

# Holo Ltd Privacy Policy

We are delighted that you have chosen to visit our website. We take our data protection responsibilities seriously, and we have designed our website so that your personal data is not revealed to us, and only certain statistical information about our users is collected through the use of cookies. This information tells us about the pages you are clicking on or the hardware you are using, but not your name, age, address or any information that we can use to identify you personally. For information on how our site uses cookies, you can review our [Cookie Policy](#).

This Policy explains what Personal Data we collect, how we process it and how long we retain it, and applies to all of our processing activities where we act as a data controller.

In this Policy, ‘we’, ‘us’ and ‘our’ refers to Holo Limited, a company incorporated in Gibraltar. For more information about us, see [Section 11](#) of this Policy.

In this Policy, ‘Personal Data’ means any information relating to you, the Data Subject, as an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

For the avoidance of doubt, it does not include data from which you cannot be identified (which is referred to simply as data, non-personal data, anonymous data, or de-identified data).

In this Policy, ‘processing’ means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## 1. Navigating this Policy

If you are viewing this Policy online, you can click on the below links to jump to the relevant section:

1. Navigating this Policy	1
2. How We Use Personal Data	2
2.1. When visiting our website	2
2.2. When subscribing to our Newsletter	3
2.3. When receiving our Newsletter	3
2.4. When participating in the HOTO sale	3
2.5. When receiving our Holo host info-email	4
2.6. When visiting our Twitter or Medium Profile	4
2.7. Other uses of your Personal Data	4
3. Use of Third Party Applications	5

3.1. Mailing List software	5
3.2. Webform collection	5
3.2. Transmitting Social Media Links	5
3.3. Ethereum Blockchain	5
4. Sharing Your Personal Data	5
5. Transferring Your Personal Data outside of the EU	5
6. Existence of Automated Decision-making	6
7. Data Security	6
8. Your Rights as a Data Subject	6
Right Information and access	6
Right to rectification	6
Right to erasure (right to be ‘forgotten’)	6
Right to restrict processing and right to object to processing	7
Right to data portability	7
Right to freedom from automated decision-making	7
Right to object to direct marketing (‘opting out’)	7
Right to request access	8
Right to withdraw consent	8
Right to lodge a complaint with a relevant supervisory authority	8
9. Storing Personal Data	8
10. Changes to this Privacy Policy	9
11. Our details	9

## 2. How We Use Personal Data

### 2.1. When visiting our website

We may collect and process Personal Data about your use of our website. This data may include:

- the browser types and versions used;
- the operating system used by the accessing system;
- the website from which an accessing system reaches our website (so-called referrers);
- behaviour: subpage, duration, and revisit;
- the date and time of access to our website,
- the Internet protocol address (‘IP address’);
- the Internet service provider of the accessing system; and
- any other similar data and information that may be used in the event of attacks on our information technology systems.

This data may be processed in order to deliver the content of our website correctly, to optimise the content of our website to ensure the long-term viability of our information technology systems and website technology, and to provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

We also collect, use and share ‘Aggregated Data’ such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law provided it has been de-identified and anonymised. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. If we combine or connect Aggregated Data with your personal data so that

it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

The legal basis for processing this data is our legitimate business interests, namely monitoring and improving our website and the proper protection of our business against risks and your consent when agreeing to accept cookies.

Personal Data will be stored for 14 months and will be deleted automatically afterwards, or de-identified for statistical purposes, and in this latter case shall be kept indefinitely.

In certain cases, some of the above data is collected using cookies, and includes data from which you cannot be identified. Such data will be retained in accordance with our [Cookie Policy](#).

## **2.2. When subscribing to our Newsletter**

We may collect and process the Personal Data that you provide to us for the purpose of subscribing to our email newsletter. This data may include:

- your email address
- the date and time of registration
- your IP address

This data is collected and processed for the purpose of sending you our newsletter.

