## **Data And Privacy Policy**

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#### 1. Introduction

This website is operated by EXTREMELY DISTRIBUTED TECHNOLOGIES SRL (named in this document "SELF XDSD" or "the website <u>https://self-xdsd.com</u>"), a company with limited liability organised and functioning according to the laws of Romania. The postal address of the company is: Alexandru Odobescu Street, nr. 5, bl. PB91, ap. 1; Oradea, Romania. The company is registered in the Romanian Trade Office with the id J5/197/2021, VAT Number RO43621869 and European ID ROONRC.J5/197/2021. You can contact us at +40753452976 or e-mail address <u>support@self-xdsd.com</u>.

This document explains what data we process from our users, why and how we process it, how long we store it and what are your rights when it comes to your personal information.

This policy applies to the <u>self-xdsd.com</u> website, including but not limited to any website (or the mobile version of the website in question), where this policy is made available.

#### 2. Definitions

Throughout this document, the following notions will have the following meanings:

COOKIE = This is a small text file, usually made up of letters and digits, which is downloaded on the device (computer, smartphone, tablet etc) of the user

when they access Self XDSD and is being used by the website to provide a better/faster/more relevant user experience.

ACCOUNT = The account of the user on Self XDSD is actually a reflection of their Github or GitLab account. The user uses their Github or GitLab account to authenticate with Self XDSD and Self XDSD will present them with all the relevant data from their Github/GitLab account, necessary in order to fulfil the functionalities of the Self XDSD website.

AGREEMENT = When we ask for your agreement we expect your full and clear approval, given out of your own free through a written or verbal text or action (e,g, accessing our website is an approval of this policy).

PERSONAL DATA = any information regarding an identified or potentially identifiable person; an identifiable person is a person who can be directly or indirectly identified, especially by using an identification element such as a name, a uniquely assigned number, location data, or personal elements such as physical or physiological details, social details, religious and philosophical details, sexual orientation etc.

GDPR Regulation = The Regulation 2016/679 of the European Parliament and Council, from the 27th of April 2016, about the protection of individuals, regarding the processing of personal data and the free circulation of this data and the canceling of Directive 95/46/CE.

Data Processor (Processor) = The company EXTREMELY DISTRIBUTED TECHNOLOGIES SRL (Self XDSD).

Data Processing = Any operation or operations upon a personal information or set of personal data, using automated or manual means, like collecting, registering, organising, structuring, storage, adaption or modification, extraction, reading, using, transmitting, sharing or publicising in any way, restriction, deletion or destruction.

Concerned Person = Any identified or identifiable individual whose data is processed by us, for example clients, potential clients, visitors of the Self XDSD website.

SPAM = Any undesired or unsolicited message received by an individual, usually on topics concerning marketing. Self XDSD dislikes SPAM just as you and will never send you any such messages.

#### 3. Who Is Processing Your Data?

The Data Processor is the company EXTREMELY DISTRIBUTED TECHNOLOGIES SRL, a company with limited liability organised and functioning according to the laws of Romania. The postal address of the company is: Alexandru Odobescu Street, nr. 5, bl. PB91, ap. 1; Oradea, Romania. The company is registered in the Romanian Trade Office with the id J5/197/2021, VAT Number RO43621869 and European ID ROONRC.J5/197/2021. You can contact us at +40753452976 or e-mail address support@self-xdsd.com.

### 4. What Is Your Position In This Policy?

According to the law, any individual who uses or interacts with the Self XDSD website in any way is considered a Concerned Person.

### 5. Why Are We Processing Your Personal Data?

Depending on which functionality of Self XDSD you are using, we will have to process the following categories of personal data:

- Identification data (for example your name, country and contact information such as your e-mail address);
- Account data in Self XDSD (username, name, currency etc);
- Invoice and transaction data (payments, sums of money, earnings etc);
- Internet connection details such as navigation and geolocation data;
- Data about your likes and taste;

Most of the personal data is collected directly by Self XDSD. However, you acknowledge and accept that some parts of this data might be collected by third parties (collaborators of Self XDSD). For example, your credit card information and most of the payments data is collected and stored by Stripe (<u>https://stripe.com</u>), our partner for processing payments.

When we ask for some of your information in order to offer you access to a functionality in Self XDSD, the required (mandatory) information will be marked with an asterisk. Please be aware that should you choose not to provide such information, we will not be able to provide the functionality in question.

We will only process your data when needed, in order to provide the good functioning of the service provided by Self XDSD. Depending on how you interact with our service, we will process your personal data with the following purposes (the list is an overview and non-exhaustive):

1. Owning a user account on Self XDSD	In order to authenticate in Self XDSD, a user needs to have an account on Github ( <u>https://github.com</u> ) or GitLab ( <u>https://gitlab.com</u> ). Most of the data visible in Self XDSD after authentication comes from Github/
	GitLab.
	We maintain 4 pieces of information from your Github/GitLab account: your name, username, e-mail address and the URL to your avatar image.
	We remove this data as soon as you terminat or remove your account.

2. Being a Project Owner	If you activate one of your repositories on Self XDSD, you become a Project Owner.
	We do not ask for any additional information unless you decide to use a <b>Real Wallet.</b>
	In this case, we will ask for information such as first and last name, address, zipcode, etc. This is collectively called <b>"Billing Information"</b> and it will appear on the invoices emitted by your contributors to you. This data is maintained in our systems until you decide to delete your project.
	When a project is deleted, all of its information, including billing info, contracts and invocies, are deleted.
	We also collect credit or debit card information, but this data is sent from your browser directly to Stripe.
	Self XDSD will never, in any way, directly handle your sensitive payment information like credit card details.

