

Integral Privacy Policy

Last revised on: August 16, 2021

This Privacy Policy applies to all information we collect from you (your “**Personal Data**”) through our Website and App. The Integral Terms of Service (“**Terms**”) are incorporated by reference into this Privacy Policy, and all capitalized terms (unless defined in this document) are defined in our Terms available at <https://integral.link/terms>.

If you have any questions or concerns about how we use your Personal Data, please email us at info@integral.link.

1. WHAT PERSONAL DATA DO WE COLLECT?

We collect Personal Data from you when you use our website, sign up for our newsletter via Substack, or contact us through Zendesk. We receive Personal Data from analytic providers, Google Analytics and LuckyOrange, and our Know-Your-Customer provider, Blockpass. We may also collect Personal Data about you from public blockchain scanners like etherscan.io. The Personal Data we receive and collect from you may include:

- Name, address, email, date of birth
- Passport information including first and last name, gender, issuing country, nationality, passport number, expiry date
- Ethereum Public Wallet Address
- Email Address
- Cookies, web tracking, and analytics.

2. HOW DO WE USE YOUR PERSONAL DATA?

We use your Personal Data for the following business purposes:

- **Identity Verification.** We may use your Personal Data to verify your identity.
- **Enforce our Terms.** We may use your Personal Data to assist with enforcement of our Terms, this Privacy Policy, and other agreements.
- **Communicate with you.** We use your Personal Data provide customer support, respond to your questions, and send you our newsletter.
- **Respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the information we hold to determine how to respond.
- **Analytics.** When you browse or use our website, we utilize commonly-used logging and analytics tools such as Google Analytics to collect information about your device, the network used to access the website, site traffic, and information about your use of the website (such as how you navigate and move around the website).

3. WITH WHOM WILL WE SHARE YOUR PERSONAL DATA?

We only share and disclose your Personal Data with the following third parties:

- **Purchasers of Our Business.** We may share your Personal Data in connection with any merger or acquisition of our business to another company.

- **Law Enforcement.** We may share your Personal Data in order to comply, as necessary, with applicable laws and regulatory requirements.

4. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will only keep your PII for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process PII, we will either delete or anonymize it, or, if this is not possible (for example, because the PII has been stored in backup archives), then we will securely store the PII and isolate it from any further processing until deletion is possible.

5. HOW DO WE KEEP YOUR PERSONAL DATA SAFE?

We ensure that our systems are secure and that they meet industry standards. We seek to protect your Personal Data by implementing physical and electronic safeguards. Any service provider we engage with will have similar security and confidentiality policies. We will do our best to protect the security of your Personal Data but as you know, no security system is completely secure.

6. DO WE COLLECT PERSONAL DATA FROM MINORS?

You must be at least 18 years old to use the App. We do not knowingly collect Personal Data from persons under 13 years of age. If we learn that we have collected Personal Data about a person under the age of 13 years of age, we will deactivate the account and delete such data from our records. If you become aware of any information we have collected from a person under the age of 13, please email us at info@integral.link.

7. USE OF GOOGLE ANALYTICS

We use Google Analytics. The following link explains how Google uses data when you use its partners' websites and applications: www.google.com/policies/privacy/partners/. Your use of our website is evidence of your consent to us storing and accessing cookies and other information on your computer or phone and our use of Google Analytics in connection with such activities. Please read the information at the link provided so you understand what you are consenting to.

Please note that blocking, deleting, or restricting cookies may negatively affect the performance or certain functionality of the website. If you would like to opt out of Google Analytics, and certain Google advertising functionality, you may do so using Google's opt-out tool.

8. CONTROLS FOR DO-NOT-TRACK FEATURES

We do not currently respond to "Do Not Track" or DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

9. PRIVACY RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION ("GDPR")

If you are a resident of the European Economic Area ("EEA") or Switzerland ("EEA Residents"), you can make the following requests at any time by emailing info@integral.link.

- **Opt-Out.** You may request that we stop sending you direct marketing communications which you have previously consented to receive. We may continue to send you service-related and other non-marketing communications.
- **Access.** You may request we provide you with information about our processing of your Personal Data and give you access to your Personal Data.
- **Rectify.** You may request we update or correct inaccuracies in your Personal Data.
- **Erase.** You may request we erase your Personal Data.
- **Export.** You may request we transfer a machine-readable copy of your Personal Data to you or a third party of your choice.
- **Restrict.** You may request we restrict the processing of your Personal Data at any time. For example, you may request that we stop storing your email.
- **Object.** You may object to our processing of your Personal Data at any time. We have provided you with the ability to unsubscribe if you do not wish to receive newsletters or marketing emails from us anymore.

Note that we may refuse to grant your requests in whole or in part as permitted by the GDPR. You have the right to complain to a data protection authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority or [click here](#).

9.1 Our basis for processing your Personal Data

The GDPR prohibits us from processing or using your Personal Data unless certain conditions apply. These conditions are known as “legal basis” and we will usually rely on one of the following legal bases when processing your Personal Data:

- **Contract.** We use your Personal Data because you have entered into a contract with us and have accepted our Terms.
- **Legitimate Interest.** We use your Personal Data because we have a legitimate interest in doing so. For example, we need to use your Personal Data to communicate with you as necessary to provide the App and to improve our services.
- **Consent.** We use your Personal Data because you have given your consent to us to use your Personal Data for specific purposes. You can revoke your consent at any time.

9.2 International Transfers of Personal Data

We recognize and acknowledge current data protection laws in the European Union, the United States, and around the world. We will store and process your Personal Data in Singapore. If you use the App from outside Singapore, you acknowledge we will transfer your Personal Data to, and store your Personal Data in Singapore, which may have different data protection rules than in your country, and Personal Data may become accessible as permitted by law in Singapore, including to law enforcement and/or national security authorities in Singapore.

10. CHANGES TO OUR PRIVACY POLICY

We reserve the right to make changes to this Privacy Policy. If we make material changes to our Privacy Policy, our revised Privacy Policy will be posted at <https://integral.link/privacy>, and it will either be noted on our App that material changes have been made or we will notify our users by email. The date of the most recent update to our Privacy Policy will be set forth in the header to the Privacy Policy.

11. HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?

If you have questions or concerns about our Privacy Policy practices, you may email us at info@integral.link.