# **Privacy Notice**

Last updated: 29.03.2025

#### Version: 1.01

This Privacy Notice ("**Notice**") describes how we collect and process your data through <u>https://gunzscan.io/</u> website (the "**Website**"). The terms "**Gunzscan**", "**we**", "**us**", "**our**" and "**ourselves**" refer to POSEIDON 133 PTE. LTD., a legal person registered under the laws of the Republic of Singapore.

We are committed to safeguarding the privacy of our users. We are not going to misuse your data.

#### Controller details:

POSEIDON 133 PTE. LTD.

UEN: 201502546D

Registered address: 39 Robinson Road #14-01 Robinson Point Singapore, 068911, Singapore

Contact email address: privacy@gunbygunz.com

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#### Information we process

#### Transaction Data

We collect and display publicly available blockchain transaction data, including but not limited to, wallet addresses, transaction amounts, timestamps, smart contract interactions. This data is retrieved from public blockchain networks and is not personally identifiable unless linked to additional information outside our platform. While blockchain transactions are public, we do not facilitate linking wallet addresses to real-world identities.

We may also process transaction details, token transfers, internal transactions, logs, state, raw trace data, and other relevant information. Transaction details may include, but are not limited to, the transaction ID, date and time of the transaction, amount, sender

and recipient wallet addresses, transaction status, gas fees, and confirmation status. This list may also encompass additional data related to transaction processing.

We use the collected data for the following purposes: displaying blockchain transactions and analytics, enhancing platform performance and security, and monitoring Website traffic and visitor behavior. We may also process this data to provide you with transaction history.

### Block Data

We process and display data related to network utilisation, block size, bytes, validator information, transaction details, gas used, rewards, burnt fees, base fees, and other relevant blockchain-related data. This list is not comprehensive and may include additional information required for block analysis.

This data is processed to record and track blockchain network performance and utilisation, to analyse block information for validation purposes, and to ensure accurate calculation and distribution of blockchain rewards and fees.

#### Token Data

We process and display information regarding the token name, symbol, price, on-chain market capitalisation, token holders, and other token-related data. This list may also include additional token-specific information necessary for delivering token services.

This data is processed to provide information on token performance, market trends, and tokenomics, enable you to track token ownership and associated data, and to display the market value and relevant financial metrics for each token.

#### Website Analytics

We analyse our Website in order to better understand your preferences and enhance your experience with us. When we do so, we may collect the following categories of your information:

- visitor activity on the Website (sessions, IP address);
- details of the devices used (screen size, device type, other details).

The purpose of collecting the above information is to optimise the Website's performance, enhance user experience, and improve the overall functionality of our services.

The processing of the above data for the Website analytics is based on several GDPR legal bases:

- legitimate interest (Art. 6.1(f) of the GDPR): The primary legal basis for processing this data is legitimate interest. Gunzscan has a legitimate interest in optimising the Website, improving services, and conducting marketing activities to enhance user engagement. This includes analysing user behaviour to make improvements, customise content, and provide a better user experience;
- consent (Art. 6.1(a) of the GDPR): In some cases, we may ask for your consent to use cookies to track your activity across our Website. Consent is obtained for

certain tracking mechanisms (e.g., cookies) that are used to analyse user behaviour.

# Cookies

A cookie is a small text file which may be placed onto your device when you access and use the Website. We use the term "cookies" to also include other tracking technologies having equivalent or similar effect, such as mobile device identifiers. We use cookies on our Website to help us recognise you and your device and store some information about your preferences or past actions. Cookies support the integrity of our registration process, retain your preferences and account settings, help evaluate and compile aggregated statistics about user activity and assist with our marketing efforts.

We may use cookies to:

- prevent fraud on our Website
- provide visitors with the relevant version of the Website;
- carry out research and statistical analysis to help improve our content, products and services and to help us better understand our users' requirements.

For further information on cookies generally, visit <u>www.aboutcookies.org</u> or <u>www.allaboutcookies.org</u>.

