

Privacy Policy

Last Updated: 27 Mar 2025

Welcome to Entangle, an unincorporated organisation, as represented on the website at <https://entangle.fi> ("Entangle," "we," "us," or "our"). Along with our Terms of Use, this Privacy Policy (the "Policy") explains how we collect and handle your information across all of the services, including the website <https://entangle.fi> (together, the "Platforms"). We may collect, record, and use your personal data, and we will hold, use, and otherwise process that data in line with the Data Protection Legislation as set out in this document. This Privacy Policy applies across all Entangle products and services, including but not limited to the Universal Data Feeds (UDF), Universal Token Standard (UTS), and the Universal Interoperability Protocol (UIP).

I. What is personal data?

Personal data is any information relating to an identified or identifiable natural person (data subject), directly or indirectly, by reference to an identifier, such as a name, an identification number, location data or an online identifier. In other words, personal data is any information about you that enables your identification.

II. Your consent

By continuing to use our website, you consent to the processing of your personal data as described in this Policy. Your consent implies your knowledge and acceptance of the terms and conditions of this Policy.

III. We may process Your data because:

- You give it to us (for example, in a form on our website);
- Other people give it to us (for example, third-party service providers that we use to help operate our business);
- It is publicly available;
- It is collected automatically (through "Cookies" on the website).
- In accordance with Article 6 of the GDPR, our legal bases for processing your personal data include:
 - Consent (where you have given clear permission for processing);
 - Contractual necessity (where processing is required to perform a contract with You);
 - Legal obligation: We process personal data to comply with specific legal obligations, such as anti-money laundering regulations, tax reporting requirements, and cooperation with governmental or regulatory authorities;
 - Legitimate interests: Entangle processes personal data for legitimate business interests, including service improvement, fraud prevention, security enhancement, analytical insights, market research, direct marketing (where permitted by law), and the effective operation of our platforms and services.

IV. Information we collect

We gather various types of information to enhance your experience and provide our services efficiently. This includes:

- **Personal data You provide:** Details such as contact information, financial data, and other data you choose to share with us.
- **Legal and regulatory compliance data:** This may include passport or other identification data, date of birth, home address, and other due diligence data as required for purposes such as Know Your Client, anti-money laundering, or as part of our client onboarding process.
- **Automatically collected information:** When you interact with our Platforms, we automatically collect certain information such as IP address, device details, and usage patterns through cookies and similar technologies.
- **Categories of data subjects:** We may collect and process data from various categories of users, including:
 - Platform users: Individuals interacting directly with our website and blockchain services.
 - Clients and partners: Entities utilizing Entangle's services in contractual relationships.
 - Suppliers and vendors: Third parties providing services or products to Entangle.
 - Job applicants and contractors: Individuals who submit employment or collaboration-related information.
- **Unsolicited personal information:** If we receive unsolicited personal information (such as resumes or job applications not requested by Entangle), we will assess whether this information is necessary for our purposes. If deemed unnecessary, the information will be securely deleted or anonymized promptly.
- **Web3 identifiers and personal data:** When interacting with our blockchain-based services, your wallet addresses and on-chain activity are primary identifiers. Such data, while publicly visible, may constitute personal data depending on its association with other personal identifiers. Blockchain data, including wallet addresses, transaction histories, and associated metadata, is immutable and publicly accessible. Users should exercise caution when interacting with smart contracts as these actions result in permanent records that Entangle cannot alter or delete.
- **Decentralisation and data handling:** Entangle's products leverage decentralized technology. Data processing activities in a decentralized environment inherently differ from traditional centralized systems. Personal data stored on-chain is public and immutable. We encourage users to understand the decentralized nature of our platforms and carefully consider the data they share through public blockchain interactions.

V. How we use Your information

We utilise the information we collect for various purposes, including:

- **Service provision:** Delivering and improving our Services, and communicating with you regarding updates or inquiries.
- **Marketing and communications:** Sending you relevant information about our products, services, and promotions, where law permits.
- **Analytics and personalisation:** Understanding user preferences, analysing usage trends, and customising content to enhance your experience.
- **Compliance and security:** Ensuring compliance with legal obligations, investigating fraud or abuse, and maintaining the security of our Platforms.
- **Safety and security:** We utilise your information to maintain the safety, security, and integrity of our services, including detecting and preventing fraudulent activity, monitoring identity access, and enforcing agreements.
- **Other business purposes:** Personal data is also used for compliance, risk management, and general business operations such as audits, security measures, and fraud prevention.
- **Data minimization:** We adhere strictly to the principle of data minimization, collecting only the essential personal data necessary to deliver and improve our services. We store personal data no longer than necessary, after which we anonymize or permanently delete it to protect user privacy.
- **Data anonymization:** Entangle may anonymize personal data for statistical analysis, research, and IT system testing purposes, ensuring such data cannot be associated back to individuals.
- **Consequences of not providing data:** Certain personal data is necessary to provide specific services or fulfill contractual obligations. Failure to provide required data might limit or prevent access to certain features or services on our platform.

