



Provineer

PRIVACY AND COOKIE POLICY

Version 3:
14 November 2023

1. INTRODUCTION

As creatives who interact with multiple digital platforms to create, sell and share our work on a daily basis we understand how important content privacy, data storage and its protection is for our users. This firsthand experience has informed our Privacy Policy (PP) which is focused on the security and user accessibility of any content or data uploaded and interacted with on Provineer. As we develop and deploy new features throughout the evolution of the Platform we will make it our first priority that user content remains safe, accessible and secure.

With that said, in order for Provineer to provide and improve the Service as described we need to process some personal data. By using any of Provineer, the Platform or Services and/or registering an account you agree to have read and understood our Privacy Policy Statement as listed below.

2. YOUR DATA

Provineer needs to process some of your personal data in order for the Service to work as it is intended to. Personal data that is collected is data or information that describes you, the user, and linkable to you as a person. Examples of personal data that are collected as part of the Service include: your email address, user name, IP address and timestamp related to your geographic location. We collect this data to give you, the user, the ability to verify a claim of ownership over your content in order to save, authenticate, and protect your work on the Platform. The inability of Provineer to collect this data will render your claim of ownership over work or content uploaded by you onto the Platform or Service ineffective.

Alongside this mission critical reason, we will also process some of your personal data to: evaluate how you use the Service in order to make it more accessible, safe and secure; manage user subscriptions, optimise tier-bound features, and take payments; contact users regarding changes to how we process data in the future; communicate changes to the Platform, Service, TOS and/or PP; or directly communicate any issues relating to a users personal account or content on the Platform.

Outside the above stated reasons, we will not sell or share your data with anyone or any third party, and will only process your personal data for legal purposes if we are required to by legal authorities.

2.1 Personal Data Processing

A list of purposes in which Provineer will your process personal data:

- A. Operation of the Platform, Service and/or Website;
- B. User requested technical support;
- C. In response to legal requests relating but not limited to: fraud, abuse, user misrepresentation and / or IP theft;
- D. To defend Provineer, the Platform and / or the Service in legal proceedings as the result of or in relation your use of the platform; to comply with court orders, laws, regulation or governmental requests; to cooperate with third party fraud investigations, to cooperate with law enforcement, matter of national security, public security, public health, defence, and to uphold our Terms;
- E. To assess the effectiveness of our website and services and gather statistical insights. However, we will only use your data in a pseudonymized format, which means it cannot be linked back to you directly. For instance, instead of using your email address, we will use a random string of characters.
- F. When you indicate to us; we enable you to participate in actions, promotions, or events that we offer. After receiving your consent, we will communicate with you to keep you informed about news, features, actions, or promotions that we believe would be of interest to you. You can opt-out of these messages from us at any time.

Each processing activity has a valid legal basis, which we have described below.

1. A + B is necessary to perform the contract, which includes the services we offer through Provineer and the Platform on the web, through our mobile and desktop apps, and our Terms of Service.
2. C + D is necessary for processing activities to comply with our legal obligations. For example, we may need to search or share some of your personal data in the case of a violation or in the event that we need to uphold our TOS
3. E is necessary for the analysis of user behaviour based on legitimate interest. The ability to look at and analyse user behaviour is directly related to how effectively we are able to protect and grow Provineer through providing you with valuable new features and services.
4. F is necessary for getting in touch with you once you have given your consent for us to.

2.2 Starter Tier Service

A list of purposes in which Provineer will your process personal data regarding access to the Starter Tier:

- A. Operation of the Platform, Service and/or Website;
- B. User requested technical support;
- C. In response to legal requests relating but not limited to: fraud, abuse, user misrepresentation and / or IP theft;
- D. To defend Provineer, the Platform and / or the Service in legal proceedings as the result of or in relation your use of the platform; to comply with court orders, laws, regulation or governmental requests; to cooperate with third party fraud investigations, to cooperate with law enforcement, matter of national security, public security, public health, defence, and to uphold our Terms;
- E. To assess the effectiveness of our website and services and gather statistical insights. However, we will only use your data in a pseudonymized format, which means it cannot be linked back to you directly. For instance, instead of using your email address, we will use a random string of characters.
- F. When you indicate to us; we enable you to participate in actions, promotions, or events that we offer. After receiving your consent, we will communicate with you to keep you informed about news, features, actions, or promotions that we believe would be of interest to you. You can opt-out of these messages from us at any time.
- G. Creating and maintaining your personal account and dashboard, recording the use of your allotted uploads and storage and communicating with you about updates and new features
- H. When indicated by you: to enable you to engage in actions, events or promotions on offer.