The cookies placed on your device may fall into the following categories by their purpose:

• **strictly necessary cookies** – these cookies are essential for the operation of the Website and for you to use its features. For example, we may use these cookies to ensure fraud prevention or help you log in to our Website and fill in forms more easily. We also use these types of cookies to ensure that our Website is displayed correctly on your device. Without these cookies, services you have asked for may not be provided;

• **preference cookies** – these cookies enable the Website to provide enhanced functionality and personalisation. If you do not allow these cookies, then some or all of these services may not function properly;

• **analytical/statistical cookies** – these cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Website. They help us to know which pages are the most and least popular and see how visitors move around the Website. If you do not allow these cookies, we will not know when you have visited our Website and will not be able to monitor its performance. All information collected by these cookies is only used to improve how our Website works;

• **marketing cookies** – these cookies are used to deliver adverts more relevant to you and your interests. They may be used to limit the number of times you see an advertisement and help measure the effectiveness of an advertising campaign. They are usually placed by advertising networks with the Website operator's permission, and the information collected may be used, for example, to provide measurement services or target ads.

#### Cookies that are used on our Website:

Cookies	Purpose	Туре	Duration
session	Maintaining user session, authorization, and preferences.	First-party cookie	Session (expires when the browser session ends)
locale	Saving the user's language preferences	First-party cookie	1 year
theme	Storing the user's theme preference (dark/light).	First-party cookie	Persistent (1 year)
_ga	Web analytics (Google Analytics), tracking user behavior.	First-party cookie	2 years
_gid	Identifying unique visitors for analytical purposes.	First-party cookie	24 hours

The easiest way to manage your cookie preferences on our website is through our cookie consent tool. You can access it anytime via the hovering button in the bottom-left corner of the website. The consent tool allows you to control the use of various types of cookies.

Strictly necessary cookies cannot be disabled, nor can the tool be used to block cookies on third-party websites linked from our Website. Unless you choose otherwise, we can store and process only those cookies that are necessary for the operation of our Website. If you don't want to be tracked by other types of cookies, you can refuse to give your initial consent or opt out later.

Alternatively, you can control the use of cookies on our Website using the settings of your browser. To disable cookies through your browser, look for the instructions usually located within the "Help", "Tools" or "Edit" menus in your browser. Please note that disabling a cookie or category of cookies does not delete the cookie from your browser unless manually completed through your browser function

## Sources of personal data

We obtain personal data from such sources:

- directly from the data subjects visitors of the Website;
- public blockchain.

# **Retention of your information**

Overall, we retain personal data processed through our Website for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable law.

We will store communication data for 2 years, unless you explicitly ask us to delete the information earlier. In this case, we undertake to remove your communication data from our active systems and servers and delete or anonymise it.

Analytics data (e.g., IP address, activity logs) of visitors on the Website is retained as per Google Analytics default settings.

However, we may need to retain some of your personal data for longer if there is a need for it, for example, in order to comply with our tax, accounting and legal requirements. In this case, the applied legal basis for the processing of your information will be the necessity to comply with a legal obligation.

Please note that certain personal data cannot be removed or deleted at all because of the nature of the blockchain. This concerns personal data, such as transaction details, token transfers, block data, token information, and related logs or trace data. The blockchain technology used in the provision of our services operates on a decentralised network, where transactions are recorded in an immutable and transparent manner. This characteristic ensures the integrity and security of the data stored on the blockchain. However, it also means that once data is added to the blockchain, it becomes virtually impossible to remove or delete it.

# Third-party access to information

Your personal information may be shared with the following categories of third parties:

- web analytics service providers;
- cloud hosting and storage service providers.

