

## Privacy Policy and Data Protection Notice

Last Updated on June 9, 2022

This Privacy Policy and Data Protection Notice (the “**Data Protection Notice**”) explains how and which type of personal data Bebop Trading Limited (“**Company**,” “**we**,” and “**us**”) may collect, and how we may, use or share that data. It also helps you understand your privacy rights under the law of the British Virgin Islands.

The Company’s website can be accessed here <https://www.bebop.xyz> (the “**Website**”) and any related content, applications, application programming interfaces (“**APIs**”), tools, features and functionality offered on or through or in connection with our Website are individually and collectively referred to as the “**Interface**”.

We use the term “personal data” to mean data that may enable us or any third party (whether fiscal, commercial or governmental) to identify a natural person, such as you (whether from the data itself on its own, or in connection with other data). It includes but is not limited to a person’s name, IP address, wallet ID, browsing habits, geolocation, tax ID, credit card number, passport number and driving licence number. It does not include aggregated or deidentified information that is maintained in a form that is not reasonably capable of being associated with or linked to you.

When you use the Interface, the principal information that we may collect from you is your third party non-custodial digital wallet (“**Wallet**”) address, and your IP address. Certain other information identified below may also be collected. We may also collect information such as completed transaction hashes, and the token names, symbols, or other blockchain identifiers of the tokens that you swap.

To the extent you provide personal data to us or one or more of our agents for processing via your use of the Interface, your personal data will be processed in accordance with this Data Protection Notice. Processing is used to mean any action in relation to that personal data including (but not limited to) storing, transferring, mining, disclosing, modifying, deleting and aggregating with other data.

### **The data controller**

The Company is the data controller in respect of your personal data as it makes decisions about how, why and where the personal data you provide to us is processed. As we are a BVI company, we are required to process personal data in accordance with BVI law and any other applicable law in respect of the processing of personal data (the “**Data Protection Legislation**”).

This Data Protection Notice applies to the processing of personal data processed both by us and on our behalf by any processors we have appointed.

Our Data Protection Notice only applies to personal data collected and processed by or on our behalf through your access to the Interface. It does not apply to any personal data that may be collected and processed by or for third parties. This includes third parties such as Google Analytics and Hotjar who might collect personal data through cookies and other software. The data protection notices of those third parties govern their collection and use of any such personal data and you should familiarise yourself with their data protection policies and the privacy settings of the websites of those third parties.

### **The personal data that we collect**

The categories of personal data we may collect, share, disclose, delete and otherwise process will depend on how you interact with us, and the requirements of applicable law. We may collect, process and transfer personal data that you provide to us (or an agent acting on our behalf), as well as personal data that is obtained automatically when you browse or interact with our website or the interface, as well as personal data from other sources such as third-party services and organisations, as described below.

We may collect the following personal data that you provide to us:

- We may collect personal data such as email address, phone number, and/or address if you contact us or otherwise communicate with us.
- We may collect personal data that you submit or make available through messaging and chat features, or when you comment in forums, blogs, and social media pages hosted or made available through the Interface. Any personal data you provide using public sharing features (referred to herein as “User Content”) will be considered “public,” unless otherwise required by applicable law. Please consider whether you want to reveal personal data that may identify you to other users particularly if you do not know those persons. We may collect personal data automatically when you browse our website or interact with us, as follows:

We may collect certain personal data automatically when you browse our website. This may include your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), date and time stamps, mobile device ID, and Internet service provider. We may also automatically collect personal data such as pages that you visit before, during and after any actual or abandoned transaction on the interface, information about the links you click, the types of content you interact with, the frequency and duration of your activities.

We, as well as third parties that provide content or other functionality on the website, may use cookies, pixel tags, local storage, and other such software to automatically collect personal data, including your personal data.

We do so for necessary operational reasons, such as to enhance your experience of using the website, as well as to better understand how our users or prospective users might interact with our website. We also want to ensure that we prevent fraud and other unlawful use of the website.