Each processing activity has a valid legal basis, which we have described below.

1. A + B is necessary to perform the contract, which includes the services we offer through Provineer and the Platform on the web, through our mobile and desktop apps, and our Terms of Service.
2. C + D is necessary for processing activities to comply with our legal obligations. For example, we may need to search or share some of your personal data in the case of a violation or in the event that we need to uphold our TOS
3. E is necessary for the analysis of user behaviour based on legitimate interest. The ability to look at and analyse user behaviour is directly related to how effectively we are able to protect and grow Provineer through providing you with valuable new features and services.
4. F is necessary for getting in touch with you once you have given your consent for us to.
5. G is necessary for performance of the contract and the legal basis for creating and maintaining your personal account and giving you access to your subscription features.
6. H is necessary to reach out to you once you have given your consent for us to and refers to the legal basis for sending you any email that isn't a service-related one.

2.3 Premium Tier Service

A list of purposes in which Provineer will your process personal data regarding access to the Premium Tiers (Creator, Professional and Entrepreneur):

- A. Operation of the Platform, Service and/or Website;
- B. User requested technical support;
- C. In response to legal requests relating but not limited to: fraud, abuse, user misrepresentation and / or IP theft;
- D. To defend Provineer, the Platform and / or the Service in legal proceedings as the result of or in relation your use of the platform; to comply with court orders, laws, regulation or governmental requests; to cooperate with third party fraud investigations, to cooperate with law enforcement, matter of national security, public security, public health, defence, and to uphold our Terms;
- E. To assess the effectiveness of our website and services and gather statistical insights. However, we will only use your data in a pseudonymized format, which means it cannot be linked back to you directly. For instance, instead of using your email address, we will use a random string of characters.
- F. When you indicate to us; we enable you to participate in actions, promotions, or events that we offer. After receiving your consent, we will communicate with you to keep you informed about news, features, actions, or promotions that we believe would be of interest to you. You can opt-out of these messages from us at any time.

- G. Creating and maintaining your personal account and dashboard, facilitating payments and recording the use of your allotted uploads and storage and communicating with you about updates and new features
- H. When indicated by you: to enable you to engage in actions, events or promotions on offer.

Each processing activity has a valid legal basis, which we have described below.

1. A + B is necessary to perform the contract, which includes the services we offer through Provineer and the Platform on the web, through our mobile and desktop apps, and our Terms of Service.
2. C + D is necessary for processing activities to comply with our legal obligations. For example, we may need to search or share some of your personal data in the case of a violation or in the event that we need to uphold our TOS
3. E is necessary for the analysis of user behaviour based on legitimate interest. The ability to look at and analyse user behaviour is directly related to how effectively we are able to protect and grow Provineer through providing you with valuable new features and services.
4. G is necessary for performance of the contract and the legal basis for creating and maintaining your personal account, giving you access to your subscription features and enabling a payment option.
5. H is necessary to reach out to you once you have given your consent for us to and refers to the legal basis for sending you any email that isn't a service-related one.

Provineer does not sell, share or otherwise distribute your personal data to any third parties. We will not use your personal data for any other purposes than stated above without your prior consent.

3. DATA WE PROCESS

In order to provide a valuable, secure and efficient service to our users, Provineer needs to store specific personal data relating to the access of the website and the Service. On both the Starter and Premium tiers we use cookies to make your Provineer experience as smooth as possible, process some personal data to create and register your account for you and keep your data encrypted in our database.

For our Premium tier, we additionally use your data to process your payment and to give you seamless access to all the tools and features available within these tiers. Our payment processor stores your payment data. For tax purposes, we need to store your subscription details for 7 years. Once we do not need the data for this purpose anymore, we delete it. Your uploaded Content is kept as long as your Starter and / or Premium tier account is active. Changing from one tier to another will not affect your uploaded Content.

In order to update the Service, we analyse user behaviour but we anonymise no longer relevant data, or data that is at least 3 years old, after analysis.