The legal basis for this processing is your consent as provided in the double opt-in confirmation part of our newsletter sign-up process.

Your email address will be stored as long we have the consent to send you a newsletter.

## **2.3. When receiving our Newsletter**

If you have subscribed to our newsletter, each time you receive a newsletter from us, we may

collect and process Personal Data. This data may include:

- the date and time you opened the email;
- what (if any) links or URLs you accessed from our newsletter;
- the location it was accessed from

This data is collected and processed for the purpose of improving the content of our newsletter. The legal basis for this processing is your consent as provided in the double opt-in confirmation part of our newsletter sign-up process.

## **2.4. When receiving our Holo host info-email**

If you have subscribed to our info - email each time you receive a newsletter from us we may collect and process Personal Data. This data may include:

- the date and time you opened the email;
- what (if any) links or URLs you accessed from our Newsletter; and
- the location it was accessed from

This data is collected and processed for the purposes of improving the content of our info-email. The legal basis for this processing is your consent. The collected data will be deleted after 6 months.

## **2.5. When visiting our Twitter or Medium Profile**

We may collect and process Personal Data about your use of our Twitter or Medium Profile. This data may include:

- clicks on a shortened URL
- a history of referral URLs for clicks of a shortened URL
- and a history of IP addresses used to access a shortened URL

This data is collected and processed for the purposes to track the success of the marketing campaigns, blog posts, and other marketing material; and for user demographics in order to identify target markets. This data is collected and processed for the purpose of improving the content of our shared links pursuant to our legitimate interests.

## **2.6. Other uses of your Personal Data**

We may process any of your Personal Data where it is necessary to establish, exercise, or defend legal claims. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

Further, we may process your Personal Data where such processing is necessary in order for us to comply with a legal obligation to which we are subject.

## **3. Use of Third Party Applications**

### **3.1. Mailing List software**

We use Drip to send out newsletters to subscribers. This allows us to prepare customised emails and manage our subscribers.

We do not store any information collected by our mailing list provider.

Drip's Privacy Policy is available at <https://www.drip.com/privacy>.

Drip's purpose and function is further explained under the following link <https://www.drip.com>.

### **3.2. Webform collection**

We use various systems for the registration and submission process of webforms. One example of webform collection we use is Typeform.

Further information and the applicable data protection provisions of typeform please visit <https://admin.typeform.com/to/dwk6gt>.

Typeform's purpose and function is further explained under the following Link <https://www.typeform.com/product/>.

### **3.2. Transmitting Social Media Links**

This website provides links to our social media profiles. These services might also collect Personal Data. Below is a broad selection of social media applications that we may currently use or potentially use in the future:

Facebook: <https://www.facebook.com/policy.php>

Twitter: <https://twitter.com/de/privacy>

Reddit: <https://www.redditinc.com/policies/privacy-policy>

Medium: <https://medium.com/policy/medium-privacy-policy-f03bf92035c9>

Please refer to their privacy policies on the above links, noting however that they may be changed without notice by those social media service providers. We are not responsible for the privacy policies and practices of other organisations and you should check with the relevant organisation as to how they manage Personal Data and any updates they may make to their policies.

### **3.3. Ethereum Blockchain**

The information will be displayed permanently and public, this is part of the nature of the blockchain. If you are new to this field, we highly recommend informing yourself about the blockchain technology before using our services.

Blockchains such as the Ethereum Blockchain distribute a ledger of data all over the world (across several 'nodes' which usually replicate the ledger). This means there is no single person making decisions or otherwise administering the system (such as an operator of a cloud computing system), and that there is no centralised place where it is located either.

Accordingly, by design, a blockchain's records cannot be changed or deleted and is said to be 'immutable'. This may affect your ability to exercise your rights such as your right to erasure (also known as the right to be forgotten), or your rights to object or restrict processing, of your Personal Data.

