



PRIVACY POLICY – NOTICE

Decentralized Dispute Resolution System Services

VAIOT Limited



PRIVACY POLICY - NOTICE

This Privacy Policy – Notice (hereinafter referred to as Privacy Notice has been last updated on the [17.12.2024]

1. INTRODUCTION – KNOW YOUR RIGHTS

VAIOT Limited, a company incorporated in Malta, bearing company registration number C89746, and having its registered office situated at Centris Business Gateway Level 4/W, Triq is-Salib tal-Imriehel Central Business District, Birkirkara, CBD 3020, Malta, (hereinafter “The Company” / “we” / “us” / “our”) is committed to protecting and respecting your privacy.

VAIOT Limited is operating a set of online services for the Decentralized Dispute Resolution System ((hereinafter jointly referred to as “DDRS Services”), including: the website (www.ddrs.vaiot.ai), the Waitlist and KYC Service for Expert Jurors, the application (www.ddrs.vaiot.ai/app), the beta testing campaign for the Decentralized Dispute Resolution System.

This Privacy Notice, which we kindly ask you to read carefully, explains how we use any personal data that we receive from you or may collect about you, while you are making use of our services or access our website, how we use it and the way we protect it, in accordance with your privacy rights under applicable privacy laws. Throughout this document, we will refer to certain terms which are defined for clarity. We recommend that you familiarize yourself with the definitions provided in this Privacy Notice to better understand our practices.

Our use of your personal data is subject to your instructions, the EU General Data Protection Regulation ("GDPR"), other relevant Maltese and EU legislation and our professional duty of confidentiality.

By using DDRS Services you agree to the collection and usage of information in accordance with this Privacy Notice.

Should this Privacy Notice be modified or otherwise amended, we shall promptly inform you in accordance with Section 11 titled ‘Changes to Privacy Notice’.

2. GDPR – CONTROLLER DETAILS

For the purposes of GDPR, the Company is the Data Controller responsible for the collection, use, and processing of your personal data in compliance with applicable Data Protection laws, including the GDPR.

Should you wish to request any clarification or additional information in relation to this Privacy Notice, or should you wish to exercise any of your rights in relation to your personal data, you are kindly requested to contact the Data Controller using the details provided below:

Name: VAIOT Limited, represented by Pawel Stopczynski (Director)

Address: Centris Business Gateway Level 4/W, Triq is-Salib tal-Imriehel Central Business District, Birkirkara, CBD 3020, Malta

Email: privacy@vaiot.ai

3. DEFINITIONS

“Data Controller” – The person that determines the purposes and the means of the processing of personal data

“Personal Data” – Any information relating to an identified or identifiable natural person. This may refer to information that could identify you and could be anything like an email address, photo, and C.V.

“Processing” – Any operation which is performed on Personal Data such as collection, storage, use and erasure

4. DATA COLLECTION



We collect Personal Data through a variety of methods to ensure we can provide our services effectively. These methods may include, but are not limited to direct interactions with you, automated technologies, and interactions with third parties.

