

NEPT METaverse | Privacy Policy

Effective Date: 15th April 2022

INTRODUCTION

1. This Privacy Policy is a part of the Terms of Use and describes personal data collection and processing executed by Nept Limited, a company incorporated as per the laws and regulations of British Virgin Islands with the company number 2094868 ("company", "we", "us" or "our"), in particular this policy is to ensure that the Company collect, store and disclose information of the users ("you" or "your") of the websites, web applications and web portals ("websites") connected to the Company's Nept token and other NFT projects in compliance with the requirements defined by British Virgin Islands' Data Protection Act, 2021.
2. This Policy is to help you understand which data is being collected from you and how that data is used, all that to help you effectively manage your personal data.
3. You acknowledge and agree with the data collection requirements essential to the provisions of our services, you also confirm that you are informed about required disclosures of your data for the development, regulatory, financial and marketing purposes. By subscribing to our newsletters and promotional emails you give us your consent to process your data for marketing purposes, you may withdraw your consent at any time by emailing us at compliance@neptmetaverse.com.
4. Your relations with the company and usage of the products and services developed by the company are regulated by our websites' Terms of Use and this Privacy Policy. Data processing on our websites is regulated by this Privacy Policy only.
5. We may use services and products issued by 3rd parties. These linked services and products may use their own tools and procedures to collect, process and store your data and more importantly is that every 3rd party service is regulated by its own Privacy Policy. Please bear in mind that it is your responsibility to carefully read such terms and conditions which govern processing of your personal data.
6. We are absolutely committed to the safety and integrity of your personal data and privacy. Our process and controls ensure compliance are designed to comply with the British Virgin Island's applicable data protection laws.
7. Our data protection team may be approached by an email at compliance@neptmetaverse.com.
8. Any major update of this Policy will be published on our website(s), please familiarise yourself with updated versions in a timely manner.

COOKIES WARNING

9. Cookies or pixel tags are small data files, they are placed and stored on your hard drive or in device memory. Cookies and pixels might be used by us, or by 3rd parties. Consenting with this policy you are not consenting with the cookies and pixels created by 3rd parties.
10. You may change settings of your browser to reject cookies and pixels, as well as you may reject cookies and pixels in the cookie banner on the website.

11. You accept and agree that if you do choose to remove or reject cookies or pixels, some options and features might become unavailable.
12. The website currently uses Google Analytics cookies, which may be subject to change in the future, in which case this Privacy Policy shall be updated accordingly.

THE DATA WE COLLECT

13. We narrow our data collection to an absolute minimum, the goal of this data collection process is to enhance your enjoyment and experience on our websites. We do not keep the data indefinitely and dispose of it as soon as we no longer require it.
14. Non-personally identifiable data such as web-browser type, language preferences, referring website, plugins used, time and date you are visiting our site, time spent on the website.
15. Potentially personally identifiable data such as your IP connection, name, email address, your wallet addresses and other applicable KYC details.
16. We also collect potentially personally identifiable data via our social media: Telegram and Discord channels or in case you engage in communication with us via our socials or emails, we may record your chats and email exchanges with us.
17. We are obligated to collect and disclose your sensitive data if you are purchasing tokens worth over 10,000 USD then that makes us comply with the AML regulations.
18. Public blockchains provide transparency into transactions and the company is not responsible for information broadcasted on a blockchain. Your blockchain public address can be collected, and we would like to highlight that transactions that take place using blockchain are confirmed and managed via the blockchain, and public address is visible to everyone.
19. Your login credentials and your communication in our websites are potentially personally-identifying information which we collect and store.

WHAT DO WE DO WITH DATA

20. Your information may be used to:
 - 20.1. communicate with you
 - 20.2. personalize your experience
 - 20.3. to improve the website and the nept metaverse platform
21. We do not use the IP data to identify you and we only disclose your personal information if we absolutely must do so, for example if we are requested by the authorities.
22. We may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.
23. We may disclose information to the third party service providers for the purpose of enabling them to provide their services, for example, IT service providers, data storage, hosting and server providers, advertisers, or analytics platforms, our existing or potential agents or business partners, sponsors or promoters of any competition, sweepstakes, or promotion we run.
24. The Company allows access to potentially personally-identifying information on need to know basis only to those of project administrators, employees, contractors, and affiliated organizations who are essential to the provision of our services and this data sharing is protected by the NDA (non-disclosure agreements) required to gain access to the sensitive information held by the company.

25. Some of those administrators, employees, contractors, and affiliated organizations might be located outside of your country, by using the website and our services you agree to with the data transfer over your borders.
26. In case you supplied to us your email and consent we might send you emails to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with our Nept Metaverse project, you are allowed to not consent with such newsletter emails and able to opt-out of them any time by primary written notice.
27. You acknowledge that your requests or suggestions or feedback sent to us might be published by us.
28. The company is not going to rent or sell potentially personally-identifying and personally-identifying information to anyone.
29. We may disclose personal information to enforce this policy or the Terms of Use in courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise, or defend our legal rights.
30. If the company is reorganised or restructured your data may be disclosed to a parent, subsidiary, or affiliate of our company;
31. Personal data collected from the residents and citizens of the European Union will not be transferred outside of the EU without proper due diligence and will be retained by us, if not in use, for 5 years maximum.
32. We implement measures reasonably necessary to protect us and your information against unauthorized access, use, alteration, or destruction.

YOUR DATA MANAGEMENT RIGHTS

33. You have certain rights under the British Virgin Islands' Data Protection Act in relation to the personal information we hold about you. In particular, you have a right to:
 - 33.1. ask if we process any personal data about you and/or request a copy of personal information we hold about you;
 - 33.2. ask that we update the personal information we hold about you, or independently correct such personal information that you think is incorrect or incomplete;
 - 33.3. ask that we delete personal information that we hold about you from live systems, or restrict the way in which we use such personal information;
 - 33.4. ask that we restrict processing of your personal data or object to our processing of your personal information;
 - 33.5. ask for the data portability; and/or withdraw your consent to our processing of your personal information (to the extent such processing is based on consent and consent is the only permissible basis for processing).
34. If you would like to request access to your account data or exercise your rights in regards to information we hold, please send us an email to compliance@neptmetaverse.com.

MINORS

35. Protecting the privacy of young children is especially important. For that reason, we or our websites do not knowingly collect or maintain personally identifiable information from persons under 18 years-of-age. If we learn that personally-identifiable information of persons less than 18 years-of-age has been collected on or through our websites,

then we will take the appropriate steps to delete this information. If you are the parent or legal guardian of a child under 18 who has become a user of our websites, then please contact us at compliance@neptmetaverse.com to have that child's account terminated and information deleted.

THIRD PARTIES LINKS

36. Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices, you have to acknowledge third parties Terms of Services and Privacy Policies to use them.

LEGAL GROUNDS

37. We rely on one or more of the following processing conditions:
- 37.1. our legitimate interests in the effective delivery of information and services to you;
 - 37.2. explicit consent that you have given;
 - 37.3. legal obligations;
 - 37.4. fulfilling an agreement (contractual relationship) with you.

UPDATES AND CHANGES

38. At our discretion, we may change our privacy policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this privacy policy, we will post the changes here at the same link by which you are accessing this privacy policy.

39. CONTACT

For any questions or concerns regarding your privacy, you may contact us using the following details:

Attention: Privacy and Compliance Officer, Nept Metaverse

Correspondence Address: Unit D, 10/F., 8 Hart Avenue, No.8-10 Hart Avenue, T.S.T. Kowloon, Hong Kong

40. Email ID: compliance@neptmetaverse.com