

PRIVACY POLICY

Effective Date: 11/17/2023

1. Policy Statement

This Privacy Policy ("Policy") outlines the practices and procedures of Everstake regarding the collection, usage, storage and sharing of personal information from users utilising our Services and/or Website. By visiting our Website and/or using our Services you agree to the provisions of Privacy Policy and information contained herein. This Privacy Policy forms an integral part of our Terms of Use, available on the Website. You agree that this Privacy Policy shall be read together with mentioned Terms of Use.

2. Definitions

- "Everstake", "Company", "We," "Us," or "Our" refers to Everstake Validation Services LLC, a limited liability company registered in the Cayman Islands, and its affiliates.
- "You", "Your", "Yours", "User" refers to a person accessing our Website or using our Services.
- "Website" refers to everstake.one and relevant domains.
- "Services" refers to provision of Staking services.
- "Staking services" refers to the provision of a possibility to delegate tokens to the Validator node operated by Validator on the Blockchain network to participate in the Validation process and receive Delegator rewards.
- "Personal Information", "Personal Data", "Data", "Information" refers to information that you voluntarily and willingly provide to Us, or that is automatically collected, and can be used to identify you directly or indirectly.

3. What information do We collect?

Everstake does not collect any sensitive data (as outlined in GDPR, [Article 9](#)) about Users that includes details about their religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about Users' health and genetic and biometric data. Everstake only collects Personal Information that it deems to be reasonably necessary to fulfil Users' requests and/or Everstake legitimate business objectives.

Personal Information does not include any publicly available information from government records and de-identified or aggregated consumer information.

We collect your Personal Information for specified, explicit, and legitimate purposes, and we do not further process it in a manner that is incompatible with those purposes. In certain cases, such as archiving for public interest, scientific or historical research, or statistical purposes, further processing is undertaken in accordance with applicable law and is not considered incompatible with the initial purposes.

We ensure that the Personal Information we collect is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

We may collect and process certain types of Personal Information, including, but not limited to:

- Contact Data:
 - Full name;
 - Usernames or handles;
 - Email addresses;
 - Social media handles.
- Blockchain-related Data:
 - Cryptocurrency wallet address;
 - Wallet service provider name;
 - Transaction history and smart contract interactions.
- Device And Connection Information:
 - IP addresses;
 - Browser information (e.g. device type, operating system, language, timezone, type, version);
 - Location information. We receive information from you and third-parties/services that help us approximate your location. We may, for example, use an IP address received from your browser or device to determine approximate location to assist with localization or for security purposes.
- User Content:
 - Any data, including text, images, or multimedia, created or uploaded by the user.
- Additional information provided to Us:
 - User preferences and settings;
 - Consent records for data processing activities, including cookie settings;
 - We also receive Other Information when submitted to our Website or in other ways, such as responses or opinions you provide if you participate in a focus group, contest, activity or event, feedback you provide about our products or services, request support, interact with our social media accounts or otherwise communicate with Us.

4. How do We use Your information?

We process your personal information only for legitimate business purposes, which may include, but not limited to the following:

- To provide, maintain and continuously improve our Website and/or Services.
- To establish relationships, communicate and respond to Your inquiries.
- To send you newsletters, promotional materials, and other marketing communications.
- To comply with legal obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- To protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

5. How do We ensure Data Accuracy?

We take every reasonable step to ensure that your Personal Information is accurate and, where necessary, kept up to date. Inaccurate data, considering the purposes for which it is processed, will be erased or rectified without delay.

6. When and with whom We share Your Information?

We may share your personal information with service providers, affiliates and professional advisors, with whom we cooperate to provide you the Services and/or maintain Website. These data recipients cannot use, share, store or disclose your personal information for the purposes, other than to provide Services and/or maintain Website. Before sharing, we ensure that such recipients have implemented reasonable security measures to protect your personal information as well as are aware of the requirements to maintain confidentiality.

We may also disclose your personal information per request of governmental authorities and/or by the court order.

7. How do we perform international data transfers?

We reserve the right to process your personal information worldwide in accordance with applicable privacy laws and regulations. When your personal information is shared or transferred, we will ensure that the transfer will be subject to appropriate safeguards in accordance with applicable data protection legislation and corresponding level of protection.

8. How do we secure Your personal information?

Everstake renders the Services diligently and professionally, adhering to applicable industry standards, such as SOC2 and ISO/IEC 27001.

Everstake has implemented various measures to ensure the security of the Personal Information it collects. We have taken a comprehensive approach, employing both technical and organisational safeguards to maintain the confidentiality, security, availability, integrity and resilience of the Personal Information gathered from our Users. These measures are aimed at safeguarding User data against misuse, unauthorised access, loss, alterations, or deletion.

Personal Information is securely stored and processed in controlled environments that are not publicly accessible and can only be accessed by authorised employees, consultants, and service providers. These actions encompass a range of strategies, including but not limited to physical controls, data encryption, pseudonymisation, access control, data storage and retention, and the implementation of internal policies.

We have implemented processes for regularly testing, assessing, and evaluating the effectiveness of our technical and organisational measures to ensure the security of the storing and processing of your personal information.

In the event of a suspected breach of Personal Information, Everstake has established procedures to address such incidents. We will notify Users and any relevant regulatory authorities of a breach whenever such notification is legally required. Your data security and privacy are of utmost importance to us.

9. How long do We retain Your personal information?

We will retain your personal information for as long as required for the purposes it was initially obtained for.

In case We have a business relationship with You, we are able to retain your personal information for as long as our business relationship continues.

When We have no purpose to retain and process your personal information, and/or our business relationship with You ends, then we will erase your personal information.

Erased information may be retained in generalised form for our internal statistical purposes, along with your history of actions and requests related to the Website and Services.

10. What are Your rights?

You have certain rights concerning your personal information, including:

- The right to be informed about how Your data is being used.
- The right to access your personal information.
- The right to correct or rectify your personal information.
- The right to request the erasure of your personal information. However, it's important to note that personal information used for contractual obligations or data verification purposes cannot be deleted upon your request.
- The right to withdraw your consent. You have the option to withdraw your consent to receive marketing communications or to share your Personal Information with us anytime.
- The right to object, stop or restrict the processing of your data. If you choose to restrict processing of your personal information, it may affect our ability to provide certain services to you.
- The right to limit use and disclosure of your personal information.
- The right to data portability (allowing you to get and reuse your data for different services).

If you wish to exercise any of the rights mentioned above, please contact us via email mentioned in clause 11 below.

11. How do You contact Us?

If you have any questions, concerns, or requests regarding this Privacy Policy or the processing of your personal information, please contact us at legal@everstake.one.

12. General provisions

We will review and update this Privacy Policy from time to time as required to be in line with applicable data protection rules and regulations. It is your responsibility to review this Privacy Policy for any updates.