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# **PRIVACY POLICY**



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# **CLOVER CREW PRIVACY POLICY**

LAST UPDATED: SEPTEMBER 15, 2024

THESE PRIVACY POLICIES (“TERMS”) GOVERN YOUR ACCESS TO AND USE OF OUR DIGITAL PLATFORMS, INCLUDING OUW WEBSITE [WWW.CCTI.IO], AND RELATED SERVICES.

THIS PRIVACY POLICY IS INTEGRAL TO MEMEBET’S TERMS AND CONDITIONS (“TERMS”), AND DEFINITIONS USED HEREIN ALIGN WITH THOSE OUTLINED IN THE TERMS UNLESS SPECIFIED OTHERWISE WITHIN THIS DOCUMENT.

## **1. OVERVIEW**

THIS DOCUMENT DELINEATES THE METHODOLOGIES CLOVERCREW AND CLOVERCREW OPERATORS EMPLOY IN THE COLLECTION, UTILIZATION, PROCESSING, DISCLOSURE, SHARING, TRANSMISSION, AND SAFEGUARDING OF PERSONAL DATA ACQUIRED THROUGH CLOVERCREW AND ITS AFFILIATES. THE PRONOUNS "WE," "US," AND "OUR" REFER COLLECTIVELY TO CLOVERCREW AND CLOVERCREW OPERATORS. THE COLLECTION OF CERTAIN PERSONAL DATA FROM USERS IS NECESSITATED BY LEGAL OBLIGATIONS OR IS PERTINENT FOR SPECIFIED OBJECTIVES. FOR COMPREHENSIVE DETAILS ON COOKIES USAGE, REFER TO OUR COOKIES POLICY. YOUR ACCEPTANCE OF THE TERMS OUTLINED IN THIS PRIVACY POLICY IS PRESUMED UPON YOUR ACCESS TO THE CLOVERCREW WEBSITE, IRRESPECTIVE OF REGISTRATION OR LOGIN STATUS. WE COMMIT NOT TO UTILIZE PERSONAL INFORMATION BEYOND THE SCOPE OF THIS PRIVACY POLICY, COOKIES POLICY, OR TERMS WITHOUT PRIOR NOTIFICATION AND YOUR CONSENT. ADHERENCE TO THE GENERAL DATA PROTECTION REGULATION (GDPR) IS A CORNERSTONE OF THIS POLICY, AS WE CONFORM TO ITS DIRECTIVES REGARDING PERSONAL DATA HANDLING WITHIN THE EUROPEAN ECONOMIC AREA (EEA). DATA TRANSFER MECHANISMS INCLUDE STANDARD CONTRACTUAL CLAUSES, RELIANCE ON THE EUROPEAN COMMISSION'S ADEQUACY DECISIONS, AND



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OBTAINING CONSENT FOR TRANSFERS TO THIRD COUNTRIES AS NECESSITATED BY LAW.

## **2. DATA COLLECTION**

PERSONAL DATA WE GATHER MAY INCLUDE BUT IS NOT LIMITED TO:

(A) IDENTIFIABLE PERSONAL DETAILS (E.G., NAME, DATE OF BIRTH, PERSONAL ID NUMBERS);

(B) CONTACT DETAILS (E.G., ADDRESS, PHONE NUMBER, EMAIL ADDRESS, ETHEREUM WALLET ADDRESS);

(C) TECHNICAL DATA (E.G., IP ADDRESS FOR API ACCESS AND LOGIN RECORDS);

(D) WEBSITE INTERACTION STATISTICS.

## **3. METHODS OF PERSONAL DATA COLLECTION**

PERSONAL DATA MAY BE PROVIDED:

(A) UPON ENGAGEMENT WITH OUR SERVICES;

(B) DURING ACCOUNT CREATION;

(C) VIA CONTRACTUAL AGREEMENTS;

ADDITIONAL COLLECTION METHODS MAY INCLUDE COMMUNICATIONS VIA PHONE, EMAIL, IN-PERSON INTERACTIONS, THIRD-PARTY INFORMATION SOURCES (INCLUDING SOCIAL MEDIA PLATFORMS), AND OTHER SUPPORT CHANNELS.

## **4. ADDITIONAL DATA COLLECTION METHODS**

WE MAY COLLECT DATA THROUGH:

(A) IP ADDRESS MONITORING;

(B) COOKIE UTILIZATION FOR ENHANCING USER EXPERIENCE (DETAILED IN OUR COOKIE POLICY);

(C) FEEDBACK FORMS FOR USER COMMUNICATION;

(D) SITE TRACKING VIA THIRD-PARTY SERVICES FOR USAGE ANALYSIS.



## **5. USAGE OF PERSONAL DATA**

PERSONAL DATA MAY BE USED FOR:

- (A) SERVICE PROVISION AND ENHANCEMENT;
- (B) SAFETY MEASURES FOR CUSTOMERS;
- (C) INQUIRY AND CLAIM INVESTIGATIONS;
- (D) BUSINESS ANALYTICS, SYSTEM IMPROVEMENTS, AND CUSTOMER PREFERENCES IDENTIFICATION;
- (E) LEGAL AND REGULATORY COMPLIANCE;
- (F) OTHER RELATED PURPOSES.

## **6. DATA ACCESS AND MANAGEMENT**

USERS MAY HAVE RIGHTS TO ACCESS, DELETE, AMEND, OR RESTRICT THE PROCESSING OF THEIR PERSONAL DATA, SUBJECT TO LEGAL AND REGULATORY FRAMEWORKS. AUTHENTICITY OF SUCH REQUESTS WILL BE VERIFIED.

## **7. WITHDRAWAL OF CONSENT**

CONSENT WITHDRAWAL MAY IMPACT SERVICE PROVISION. PROMOTIONAL COMMUNICATIONS CAN BE OPTED OUT OF THROUGH ACCOUNT SETTINGS ADJUSTMENTS OR DIRECT CONTACT REQUESTS.

## **8. DATA DISCLOSURE**

PERSONAL DATA IS NOT TRADED OR SOLD. IT MAY BE DISCLOSED TO AUTHORIZE THIRD PARTIES FOR SERVICE FULFILLMENT, LEGAL COMPLIANCE, OR BUSINESS TRANSFERS. EFFORTS ARE MADE TO ENSURE THIRD-PARTY COMPLIANCE WITH THIS PRIVACY STATEMENT.

## **9. DATA RETENTION AND SECURITY**

DATA IS RETAINED AS NECESSARY FOR THE PURPOSES OUTLINED, WITH INACTIVE DATA SCHEDULED FOR DELETION AFTER 24 MONTHS. DESPITE RIGOROUS SECURITY MEASURES, ABSOLUTE



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SECURITY CANNOT BE GUARANTEED. USERS ARE ENCOURAGED TO TAKE ADDITIONAL SAFETY PRECAUTIONS.

## **10. THIRD PARTY LINKS**

THIS POLICY DOES NOT EXTEND TO THIRD-PARTY WEBSITES LINKED FROM OUR PLATFORM. USER DISCRETION IS ADVISED WHEN PROVIDING PERSONAL INFORMATION ON SUCH SITES.

## **11. POLICY AMENDMENTS AND CONTACT INFORMATION**

THIS PRIVACY POLICY MAY BE UPDATED TO REFLECT LEGAL AND REGULATORY CHANGES. QUERIES OR CONCERNS REGARDING OUR PRIVACY POLICY OR PERSONAL DATA HANDLING CAN BE DIRECTED TO [SUPPORT@CCTO.IO](mailto:SUPPORT@CCTO.IO)



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