LAWS STILL APPLY

This Policy does not limit our rights and obligations under applicable privacy laws, including the GDPR for EU users.