- Direct interactions involve you directly providing Personal Data when using our DDRS Services, such as (but not limited to) filling in forms (such as but not limited to the Waitlist at www.ddrs.vaiot.ai), setting up an account, participating in DDRS Beta Testing Campaigns, enlisting and participating in the KYC process for Expert Jurors or communicating with us via email, phone, or other channels. You shall be responsible for providing the correct and accurate information that allows us to identify you as a legitimate user and create your own profile. This user profile shall be stored in our database and shall include the username, an identification number, an email address (if provided), your photo or avatar and the rights attached to your profile. We also process information specific to your account, such as your account, your transactions, services ordered, cooperating parties and related data that you have entered. Furthermore through your use of the DDRS Services we store content that you upload, which may contain personal data such as the details of the other party, the signatures and persons who can bind an entity, the values of the contract, the object of the contract, the commencement date, the termination date and any other confidential or personal data uploaded to the system etc. Direct interactions may also involve all the personal and confidential data provided to VAIOT Limited as part of the KYC process for Expert Jurors or any personal data such as your name, surname and email address, social media and other platform's nicks, logins, handles etc. provided as part of DDRS Beta Testing Campaigns.
- Automated technologies, occurs by using our DDRS Services and include the use of cookies that tracks preferences, server logs, and other similar technologies to collect technical data about devices, equipment, browsing actions, and patterns, as further detailed in Section 10 titled 'Cookies and Tracking'. For data security reasons, and marketing and analytical purposes, we keep logs of all the actions you take when using our DDRS Services that trigger an action on the server through your browser or other plugin, such as logging in or out, performing a search, saving, amending or deleting a particular term, requesting an AI prompt, exporting and uploading a document, changing your preferences or password.
- Interactions with third parties occurs when we receive Personal Data from third parties, including business partners, sub-contractors in technical, payment, and delivery services, advertising networks, analytics providers, and search information providers.

5. DATA USE AND PROCESSING

We can only use your Personal Data if we have a lawful reason for doing so. Under data protection laws we may process your personal data either if you have provided us your consent or it is necessary to comply with either a legal obligation, including GDPR requirements, or for the performance of a contract, or for our legitimate interests, when we have a business or commercial reason to use your information, provided this is not overridden by your own rights and interests.

We use Personal Data collected from you for various purposes, including but not limitedly to the following:

- To provide a more personalized experience for you and other users and to better understand how our services and/or website are utilised
- To communicate with you for customer service and support
- To ensure compliance with our legal obligations, including GDPR requirements
- To prevent fraudulent activities, protect the security and integrity of our services and/or website
- To enforce our terms and policies
- To be able to execute certain processes such as clearing you as an Expert Juror through KYC process
- To be able to count your points and distribute rewards for your participation in DDRS Beta Testing
- To be able to execute basic functions of the DDRS Services, especially DDRS application



When we have been provided with your consent, we may use Personal Data for additional purposes such as marketing and promotional communications, and to provide personalized content and recommendations.

6. THIRD PARTY SHARING AND DISCLOSURES

We may share Personal Data with third parties who assist us in providing the services, provided that these third parties are required to maintain the confidentiality of Personal Data and are prohibited from using it for any other purpose. In any case where Personal Data is shared with third parties, we shall ensure that the transfer and sharing complies to GDPR and other applicable Data Protection laws.

We may also be required to disclose Personal Data (as also briefly mentioned above)

- To comply with legal obligations, i.e. disclose your personal data in response to any requests made from law enforcement agencies, government entities, public authorities, and court orders
- To protect our rights, i.e. to obtain legal remedies and/or limit our damages
- To ensure your safety and the safety of other users where we deem necessary or appropriate under applicable laws and regulations

Should we proceed with a merger, acquisition, or asset sale, Personal Data may be transferred as part of that transaction. In such an event, we shall notify you before Personal Data is transferred and becomes subject to a different Privacy Notice or privacy policy.

7. PROTECTION OF YOUR PERSONAL DATA

We hold your Personal Data in digital and hard copies at our offices. We have implemented security measures to protect your Personal Data that we collect from being used or accessed unlawfully or accidentally lost. We only grant access to your Personal Data to those persons who have a genuine need to access it. Those processing your Personal Data are subject to the duty of confidentiality.

8. PERSONAL DATA RETENTION PERIOD

We shall retain your personal data even after the completion of our services to you. We will need to keep your personal data after we have provided you with our services in order to comply with our record keeping requirements in terms of the law and to be able to respond to any questions complaints or claims made by you. We shall not collect more data than we require or retain your data for longer than is required to fulfil the purposes outlined in this Privacy Notice.