Where third parties collect personal data through cookies, pixel tags/web beacons and other software, your personal data will be processed by them and in accordance with their privacy policies and data protection notices. These third parties include:

**Google Analytics.** For more information, please visit [Google Analytics’ Privacy Policy](#). To learn more about how to opt-out of Google Analytics’ use of your personal data, please click [here](#).

**Hotjar.** For more information, please visit [Hotjar’s Privacy Policy](#). To learn more about how to opt-out of Hotjar’s use of your personal data, please click [here](#).

Our website may contain buttons for social media and other platforms such as GitHub, Twitter, Telegram, Discord and LinkedIn (that might include widgets such as the “share this” button or other interactive mini programs). These features may collect your IP address, which pages you are visiting, and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

We may obtain personal data about you from other sources. For example, if you access our website through a third-party application, such as an app store, a third-party login service, a third party wallet provider, or a social networking site, we may collect personal data about you from that third-party application, depending on the choices you made via your privacy settings with those third party websites and applications.

## **Use of your personal data**

We use your personal data for a variety of purposes, as described below.

We use your personal data to fulfil any contract we have with you, including the Terms of Use. These purposes include:

- Managing your personal data;
- Answering requests for customer or technical support;
- Communicating with you about the Interface; and
- Allowing you to learn more about and to register for and attend events and receive other benefits associated with using our interface. We may use your personal data for various administrative and compliance purposes, such as (but not limited to):
  - Network and information security, and fraud prevention;
  - Surveillance and detecting security incidents, protecting against actual or attempted unlawful, deceptive, fraudulent or illegal activity (and assisting law enforcement wherever law enforcement is based with such pursuit);
  - Improving, upgrading or enhancing the website;
  - Developing new products and associated services;
  - Ensuring internal quality control and safety;
  - Complying with legal, tax or regulatory enquiries or investigations including assisting law enforcement and other governmental departments or agencies by filing suspicious activity and transaction reports and sharing personal data to support any lawful tax, fiscal, regulatory, legal, administrative law or criminal investigation;
  - Authenticating and verifying individual identities, including requests to exercise rights under this Data Protection Notice and applicable law;
  - Debugging to identify and repair errors;
  - Audit of interactions, transactions and other compliance activities;
  - Managing our risk and operations;
  - Enforcing our agreements and policies; and
  - Complying with our legal obligations.

We may also use personal data to provide you with tailored content, such as through email campaigns for marketing purposes. We shall provide you with these materials only as permitted by applicable law.

We may use your data for business transactions or reorganizations. We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal data to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal data may also be disclosed in the event of insolvency, bankruptcy, or receivership. We may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We also use your personal data for other purposes as requested by you or as permitted by applicable law. For example:

- We may use personal data for other lawful purposes that are clearly disclosed to you at the time you provide personal data or with your consent.
- We may use personal data and other data about you to create de-identified and/or aggregated information, such as de-identified demographic information, de-identified location information, information about the device from which you access our website, or other analyses we create.
- We may create anonymised data records from your personal data. We may use this data to analyse requests and usage patterns so that we improve the services we offer to our users. We reserve the right to use this data for any purpose and to disclose this to third parties without any restriction or prior notice to you.

By accessing the Website, whether or not you use the Interface, you consent to the processing of your personal data for the purposes set out herein. If you do not consent or wish to withdraw your consent, you are not permitted to access the Website or use the Interface.

### **Disclosure and sharing of personal data**

We may disclose your personal data to third parties for a variety of purposes, including to protect us or others from attempted fraud, to support law enforcement, regulators or government authorities (wherever situated), or in the event of a merger, sale, or asset transfer. The privacy policy of those third parties will apply to the processing of your personal data in these cases. Where a tax authority, regulator, government, or law enforcement agency requests that we voluntarily provide your personal data to them, whether or not they are incorporated, formed or registered in the BVI, we shall reserve the right to do so without first seeking your express permission to do so provided we consider in our absolute discretion that that request is not frivolous. If you are not comfortable with this potential disclosure of your personal data, you must not provide it to us and you must not access the Website or use the Interface.