**Given the technological design of the blockchain, certain data stored on it (which may include Personal Data) will become public and it will not likely be possible to delete or change the data at any given time. If you want to ensure your privacy rights are not affected in any way, you should not transact on blockchains.**

## **4. Sharing Your Personal Data**

We may pass your information to our business partners, administration centres, third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing our services to you.

In addition, when we use any other third-party service providers, we will disclose only the personal information that is necessary to deliver the service required and we will ensure, that they keep your information secure and not to use it for their own direct marketing purposes.

In addition, we may transfer your personal information to a third party as part of a sale of some, or all, of our business and assets or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation. However, we will take steps to ensure that your privacy rights continue to be protected.

## **5. Transferring Your Personal Data outside of the EU**

The distribution of our newsletter is realized with Drip, which is based in the US. Drip is certified under the EU-US Privacy Shield and is GDPR compliant.

As explained above in this Policy, some of our products and services rely on blockchain technology. Interacting with a global decentralised public network means that any Personal Data written onto blockchains may be transferred and stored across the globe.

## **6. Existence of Automated Decision-making**

We do not use automatic decision-making or profiling when processing Personal Data.

## **7. Data Security**

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Your Rights as a Data Subject**

You have certain rights under applicable legislation, and in particular under Regulation EU 2016/679, 'General Data Protection Regulation' or GDPR. We explain these rights below. You can find out more about the GDPR and your rights by accessing the European Commission's website: [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en).

### The right to information and access

You have a right to be informed about the processing of your Personal Data (and if you did not give it to us, information as to the source) and this Policy intends to provide the information. Of course, if you have any further questions you can contact us using the details found under [Section 11](#) of this Policy.

### The right to rectification

You have the right to have any inaccurate personal information about you rectified and to have any incomplete personal information about you completed. You may also request that we restrict the processing of that information.

The accuracy of your information is important to us. If you do not want us to use your Personal Data in the manner set out in this Policy, or need to advise us of any changes to your personal information, or would like any more information about the way in which we collect and use your Personal Information, please contact us using the details found under [Section 11](#) of this Policy.

Please refer to our warning under the '[3.3. Ethereum Blockchain](#)' section of this Policy, which provides details on how this right may be affected.

#### The right to erasure (right to be 'forgotten')

You have the general right to request the erasure of your personal information in the following circumstances:

- the personal information is no longer necessary for the purpose for which it was collected;
- you withdraw your consent to consent based processing and no other legal justification for processing applies;
- you object to processing for direct marketing purposes;
- we unlawfully processed your personal information; and
- erasure is required to comply with a legal obligation that applies to us.

However, when interacting with the blockchain we may not be able to ensure that your Personal Data is deleted. In these circumstances we will only be able to ensure that all Personal Data that is held by us is permanently deleted.

Please refer to our warning under [Section 3.3](#) of this Policy, which provides details on how this right may be affected.

We will proceed to comply with an erasure request without delay unless continued retention is necessary for:

- Exercising the right of freedom of expression and information;
- Complying with a legal obligation under EU or other applicable law;
- The performance of a task carried out in the public interest;
- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- The establishment, exercise, or defence of legal claims.

#### The right to restrict processing and right to object to processing

You have a right to restrict processing of your personal information, such as where:

- you contest the accuracy of the personal information;
- where processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed personal information;
- we no longer need to process your personal information but need to retain your information for the establishment, exercise, or defence of legal claims.

You also have the right to object to the processing of your personal information under certain circumstances, such as where the processing is based on your consent and you withdraw that consent. This may impact the services we can provide and we will explain this to you if you decide to exercise this right.

However, when interacting with the blockchain, as it is a public decentralised network, we are unlikely to be able to prevent external parties from processing any Personal Data which has been written onto the blockchain. In these circumstances we will use our reasonable endeavours to ensure that all processing of Personal Data held by us is restricted. However, you may be unable to fully enforce your right to restrict processing..

Please refer to our warning under [Section 3.3](#) of this Policy, which provides details on how this right may be affected.