If you opt into communications with Provineer we will keep you updated on actions / promotions.

3.1 Starter Tier

Processed personal data of Starter tier users:

1. IP address
2. Email address
3. File names, sizes and types
4. Descriptions and categories of uploads
5. Country and language settings
6. Browser type and version
7. Operating System

When you register for a Provineer Starter tier account you have to provide some personal data which will form the basis of your profile page. We register you in accordance with our Terms of Service and process (personal) data via the use of cookies.

When using the Service your work uploaded is stored on our servers and within a Provineer wallet for as long as your Provineer account is active. You, the user, are responsible for the legitimacy and accuracy of the upload and must abide by the Terms of Service. Provineer only processes your upload to make the content available for you via your dashboard as well as securing your claim of ownership via the process laid out in the Terms of Service section 3.3 The Service.

In order to maintain our service, fix technical issues and contact you, Provineer keeps the personal data that accompanies a user account for as long as the user account is active. This data is only accessible to a small group of people within Provineer and only to those whose access to it is crucial to the performance of their job, with an example being technical support of troubleshooting. When data from an inactive account is older than 12 months, we delete it from the database, or pseudonymise it.

3.2 Premium Tier

Processed personal data of Premium tier users:

1. IP address
2. Email address
3. File names, sizes and types
4. Descriptions and categories of uploads

5. Country and language settings
6. Browser type and version
7. Operating System
8. Your preferred payment method. While Provineer processes only the payment data and/or details needed to create an invoice for you, our payment intermediary will ask you to provide payment data.

When you register for a Provineer Premium tier account you have to provide some personal data which will form the basis of your profile page. We register you in accordance with our Terms of Service and process (personal) data via the use of cookies.

When using the Service your work uploaded is stored on our servers and / or a Provineer blockchain wallet for as long as your Provineer account is active. You, the user, are responsible for the legitimacy and accuracy of the upload and must abide by the Terms of Service. Provineer only processes your upload to make the content available for you via your dashboard as well as securing your claim of ownership via the process laid out in the Terms of Service section 3.3 The Service.

In order to maintain our service, fix technical issues and contact you, Provineer keeps the personal data that accompanies a user account for as long as the user account is active. This data is only accessible to a small group of people within Provineer and only to those whose access to it is crucial to the performance of their job, with an example being technical support of troubleshooting. When data from an inactive account is older than 12 months, we delete it from the database, or pseudonymise it.

For tax purposes, Provineer needs to store your subscription details after your Premium Tier account expires as proof of payment for a minimum of 7 years, after which we do not need the data for this purpose anymore, and delete it from our systems.

4. YOUR CONTENT

As creatives, we understand that while you are working through an idea, design or work you may not be ready to share it with the world. That's why we don't let any user search for anything not related to their own account on the website. Any idea, design or work uploaded to Provineer stays within your dashboard and ready to be shared once you are happy to. Provineer does not provide any search function, listing or catalogue listing to find uploads or proof that would be available, except if you are accessing your own account to ensure that you can locate your own Provineer work

Provineer does not proactively monitor the content of a user's uploads, profile page or dashboard and cannot edit or change work successfully uploaded to Flow blockchain via the Service. However, if Provineer receives a notice that content is unlawful or constitutes possible intellectual property infringement, Provineer is legally obliged to investigate and

delete content found in clear violation, following a specific investigative procedure as outlined in our Terms of Service document 6.3 Intellectual Property Disputes and Takedown Policy.

We urge caution when sharing any links or work via Provineer as anything not password protected via the Service may be accessed by a third party.

5. COOKIES

For the purpose of facilitating your use of the service and to find out how the service may be improved, Provineer places several cookies on your computer. These are small text files that are stored on your computer by your browser when you visit a website which help to save your preferences to make your Provineer experience as smooth as possible. Examples of cookie use include: saving your language preferences, logging into your specified tier account, remembering email addresses or frequently used Content titles and acceptance of the Terms of Service and Privacy & Cookie Policy.

Below you will find a list of cookies and their purposes:

1. **Function Cookies:** These cookies are used to improve the functionality and overall user experience of Provineer by remembering preference, categories and frequently used Content titles.
2. **Analytic Cookies:** These cookies are used to optimise the Service, to help our developers understand how you use the service, conduct AB testing of new features, and to make the entire service more user friendly. We also use these cookies to stop bots, malicious attacks and spam. Our analytic cookies could also include third party cookies which process personal data.

As we continue to develop and improve Provineer, we will create function and analytic cookies to be used with our Platform and will produce a cookie list to document each cookie. This list will be updated 4 times a year, but due to the evolving nature of our service this may result in the cookie list not being completely up to date at all times.

If you would like to block or remove Provineer cookies you can do so in your browser, in the Privacy tab of your Preferences section in most browsers. Please note, if you decide to remove or block cookies from Provineer the website or Service may function sub optimally.

6. SERVICE PARTNERS

In order to successfully operate and provide Provineer, the Service, to its users, we work with a number of partners who we may need to share personal information with from time to time in order for them to provide a service to you. These service partners categories include:

1. Email processor
2. File Server
3. Payment processor
4. Blockchain partner
5. Blockchain wallet
6. Decentralised storage providers
7. Analytics tools

Unless otherwise specified, these third party partners have no control over or right to use the personal information we share with them beyond what is necessary in assisting the Service operationally. Tasks of these third party companies and individuals include database and storage management, blockchain transactions, blockchain asset storage, payment processing, analytics and general improvements of the service.

When we cooperate with these third party providers and they process your personal data on our behalf, we make sure your personal data is handled with the same privacy and security we do. If you request more information regarding these partners, please contact us at legal@provineer.com.

7. SAFETY

Provineer is committed to making sure your personal information and Content are safe, that's why our servers and blockchain infrastructure is located with the UK and USA. All Content uploaded to UK servers will stay on UK servers, while transfers uploaded outside of the UK may be stored on either UK or US servers.

We safeguard your data internally by making sure it is only accessible by properly trained and authorised employees who need access to it to do their job. We limit the amount of people that have access to your data and we make sure all personal data can only be read, copied, modified or removed by properly trained and authorised staff. We monitor all internal activity as it pertains to the handling of your personal data in order to ensure the safety and accuracy of it.

All data provided by UK residents (determined from the client IP address) stays in the UK. If a user uses our service from a location in the UK, all personal data and the upload executed by the user will be done on our UK servers. If the Service is accessed outside of the UK, your upload and Content could be stored in the US or in the UK. Regardless of location, all metadata attached to uploads (including IP addresses and email addresses) is stored in a UK located database.

All servers we use to store your Content are GDPR compliant.

Data relevant to securing a user's claim of Content ownership on Provineer will be recorded as an NFT transaction on the Flow Blockchain Mainnet, regardless of geographical location. To ensure user privacy and safety, a minimal amount of data will be needed to link the Provineer user account with the Flow Blockchain transaction. We will review this process on a monthly basis to ensure that privacy is maintained and increased without detriment to the users or the Service.

8. USER DATA RIGHTS

If you would like more information regarding your personal data please get in touch. To facilitate this request we may ask for proof of identity. If you decide you no longer wish for us to process your personal data or request for us to correct or delete your personal data from Provineer please email us at legal@provineer.com. Please state that your request concerns a privacy matter within the subject line of the email and specify whether it is a request to access, correct or delete your personal data. To be clear, we may request additional information to determine your identity.

As a user, you have a right to object to the processing of your personal data. If you contact us to state that you no longer wish us to process your personal data or to be approached, Provineer will move your information to a separate file. Your data will no longer be used for the above mentioned purposes. You can request this via legal@provineer.com. Please state that your request concerns a privacy matter within the subject line of the email and that you are exercising your right to object in the email body.

9. PRIVACY AND COOKIE POLICY REVISIONS

As Provineer grows we will sometimes need to change our policy. To keep up to date with our most recent policy please refer back to this page now and then. If you find that the changes to our policy are no longer to your liking you can stop using the service at any time.

If you do not agree with the Privacy & Cookie Policy, you should not or no longer access or use the website and/or service.

By continuing to use the website, Platform and/or Service you accept any changes made to the Privacy & Cookie Policy.

If you have any questions, please email us in English. If you have questions about the way Provineer processes or stores your personal data or personal information please contact Provineer by sending an email with your question to legal@provineer.com. We are English speakers.