### **The rights you have in respect of your personal data**

The rights you may have about your personal data are determined by applicable law and under BVI law, include the following rights:

- If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive emails as are necessary to enable us to provide products and any related services associated with the interface. We may also send you certain non-promotional communications. You will not be able to opt out of those communications.
- You may stop or restrict the placement of cookies and other comparable software on your device or remove them by adjusting your preferences as your browser or device permits. Please note that cookie-based opt-outs may not be effective on mobile applications, and you must separately opt out in each browser and on each device. You may access your personal data held by us: if we hold such personal data, you are entitled to know (i) whether we are processing your personal data; and (ii) to receive an electronic copy of the personal data that we are processing (subject to limited exceptions);
- You are entitled to require that we correct or that we enable you to correct any of your personal data where it is inaccurate or incomplete;
- You are entitled to require that we delete your personal data (subject to limited exceptions);
- You are entitled to object to certain kinds of processing of your personal data (such as for marketing purposes); and
- You are entitled to withdraw your consent to our processing of your personal data where you have previously consented to our processing (subject to limited exceptions).

If you would like to exercise any of these rights, please contact us using the email address provided in the "[Contact Us](#)" section below. We will process such requests in accordance with applicable laws. We may require satisfactory proof of identity in order to proceed.

### **Protecting your information**

While we take reasonable steps to protect your personal information, nothing on the internet is 100% secure. For these reasons, we cannot guarantee that all of your personal information will never be disclosed in ways you do not expect, or which are not described in this Data Protection Notice. While we protect our systems and services, we cannot guarantee the security of your information during transmission and any transmission is at your own risk. You are also responsible for making sure your personal information is accurate and up-to-date.

By providing personal data to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues.

## **International data transfers**

All personal data processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, other countries, legal areas, or territories which may have data protection laws that may be different from the laws of the BVI and not offer comparable protections.

If we transfer personal data to countries outside the BVI we will conduct transfers in accordance with applicable law and regulation.

Regardless of where you live, you acknowledge that any personal information you make available to us may be processed and stored in any country where permitted by law.

## **Retention and deletion of your personal data**

We will retain and process the personal data we collect as described in this Data Protection Notice for as long as necessary to fulfil the purpose(s) for which it was collected, including to provide access to the Interface, establish legal defences, conduct audits, comply with applicable anti-money laundering law and regulations, enforce our agreements, and comply with applicable laws. We are required to, and will, delete any personal data once it is no longer necessary to hold, store or otherwise process it. We reserve the right to delete your account and any personal data it holds if you have not accessed your account within a period of 24 months of its creation.

Notwithstanding the above, and any other information in this Data Protection Notice, we cannot edit or delete any information that is stored on a blockchain as we do not have custody or control over any blockchain. This may include purchases, sales, and transfers related to your blockchain address. When you use the Interface, you are interacting with a public blockchain which provides transparency of your transactions. We are not responsible for any personal data and any information that is made public on a blockchain.

## **Other important points to note**

This website may link to the websites/applications of third parties and third party websites/applications may reference or link to us. These third-party websites and their services are not controlled by us. We encourage you to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal data to third-party websites or applications is at your own risk.

Certain territories may give you different or additional rights under Data Protection Legislation (for example, if you are a California resident or a user in the European Economic Area or the United Kingdom); this may include a right to file a complaint with your local data protection supervisory authority for example if you believe your personal data has been unfairly processed. This right may be in addition to any rights you may have under BVI law. If you are unsure of your data protection rights, you should seek appropriate advice from a suitably qualified person.

We may revise our data processing practices and this Data Protection Notice from time to time in our sole discretion time in which case we will update the “Last Revised” date at the top of this Data Protection Notice. If there are any material changes we will notify you as required by applicable law. You will be deemed to have accepted the updated Data Protection Notice if you continue to use this website.

## **Getting in touch**

If you have any questions about this Data Protection Notice, or you wish to exercise your rights as detailed herein, please contact the Company at: [hello@bebop.xyz](mailto:hello@bebop.xyz).