VI. More about Cookies

We collect information through cookies to enhance your browsing experience and to analyse website traffic. Cookies are small text files stored on your device when you visit our website. These cookies may include:

- **Session Cookies:** These temporary cookies are erased when you close your browser. We use session cookies to improve navigation on our website.
- **Persistent Cookies:** These cookies remain on your device for a more extended period and help us recognise you when you return to our website. We use persistent cookies to remember your preferences and settings.

A. How we use Cookies

We use Cookies for the following purposes:

- **Analytics:** We use cookies to analyse how visitors use our website, which helps us improve our content and user experience.
- **Functionality:** Cookies enable certain features and functionalities on our website, such as remembering your preferences.

B. Managing Cookies

- You can manage or delete cookies through your browser settings. However, please note that disabling cookies may affect your browsing experience on our website.

C. Cookie Consent Preferences.

- Upon your first visit to our website, a cookie banner will request your consent to use cookies. You can choose to accept all cookies, reject non-essential cookies, or customise your preferences. You can update your preferences at any time via our cookie settings panel on the website.

We respect your choices in accordance with GDPR and other applicable privacy regulations.

D. Third-Party Cookies

- We may also allow third-party service providers to use cookies on our website to collect information about your browsing activities. These third-party cookies are subject to the respective privacy policies of their providers.

VII. Third-Party Services

We may integrate third-party services or include links to other websites and applications to enhance your user experience. These services may collect data about your interactions with our website and services under their own privacy policies. We are not responsible for the practices of these third-party services. Please consult their privacy policies to learn about their data practices:

- Google Analytics (for website usage tracking): <https://support.google.com/analytics/answer/6004245?sjid=9374059794341826518-EU#zippy=%2Cour-privacy-policy> ; <https://policies.google.com/privacy?hl=en>
- Discord (for community engagement): <https://discord.com/privacy>
- Mailchimp (marketing platforms for email automation): <https://www.intuit.com/privacy/statement/>
- HubSpot (marketing platforms for email automation): https://legal.hubspot.com/privacy-policy?hubs_content=www.hubspot.com/&hubs_content-cta=Privacy%20Policy

VIII. Information Sharing

We may share your information with:

- Other entities within Entangle group to provide services to you.
- Service providers: Third-party vendors and service providers who assist us in delivering and improving our Services.
- These third-party service providers are only given access to the minimum data necessary to perform their functions and are obligated not to disclose or use it for other purposes.
- Business transfers: In the event of a merger, acquisition, or sale of assets, your information may be transferred to the acquiring entity.
- International data transfers: We may transfer your personal data internationally, potentially to countries outside your jurisdiction that may not offer equivalent data protection standards. Such transfers are safeguarded using mechanisms approved by applicable laws, specifically Standard Contractual Clauses (SCCs) as approved by the European Commission, to ensure comprehensive protection of your data.
- Law enforcement, regulatory, or government agencies request personal information in connection with any inquiry, subpoena, court order, or other legal or regulatory procedures we would need to comply with.

IX. Your rights

You have the right to exercise control over how your personal data is processed:

- **Right to be informed.** You are entitled to know how and why we process personal data. Therefore, we publish this Policy and are always ready to answer any of your questions.
- **Right of access.** You can ask us to confirm whether we are processing your personal data and request detailed information about how we collect, process, use, store, and share it.
- **Right to rectification.** We strive to maintain the integrity of the data we store and keep it up to date. Therefore, you can always ask us to clarify and correct outdated or inaccurate information.
- **Right to erasure.** You may request that your personal data be deleted. You may file a request by sending an e-mail to info@entangle.fi.
- **Restrict and object to processing.** You may restrict or object to the processing of your personal data.
- **Right to data portability.** You have the right to receive the personal information concerning you that you have provided to us in a structured, commonly used, and readable format and have the right to transmit that data to a third party in certain situations.

- **Right to withdraw consent.** If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.
- **Right to complain.** You may lodge a complaint if your rights have been violated.

Please note that there may be legal reasons for us not fulfilling your request.

X. Links to other websites

Our website may contain external links to third-party resources, such as the services of our partners. We cannot control how the third parties use your information for their purposes, so please review the Privacy Policies of these websites.

XI. Data security

We are committed to protecting your personal data. We take various security and organisational measures to ensure the safety of your data when you enter it on the site or otherwise provide it to us.

We employ industry-standard security measures to safeguard your personal information against unauthorised access, disclosure, or alteration.

XII. Children's Personal data

Our Services are not intended for individuals under the age of 18. If we become aware that we have collected personal information from a child without parental consent, we will take steps to remove that information promptly.

XIII. Updates to this Privacy Policy

We may revise this Privacy Policy periodically to reflect changes in our practices or legal requirements. We will notify you of any significant updates by posting the revised policy on our website.

XIV. Contact us

If you have any questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please get in touch with us at info@entangle.fi.

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