9. YOUR RIGHTS AS A USER

This Privacy Notice ensures that your rights are respected and fully upheld in compliance with GDPR. You shall have the following rights:

- The right of access, including the right to be provided with a copy of your Personal Data, the purposes of the processing, and the Third Parties to whom their data has been disclosed.
- The right to rectification, whereby you may require us to correct any inaccurate or incomplete Personal Data. We shall promptly update the Personal Data once the amendment request has been verified and validated.
- The right to be forgotten, whereby you may require us to delete your Personal Data under certain circumstances, such as the data no longer being necessary for the purposes it was collected or when consent is withdrawn, and no other legal ground for processing exists. Upon receiving a request for deletion, we shall take reasonable steps to inform any third parties with whom the Personal Data concerned has been shared, unless this proves impossible or involves disproportionate effort.

- The right to restrict processing, whereby you may require us to restrict the processing of your personal data under certain circumstances
- The right to data portability, whereby you may require us to provide you with your Personal Data in a structured, commonly used, and machine-readable format and transmit / transfer that information to another data controller under certain circumstances This right allows you to move, copy, or transfer your Personal Data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
- The right to object, whereby you may object to our processing of your Personal Data under certain circumstances which include continued processing of your data carried out for the purpose of our legitimate interests
- The right not to be subject to automated processing, whereby you are afforded the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning you or significantly affects you
- The right to withdraw your consent, whereby you may withdraw your consent to the processing of your data at any time.

To exercise any of your rights, you may contact our Data Controller using the contact details provided in Section 2 of this Privacy Notice, titled ‘GDPR – Controller Details’, and we shall respond to your request within the timeframe required by the applicable data protection laws, such as the GDPR. We shall also notify you once the request has been processed and, where applicable, if we are unable to comply with the request, we shall provide you with the reasons for the refusal.

10. COOKIES AND TRACKING

Our website uses cookies and other tracking technologies to enhance your browsing experience, to personalize the content we provide, and to enhance the functionality and performance of our website, including the ability to remember your preferences and login details.

We use these technologies to gather information about your interaction with our website, such as pages visited, time spent on the site, and any interactions you have with our content. This information helps us to improve our website and provide a more tailored experience for our Users. We may also use Cookies and tracking technologies for marketing and analytic purposes, allowing us to understand which parts of our website are most popular and to deliver advertising that is relevant to your interests.

Cookies are small text files (pieces of data) that are stored on your device when you visit a website, and they can be used to remember your preferences and activities. They are categorized based on their purpose and duration. The main types of cookies used by our website include essential cookies, performance cookies, functional cookies, and targeting cookies. Essential cookies are necessary for the functionality of the website and cannot be switched off in our systems. Performance cookies collect information about how visitors use our website, helping us understand the performance and improving our services. Functional cookies allow the website to remember choices users make, such as language or region preferences, providing a more personalized experience. Targeting cookies are used to deliver advertisements more relevant to the user and the user’s interests.

Managing your cookie preferences is essential to provide you with a personalized experience on our website. You can set your preferences for cookies through your browser settings or using our cookie management tool available on the website. This allows you to accept or reject specific types of cookies based on your preferences. Disabling certain types of cookies may affect your experience on our website and the services we may offer.



11. CHANGES TO PRIVACY NOTICE

We may update this Privacy Notice from time to time to reflect changes to our practices or for other operational, legal, or regulatory reasons. Any changes will be posted on this page, and we will update the “Last Updated” date at the top of this Privacy Notice.

If we make significant changes, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website. We encourage you to review this Privacy Notice periodically to stay informed about our data practices and how you can help protect your Personal Data.

Your continued use of our website following the posting of changes to this Privacy Notice will signify your acceptance of those changes. If you do not agree with the updated Privacy Notice, you should stop using our website and services immediately.

12. COMPLAINTS

We would like to resolve any concern that you may have about the processing of your personal data directly with you. However, you have the right to lodge a complaint with the Office of the Information and Data Protection Commissioner which may be contacted at <https://idpc.org.mt/en/Pages/contact/complaints.aspx>.