# Website Privacy Notice

The privacy of users of the website is paramount for the Tezos Foundation, Baarerstrasse 22, 6300 Zug, Switzerland (“we” or “us”). We greatly appreciate the trust that you have placed in us and will do our best to protect your personal data.

We will process your personal data in accordance with the Swiss Federal Act on Data Protection (“FADP”) and the European Union (“EU”) General Data Protection Regulation (“GDPR”), which is considered by many as the world’s strictest data protection regime.

Personal data is any information that relates to an identifiable natural person and includes inter alia name, address, e-mail address and user behaviour. The collection, use and disclosure (“processing”) of your personal data by us or any third-party recipient at all times will be in accordance with the terms of this Privacy Note.

## Our commitment to data protection principles

We are responsible for the processing of your personal data (as a “data controller” pursuant to the GDPR / FADP). In order to protect your personal data in connection with the usage of the website, we are committed to adhering to the GDPR/FADP principles **outlined below**. All individuals working for us are required to follow these principles in their daily activities.

We will therefore make sure that your personal data is:

* processed lawfully, fairly and in a transparent manner (lawfulness, fairness and transparency);
* collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (purpose limitation);
* adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed (data minimisation);
* accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that your personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay (accuracy);
* kept in a form which permits your identification for no longer than is necessary for the purposes for which personal data is processed (storage limitation); and
* processed in a manner that ensures appropriate security of your personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical or organisational measures (integrity and confidentiality).

The controller of your personal data is the Tezos Foundation. If you have any question, you can reach out to support@tezos.com.

## Disclosure and transfer of your personal data

We will not share any of your personal data with any government authorities, except in order to comply with legal or regulatory requirements. If we receive a request to disclose your personal data to a government authority, we will thoroughly assess the request and will in particular consider possible legal challenges against such request. We will only comply with any such request that is binding, enforceable and issued in full compliance with applicable law.

We may transfer your personal data to third-party service providers and partners located outside of Switzerland and the European Economic Area (EEA), including to the United States. Where such transfers occur, we ensure a similar degree of protection by implementing at least one of the following safeguards:

* Adequacy Decisions: We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
* Legal Basis and Safeguards: If the country to which we transfer your personal data does not have an adequacy decision, we will ensure that there is a legal basis for the transfer and, if required, implement appropriate safeguards to ensure your data is protected.
* Standard Contractual Clauses: Where we use service providers outside Switzerland and/or EEA, we may use specific contracts approved for use in these regions, which give your personal data the same protection it has Switzerland and/or EEA.

## Collecting of personal data

If you merely use this website for informational purposes, we will only collect your personal data that is transferred by your browser to our server. We collect online properties, identification data, professional life data, personal life data, connection data and localization data (including IP addresses), which is technically necessary for us to show you our website and ensure security and stability. The data collected is not linked to or stored with any personal data.

We evaluate the IP addresses together with other data, in case of attacks on our infrastructure or where unauthorized or abusive use of our website is suspected, for the purpose of intelligence and protection, and if appropriate, used in criminal proceedings for identification and civil and criminal proceedings against the relevant users. This is our legitimate interest in the processing of data in the sense of the relevant laws.

Our website provider is Blokhaus Inc, who uses Amazon Web Services as a hosting provider, Cloudflare as content distribution network and Google Inc. as analytics provider. The transfer of data is for the purpose of providing and maintaining the functionality of our website.

We may also obtain personal data about you from third-party sources, including public registers, business partners, and affiliates. This data may include professional details, online publicly available information, or transaction-related information where permitted by law.

Providing personal data is voluntary. However, if you choose not to provide certain data that is necessary for specific services (e.g., newsletter subscriptions, etc.), we may not be able to provide those services to you.

## Collecting of personal data when signing up for the Newsletter

When signing up for the Newsletter on our website, you need to enter your email address.

You must enter the email address voluntarily, in order for us to be able to contact. Therefore, the processing of this data is in our legitimate interest in accordance in the sense of the relevant laws.

## Cookies - Use of Google Analytics

We also use Google Analytics to help us understand how our customers use our site. You can read more about how Google uses your personal information here: [Google Privacy Policy](https://www.google.com/intl/en/policies/privacy/). You can also opt-out of Google Analytics here: [Google Analytics Opt-Out](https://tools.google.com/dlpage/gaoptout).

For further details, please refer to our separate Cookie Policy.

## Securing your data

We have implemented various technical and organizational security measures to ensure that your personal data is adequately protected from unauthorized access or other unlawful use. We use CloudFlare Inc. to secure and ensure reliability of our website.

We have contractual arrangements with all of our IT and other third party service providers in place, which require them to also implement the necessary security measures.

Our commitment to security also means that we have imposed strict confidentiality obligations on all of our staff and that we have implemented various data security policies to protect your personal data.

## Data retention

We will retain your personal data only for as long as necessary to fulfill the purposes for which we collected it, including to comply with legal, regulatory, tax, accounting, or reporting requirements. In certain circumstances, we may retain your data for a longer period, for example, if required by law or to resolve disputes. When determining the appropriate retention period, we consider factors such as the nature of the data, the potential risk of harm from unauthorized use or disclosure, and our legal obligations. Once retention is no longer necessary, we securely delete or anonymize your data.

## Your rights in connection with your data

As a data subject, you have the following rights under applicable data protection laws::

* to request access to your personal data, including to obtain a copy of such data;
* to request correction of inaccurate personal data or to have incomplete personal data completed;
* to request the erasure of your personal data;
* to restrict or object to the processing of your data under certain conditions;
* to withdraw consent at any time, where processing is based on consent, but this will not affect the lawfulness of the processing until the revocation;to request data portability where the data is processed on the basis of your consent or the necessity for the performance of a contract concluded with you; and
* to lodge a complaint with the relevant data protection authority. In Switzerland, this is the Federal Data Protection and Information Commissioner (FDPIC). If you are located in the European Economic Area (EEA), you can contact your local data protection authority.

## CHANGES TO THIS PRIVACY POLICY

We keep this Privacy Policy under regular review and may update it from time to time. We reserve the right to make amendments to our Privacy Policy at any time. Any changes we may make to this Privacy Policy will be posted on our website.

Unless otherwise provided in this Privacy Policy, it is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Contact

If you would like to exercise your rights listed under point 8 above or if you have any request regarding our use of your personal data you may contact us by emailing support@tezos.com or by letter to:

Tezos Foundation

Attention: Data Protection

Baarerstrasse 22

6300 Zug

Switzerland

If you are an individual in the EU, you can also contact VeraSafe, which has been appointed as Tezos Foundation’s representative in the EU pursuant to Article 27 GDPR, only on matters related to the processing of personal data. To make such an inquiry, please contact VeraSafe using this contact form:https://www.verasafe.com/privacy-services/contact-article-27-representative.

Alternatively, VeraSafe may be contacted at:

Matthew Joseph

Zahradníčkova 1220/20A

Prague 15000

Czech Republic

or

VeraSafe Ireland Ltd.

Unit 3D North Point House

North Point Business Park

New Mallow Road

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