



Privacy Policy

Vaults Network is owned and operated by DMNS Networks PTE LTD ("Vaults", "Vaults Network", "Company", "we", "us", and "our"). It is our policy to protect the privacy of the users of our Website and Services.

The use of our Website is possible without any indication of your personal data; however, if you want to use services via our Website, the processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from you.

The processing of personal data, such as the name, address, email address, or telephone number of a data subject shall always be in line with the EU General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to the Company. By means of this data protection declaration, our Company would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, we have implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this Website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed.

1. Personal Data

Personal data means any information relating to an identified or identifiable natural person ("data subject"). 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 identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2. Data Subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

3. Processing

Processing is 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

4. Restriction of Processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

5. Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's economic situation, personal preferences, interests, behavior, location or movements.

6. Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

7. Processing Controller

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

8. Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.



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9. Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance of the law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

10. Third Party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

11. Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

12. The Controller

Controller for the purposes of the GDPR, and other data protection laws is:

DMNS Networks PTE LTD

Singapore

support@vaults.network

13. Cookies

This Website uses cookies. Through the use of cookies, we can provide you more user friendly services that would not be possible without the cookie setting.

Cookies are text files that are stored in a computer system via an Internet browser. Many cookies contain a so-called session ID. A session ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique session ID.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

For more information about cookies and other tracking technologies, please review our [Cookie Statement](#).

14. Collection of Data

This Website collects a series of general data and information when you access the Website. This general data and information are stored in the server log files and databases. Collected information can include but is not limited to (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Website, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, the Company does not draw any conclusions about you. Rather, this information is needed to (1) provide our products and services, including the Website, and improve them over time, (2) deliver the content of our Website correctly, (3) optimize the content of our Website as well as potential advertisement, (4) ensure the long-term viability of our information technology systems and website technology, (5) personalize and manage our relationship with you, including introducing you to products or services that may be of interest to you, (6) investigate, respond to, and manage inquiries or events, and (7) provide law enforcement authorities with the information necessary for criminal prosecution. Therefore, the Company analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are



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stored separately from all personal data provided by a data subject.

15. Legal Basis

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. If our Company is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our Company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. They considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

16. Registration

You have the possibility to register on the Website with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the Website, the IP address, website browser, date, and time of the registration are also stored. The storage of this data is necessary to secure the Company as controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of civil and / or criminal prosecution.

The Company provides information upon request to you as to what personal data are stored about you. Also, we correct or erase personal data at the request or indication of you, insofar as there are no statutory storage obligations. The Data Protection Officer is available to you in this respect as a contact person.

17. Newsletter

On the Website, users are given the opportunity to subscribe to our newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

The Company informs its customers and business partners periodically by means of a newsletter. The Company's newsletter may only be received by you if (1) you have a valid email address and (2) you register for the newsletter. Confirmation emails will be sent to the email address registered by you, for legal reasons, a double opt-in procedure is used. Confirmation emails are used to prove whether the owner of the email address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration along with the web browser used. The collection of this data is necessary in order to understand the (possible) misuse of the email address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by email, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter, or in the event of a change in technical circumstances. There will be a limited transfer of personal data collected by the newsletter service to third parties, purely for the purposes of sending the newsletters, recording user behavior, and managing registrations to the service. The subscription to our newsletter may be terminated by you at any time. The consent to the storage of personal data, which you have given for the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter.

18. Newsletter-Tracking

The newsletter of the Company may contain so-called tracking pixels, and tracking links. A tracking pixel is a miniature graphic embedded in such emails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, the Company may see if and when an email was opened by you. Link tracking is used to detail which



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links in the email were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored by a 3rd party and analyzed by the Company in order to optimize the sending of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. You are at any time entitled to revoke the respective separate declaration of consent issued by means of the opt-out procedure.

For more information about cookies and other tracking technologies, please review our [Cookie Statement](#).

19. Contact

The Website contains information that enables a quick electronic contact to our Company, as well as direct communication with us, which also includes a general address of the so-called electronic mail (email address). If you contact the Company by email or via a contact form, the personal data transmitted are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject.