#### The right to data portability

Where the legal basis for our processing is your consent or the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, you have a right to receive the personal information you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

#### The right to freedom from automated decision-making

As explained above, we do not use automated decision-making, but where any automated decision-making takes place, you have the right in this case to express your point of view and to contest the decision, as well as request that decisions based on automated processing concerning you or significantly affecting you and based on your Personal Data are made by natural persons, not only by computers.

#### The right to object to direct marketing ('opting out')

You have a choice about whether or not you wish to receive information from us. We will not contact you for marketing purposes unless:

- you have a business relationship with us, and we rely on our legitimate interests as the lawful basis for processing (as described above);
- you have otherwise given your prior consent (such as when you download one of our guides)

You can change your marketing preferences at any time by contacting us using the details found under [Section 11](#) of this Policy.

On each and every marketing communication, we will always provide the option for you to exercise your right to object to the processing of your Personal Data for marketing purposes (known as 'opting-out') by clicking on the 'unsubscribe' button on our marketing emails or choosing a similar opt-out option on any forms we use to collect your Personal Data. You may also opt-out at any time by contacting us using the details found under [Section 11](#) of this Policy.

Please note that any administrative or service-related communications (to offer our services, or notify you of an update to this Policy or applicable terms of business, etc.) will solely be directed at our clients or business partners, and such communications generally do not offer an option to unsubscribe, as they are necessary to provide the services requested.

Therefore, please be aware that your ability to opt-out from receiving marketing and promotional materials does not change our right to contact you regarding your use of our



website and/or our products and services, or as part of a contractual relationship we may have with you.

#### The right to request access

You also have a right to access information we hold about you. We are happy to provide you with details of your Personal Data that we hold or process. To protect your Personal Data, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us using the details found under [Section 11](#) of this Policy.

#### The right to withdraw consent

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time by contacting us using the details found under [Section 11](#) of this Policy.

#### The right to raise a complaint about how we have handled your Personal Data

If you wish to raise a complaint on how we have handled your Personal Data, you can contact us using the details found under [Section 11](#) of this Policy.

#### The right to lodge a complaint with the relevant supervisory authority

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Data Protection Commissioner under the Data Protection Act, which is the Gibraltar Regulatory Authority (GRA). You may contact the GRA below at:

Gibraltar Data Protection Commissioner  
Gibraltar Regulatory Authority  
2nd Floor, Eurotowers 4  
1 Europort Road  
Gibraltar  
Email: [info@gra.gi](mailto:info@gra.gi)  
Phone: (+350) 200 74636  
Fax: (+350) 200 72166

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work, or the place where you allege an infringement of one or more of our rights has taken place, if that is based in the EEA.

## **9. Storing Personal Data**

We retain your information only for as long as is necessary for the purposes for which we process the information as set out in this Policy. Records can be held on a variety of media (physical or electronic) and formats.

Retention periods are determined based on the type of record, the nature of the data and activity and the legal or regulatory requirements that apply to those data. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of the Personal Data, the purposes for which we process the Personal Data and whether we can achieve those purposes through other means, considering the applicable legal requirements that may require us to retain or destroy it.

However, we may retain your Personal Data for a longer period of time where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **10. Changes to this Privacy Policy**

We may make changes to this Policy from time to time. Where we do so, we will notify those who have a business relationship with us or who are subscribed to our emailing lists directly of the changes, and change the ‘Last Updated’ date above. We encourage you to review this Policy whenever you access or use our website to stay informed about our information practices and the choices available to you. If you do not agree to the revised Policy, you should discontinue your use of this website.

## **11. Our details**

This website is owned and operated by Holo Limited; a company incorporated in Gibraltar (Company Registration Number 116305) with registered address at Leon House, Secretary’s Lane, Gibraltar, GX11 1AA.

If you have any queries concerning your rights under this Policy, please contact us at [privacy@holo.host](mailto:privacy@holo.host).