3. Being a Contributor	If a Project Owner decides to register a Contract for you in their Project, you become a Contributor to that Project.
	That is, you will work on tasks assigned to you by our chatbot PM and be paid for your work (if the Project uses a Real Wallet).
	When you become a Contributor, we will find out your hourly rate (registered in the Contract) and we will also ask for your Billing Information when you create a "Payout Method".
	Billing Information consists of first name, last name, address, zip code etc. and it will appear on the Invoices emitted by you to the Project.
	Your Billing Information will also appear on the invoices emitted by Self XDSD to you for the commission.
	You Billing Information will be deleted from our system as soon as you remove your Payout Method or your account. "Deleted" means that the <b>structured</b> <b>data</b> (e.g. database table row) will be deleted.
	However, your Billing Information will still be visible on the Invoices emitted by Self XDSD to you and these invoices have to be archived and kept for as long as <b>10 years</b> , according to the Romanian legislation.
4. Statistics and Marketing	We may collect navigation and geolocation data for statistics regarding user engagement and experience.
	We may also use this data for marketing purposes such as better ad targeting.
	Data will only be processed while you are visiting the website.

5. For Answering Support Requests	We may use the data mentioned above to answer to Support requests.
	Data will only be processed/maintained for the duration of servicing your request.

# 6. Legal Grounds For Data Processing

1. Owning a user account on Self XDSD	Processed data: username, name, e-mail address and avatar image URL. Legal Ground: "Establishing and/or executing a contract" - Art 6, (1), b) GDPR Regulation.
2. Being a Project Owner	<ul> <li>Processed data: username, name, e-mail address, avatar image URL, Billing Information.</li> <li>Legal Ground: "Establishing and/or executing a contract" - Art 6, (1), b) GDPR Regulation.</li> <li>Legal obligation: Art 6, (1), c) GDPR Regulation</li> <li>Legitimate Interests: Art 6, (1), f) GDPR Regulation</li> </ul>
3. Being a Contributor	<ul> <li>Processed data: username, name, e-mail address, avatar image URL, Billing Information.</li> <li>Legal Ground: "Establishing and/or executing a contract" - Art 6, (1), b) GDPR Regulation.</li> <li>Legal obligation: Art 6, (1), c) GDPR Regulation</li> <li>Legitimate Interests: Art 6, (1), f) GDPR Regulation</li> </ul>

4. Statistics and Marketing	Processed data: username, e-mail, IP Address, Location Legal Ground: Agreement - Art 6, (1) a) GDPR Regulations (only for direct marketing). Legitimate Interests - Art 6, (1), f) GDPR
5. For Answering Support Requests	Regulation Processed data: name, username, e-mail
	address, avatar image URL. Legal Ground:
	"Establishing and/or executing a contract" - Art 6, (1), b) GDPR Regulation.
	"Legal obligation" - Art. 6, (1), c) GDPR Regulation.

If you have any questions regarding the information presented in the tables above, please do not hesitate to write as an e-mail at <u>support@self-xdsd.com</u> and we will do our best to give you an answer in no more than 30 days.

#### 7. Transfers To Third Parties

As part of our activity, we may send certain personal data to third parties, collaborators and providers. These third parties have their own safety and security measures implemented in regards to storing and processing personal data.

Thus, we may send your data to the following parties:

- \* Government institutions;
- \* IT providers: security, communications or hosting providers;
- \* Marketing and Publicity providers or collaborators;
- \* Payments processors (e.g. Stripe);

We and our collaborators maintain our databases in the European Union, as per the Schrems II (C-3111/18) Decision of the European Union Court of Justice.

## 8. Your Rights Regarding Your Personal Data

According to the GDPR Regulation, you have the following rights with regards to your personal data:

\* The right to be informed about the processing of your personal data;

\* The right to access your own personal data;

- You can ask us to give you access to your personal data which we process.

- \* The right to rectify incorrect or incomplete personal data;
  - You can ask us to rectify your personal data which we have;
- \* The right to deletion ("right to be forgotten")

- If we have no other legal ground to maintain your data, you can ask us to delete it. We will do our best to respond to each such request in no more than 30 days.

- \* The right to restrict processing;
  - You can ask us to stop processing your personal data for a period of time;
- \* The right to move your personal data to another Data Processor;

- You can ask us to send the personal data which we have to another Data Processor;

- \* The right to oppose data processing;
- You may retract your agreement to the processing of your data at any time.
- \* The right to not be judged solely based on automated processing.
- \* The right to address a court of law in regards to your rights and interests;
- \* The right to formulate a complaint with an Authority;

The Authority in Romania:

The National Authority Of Personal Data Processing. Adress: B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, 010336; Bucuresti, Romania; tel. +40318059211 or +40318059212; fax +40318059220; e-mail: anspdcp@dataprotection.ro; www.dataprotection.ro.

In case you would like to exercise one of your rights described above, feel free to send us an e-mail at <u>support@self-xdsd.com</u>. We will do our best to respond to any such request in no more than 30 days.

Please remember that the GDPR rights are not absolute. There are certain situations where these rights do not apply. We will always thoroughly analyse any such request and act accordingly. Naturally, if your request is well-founded, we will honour your request.

We will do our best to answer any request related to personal data in no more than 30 days. The term may be prolonged depending on the number of requests or failing to identify you in a reasonable amount of time.

In the event of not being able to identify you and if you decide not to give us more necessary information (so we can identify you), we will not be obliged to fulfil your request. In certain situations, if we deem it necessary, we may ask for an official identification document (e.g. government-issued ID), so we can properly identify you.

Depending on the changes to the law in effect, technical advancements and other such events, we may revise the information presented in the current document. As such, please revisit this document periodically, so you are always up to date with the latest changes.