20. Erasure of Data

The Company processes and stores the personal data of the data subjects only for the period necessary to achieve the purpose of storage, or as far as this is granted by the regulations to which the Company may be subject to.

If the storage purpose is not applicable, or if a storage period expires, the personal data are routinely blocked or erased in accordance with legal requirements.

21. Rights

21.1. Right of Confirmation

You have the right to obtain from the Company the confirmation as to whether or not personal data concerning you are being processed. If you wish to avail yourself of this right of confirmation, you may, at any time, contact the Data Protection Officer.

21.2. Right of Access

You have the right to obtain from the Company free information about your personal data stored at any time and a copy of this information (including the purpose of processing, categories of personal data concerned, storage period, and more).

Furthermore, you have a right to obtain information as to whether personal data are transferred to a third country or to an international organization. If this is the case, you have the right to be informed of the appropriate safeguards relating to the transfer.

If you wish to avail yourself of this right of access, you may at any time contact the Data Protection Officer.

21.3. Right to Rectification

You have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement. If you wish to exercise this right to rectification, you may contact the Data Protection Officer.

21.4. Right to Erasure (Right to be Forgotten)

You have the right to obtain from the Company the erasure of personal data concerning you with undue delay, and the Company has the obligation to erase personal data without undue delay, as long as the processing is no longer necessary. You may at any time contact the Data Protection Officer. The Data Protection Officer shall promptly ensure that the erasure request is complied with immediately in line with legal requirements.

21.5. Right of Restriction of Processing

You have the right to obtain from the Company restriction of processing under specific circumstances. If you wish to request the restriction of the processing of personal data stored by the Company, you may at any time contact the Data Protection Officer.

21.6. Right to Data Portability

You have the right to receive from the Company, the personal data concerning you, in a structured, commonly used and machine-readable format. You have the right to transmit those data to another controller without hindrance from the Company, as long as the processing is based on consent pursuant



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to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

21.7. Automated Individual Decision-Making, Including Profiling

Each data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her.

22. Data Protection Provisions

22.1. Google Tag Manager and Google Analytics

The Company has integrated components of Google Tag Manager and Google Analytics into the Website. Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects data about the website from which a person has come (the so called referrer), which sub-pages were visited, or how often and for what duration a sub- page was viewed. Web analytics are often used for the optimization of a website and in order to carry out a cost-benefit analysis of advertising.

The operator of the Google Analytics component is Alphabet Inc.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

22.2. Mailchimp

The Company has integrated components of Mailchimp into the Website for the purpose of newsletter management. Mailchimp is an advanced email marketing, marketing automation, and sales CRM platform. Email address are collected by our Website and communicated to Mailchimp, for processing, newsletter submissions, tracking, analysis and subscription management. Mailchimp collect a range of data as detailed in the Newsletter section of this policy.

The operator of Mailchimp is The Rocket Science Group, LLC

The applicable data protection provisions of Mailchimp may be accessed under:

<https://mailchimp.com/legal/>

22.3. Sendgrid

The Company has integrated components of Sendgrid into the Website for the purpose of sending automated emails. SendGrid provides a cloud-based service that assists businesses with email delivery.

The operator of Sendgrid is Twilio Inc.

The applicable data protection provisions of Sendgrid may be accessed under:

<https://www.twilio.com/legal/privacy>

22.4. Zendesk

The Company has integrated components of Zendesk into the Website for the purpose of customer support management. Zendesk is a ticketing system that acts as a shared inbox for all your customers' questions and concerns. This way, no matter what channel the customer uses to contact the company—email, chat, Twitter, etc.—the support agent is always provided with a consistent ticket, making ticket management much easier for the agent to help the customer more quickly solve the issue to their satisfaction.

The operator of Zendesk is Zendesk, Inc.

The applicable data protection provisions of Zendesk may be accessed under:



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<https://www.zendesk.com/company/policies-procedures/>

23. Data Retention

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract, the initiation of a contract, or for regulatory compliance.

24. Decision-making

We may analyze your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively.