

## Second Kin Developer Program Privacy Policy

This is the privacy policy (“**Privacy Policy**”) that governs how we, Kin Foundation (“**Kin**”, “**we**”, “**our**” or “**us**”), use Personal Information (defined below) that we collect, receive and store about individuals in connection with second Kin Developer Program found at: <https://developers.kinecosystem.com> (“**Program**”). “**you**” is the developer which wishes to submit your application to the Program and become a participant therein (“**Participant**”).

We do not ourselves host any of the information you provide to us – all hosting is done by third party service providers that we engage. This means that data you provide us or that we collect from you (including any Personal Information, as defined below) – as further described in this Privacy Policy – is hosted with such third party service providers on servers that they own or control. Regardless of where such third party service providers are located (and some are located in the US), their servers may be located anywhere in the world (including the US). Your data may even be replicated across multiple servers located in multiple countries. Please be aware that you are consenting to your data being transferred to various third party service providers around the world (including the US).

1. **Introduction.** We have implemented this Privacy Policy because your privacy, and the privacy of other Participants, is important to us. This Privacy Policy explains our online information practices and the choices you can make about the way your Personal Information is collected and used in connection with the Program. “**Personal Information**” means any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a personal profile, an email address, a home or other physical address, or other contact information.
2. **Terms and Conditions of the Program.** This Privacy Policy forms part of the Program terms and conditions found at: <https://developers.kinecosystem.com/TOS2>.
3. **Consent and Modification.** You are not legally obligated to provide us Personal Information, and you hereby confirm that providing us Personal Information is at your own free will. By entering into the Program, you consent to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Information for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not apply and participate in the Program. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective ten (10) days following posting of the revised Privacy Policy on <https://developers.kinecosystem.com/PP2> and your continued participation in the Program thereafter means that you accept those changes.
4. **What Personal Information We Collect and How We Collect It.** We receive and/or collect Personal Information from you in the following ways:
  - 4.1. **Online Application Form:** In order to enter into the Program, will need to complete and submit an online application form. You will be asked to provide us with certain mandatory information such as your name and email address, the name of your idea and app and the name of your company (if applicable).
  - 4.2. **‘Contact Us’ Information.** If you send us an email to an email address that we display, you may be required to provide us with certain information such as your name and email address.
5. **The Way We Use Personal Information.** If you submit or we collect Personal Information, then we may use such Personal Information in the following ways, via any applicable communication channel, including e-mail, SMS, etc.:
  - 5.1. We will use your Personal Information to contact you in connection with the Program and to identify and authenticate your access to the Program.
  - 5.2. We may use your designated email address to: (i) send you updates or news regarding the Program and our products; and/or (ii) respond to a “Contact Us”.
  - 5.3. We may transfer your Personal Information to our local or foreign subsidiaries or affiliated companies for the purpose of storing or processing such information on our behalf. Such information may be transferred to other countries. We require that these parties agree to process such information in compliance with our Privacy Policy.
  - 5.4. We may share your Personal Information with our third party service providers and partners, but only to assist us with our business operations and/or the administration of the Program. We use commercially reasonable efforts to only engage or interact with third party service providers and partners that post a privacy policy governing their processing of Personal Information.
  - 5.5. We may disclose your Personal Information or any information you submitted via the Program if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) detect, prevent, or otherwise address fraud or security issues; or (iii) protect against harm to the rights, property or safety of Kin, our users, yourself or the public.

6. **Use of Anonymous Information.** We may use Anonymous Information (as defined below) or disclose it to third party service providers in order to improve the Program or the Kin ecosystem. We may also disclose Anonymous Information (with or without compensation) to third parties, including advertisers and partners. “**Anonymous Information**” means information which does not enable identification of an individual user, such as aggregated information.
7. **Choice.** At all times, you may choose whether or not to provide or disclose Personal Information.
8. **Access/Accuracy.** To the extent that you do provide us with Personal Information, we wish to maintain accurate Personal Information. If you would like to delete or correct any of your Personal Information that we may be storing, you may submit an access request by sending an email to: [privacy@kinecosystem.com](mailto:privacy@kinecosystem.com). Your email should include adequate details of your request (for example: the name of the team or organization).
9. **Children’s Privacy.** The Program is not structured to attract children under the age of 18 years. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 18 years. If we learn that we have collected Personal Information from a child under 18 years, we will delete that information as quickly as possible. If you believe that we might have any such information, please contact us at: [privacy@kinecosystem.com](mailto:privacy@kinecosystem.com).
10. **Security.** The security of Personal Information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use reasonable acceptable means to protect your Personal Information, we cannot guarantee its absolute security or confidentiality. If you have any questions about security on the Program, you can contact us at: [privacy@kinecosystem.com](mailto:privacy@kinecosystem.com).
11. **Merger, Sale or Bankruptcy.** In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, or otherwise involved in a change of control, we reserve the right to transfer or assign Personal Information in connection with the foregoing events.
12. **Deletion of Content from California Residents.** If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal Information you have publicly posted. If you wish to remove such content or Personal Information and you specify which content or Personal Information you wish to be removed, we will do so in accordance with applicable law. To make such a request, please send an email to [privacy@kinecosystem.com](mailto:privacy@kinecosystem.com). Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.
13. **EU Participants’ Rights.** For EU citizens, you should know that Kin is a controller and a processor of your personal information. The legal bases for which we collect and use the information described above depends on what the information is and why we collected it. The four bases upon which we rely include:

**Contract.** This means we need the information to perform our contract with you. For example, when you apply for the Program, we use this information to ascertain eligibility and entry into the Program.

**Legitimate Interests.** This means we have a legitimate interest that does not outweigh your privacy rights. When we collect and process information based on our legitimate interests, we consider how we can accomplish what we need to in a way that is the least obtrusive on your privacy. For example, to troubleshoot technical issues in the application process; and to respond to your Program inquiries, we collect and use information in that request and, if relevant to the inquiry, information about how you access and use the Program.

**Legal Obligation.** We may need to use your Personal Information to comply with a law enforcement preservation request, subpoena, or other legal process or to protect the rights of other participants.

**Consent.** If we have no other legal basis for collecting or using your information, we will ask you for consent for a specific purpose. If we do, you have the right to withdraw consent at any time. Withdrawing your consent will not apply to any processing conducted in reliance on lawful processing bases other than consent.

In addition to other rights detailed in the policy (such as requesting deletion, correction or updating of your personal information), EU citizens have certain rights regarding Your Personal Information, including:

*Right to Object or Restrict Processing.* You have the right to object to or restrict our use of your Personal Information for direct marketing purposes or under certain circumstances when the legal bases for using your information is based upon our legitimate interest. If you wish to object to our use of your information, you can send a request to delete this information by clicking here.

*Right to Erasure.* You have the right to have your personal data erased and no longer processed. You can send us a

request to delete your application by clicking here. Upon receiving the request, we will make a reasonable effort to delete your Personal Information from our internal network within a reasonable period of time as long as we are not obligated to preserve your information due to things like law enforcement preservation requests, subpoenas, investigations, litigation, or otherwise meet any of our other legal obligations. We may also retain depersonalized information after deletion.

*Data Portability.* You can exercise your right to export your personal data by clicking here.

*File a Complaint.* You have the right to complain to the data protection authority located in your Member State. To find contact details, click here.

14. **Commitment.** We are committed to protecting your privacy. Protecting your privacy online is an evolving area, and we are constantly evolving our Program to meet these demands. If you have any comments or questions regarding our Privacy Policy, or your Personal Information that we may be storing and using, please contact us at [privacy@kinecosystem.com](mailto:privacy@kinecosystem.com).

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