The categories of providers listed above process your information based on our instructions only. In case your personal data is provided to third parties outside the EEA, we will implement appropriate safeguards to protect your personal data, including Standard Contractual Clauses as adopted by the European Commission. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

#### Other disclosures

In addition to the disclosures for the purposes identified before, we may disclose information about you for the following purposes:

• **law enforcement, legal process and compliance:** if we are required to do so by law, in connection with any legal proceedings or to establish, exercise or defend our legal rights, or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a facially valid court order, judicial or other

government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies. We also reserve the right to disclose personal data or other information that we believe, in good faith, is appropriate or necessary to: (i) take precautions against liability; (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity; (iii) investigate and defend ourselves against any third-party claims or allegations; (iv) protect the security or integrity of our services and any facilities or equipment used to make our services available; or (v) protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others;

• change of ownership or other business needs: (i) in case we sell, licence or otherwise assign our company, corporate rights, the Website or its separate parts or features to third parties; (ii) as part of a transaction, financing, or for other business needs (e.g., if we need to disclose your personal data to the prospective lender or bank, investor or prospective investor, and/or their professional advisers as part of certain due diligence processes, as the case may be); (iii) we may also disclose and otherwise transfer your personal data to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the information commits to a privacy policy that has terms substantially consistent with this Notice.

# Your rights

Depending on your country of residence or in some regions, such as the European Economic Area (EEA), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.

## EU/EEA

In the EU/EEA, you have certain rights under applicable data protection laws, such as the Regulation (EU) 2016/679 General Data Protection Regulation (the "**GDPR**").

You may exercise GDPR rights regarding your personal data. In particular, you have the right to:

## • The right to access your information

You have the right to know what personal data we process. As such you can obtain the disclosure of the personal data involved in the processing and you can obtain a copy of the information undergoing processing.

### • The right to verify your information and seek its rectification

If you find that we process inaccurate or out-of-date information, you can verify the accuracy of your information and/or ask for it to be updated or corrected;

### • The right to have your personal data deleted

If we are not under the obligation to keep your personal data for legal compliance and it is not needed in the scope of an active contract or claim, we will remove your information upon your request.

### • The right to restrict the processing of your information

When you contest the accuracy of your information, believe we process it unlawfully or want to object to the processing, you have the right to temporarily stop the processing of your information to check if the processing was consistent. In this case, we will stop processing your personal data (other than storing it) until we are able to provide you with evidence of its lawful processing.

### • The right to have your personal data transferred to another organisation

Where we process your personal data on the legal basis of consent you provided us or on the necessity to perform a contract, we can make, at your request, your personal data available to you or to an organisation of your choosing.

#### • The right to object against the processing of your information

If we process your information for our legitimate interests (e.g., for direct marketing emails or for our marketing research purposes), you can object to it. Let us know what you object against and we will consider your request. If there are no compelling interests for us to refuse to perform your request, we will stop the processing for such purposes. If we believe our compelling interests outweigh your right to privacy, we will clarify this to you.

You can formulate such requests or channel further questions on data protection by contacting us directly at <u>privacy@gunbygunz.com</u>.

If you believe that our use of personal information violates your rights, or if you are dissatisfied with a response you received to a request you formulated to us, you have the right to lodge a complaint with the competent data protection authority of your choice.

## Security of information

We will take all necessary measures to protect your information from unauthorised or accidental access, destruction, modification, blocking, copying, and distribution, as well as from other illegal actions of third parties. As we use the services of third-party software providers across several countries outside of the European Union, we may transfer the collected information to those countries for further processing. In such cases, we will make sure that relevant safeguards are in place. More information on such safeguards can be provided upon request.

We also make sure that access to your information stored in our database is only possible via a secure and closed VPN connection. Additionally, all communications exposed to the internet are TLS encrypted to provide the highest level of communications security.

## Children's privacy

Our product does not address anyone under the age of 18. We do not knowingly collect personal information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers.

# **Changes to this Notice**

We may update this Notice from time to time by posting a new version on our Website. We advise you to check this page occasionally to ensure you are happy with any changes. However, we will endeavour to provide you with an announcement about any significant changes.