

# **Aleo Privacy Policy**

**Last modified: 08/24/2023**

Aleo Systems Inc. (“**Aleo**,” “**we**,” “**our**,” or “**us**”) provides this Privacy Policy (“**Policy**”) to describe our practices related to personally identifiable information (“**Personal Data**”) we collect and process when you visit our website at aleo.org (“**Website**”), use the technologies we offer (“**Services**”), or otherwise interact with us.

## **1. About Us**

Aleo is on a mission to build an actually secure internet, where privacy is by default, users have control over their online identities and personal data, and developers can easily create the best applications to achieve these goals. We are building a fully decentralized platform that is private, permissionless and interoperable. We provide a full-stack developer framework for zero-knowledge applications. We are focused on our community of zero-knowledge developers and advocates who share our belief that we can reboot the internet.

## **2. Aleo as Owner and Data Controller**

Aleo acts as a data controller or business, as defined under relevant law, when it processes Personal Data that relates to our Website visitors and developers, users, and others who use our Services. (We do not process Personal Data from users of applications or services built by developers or other third parties and deployed on the Aleo platform. For information about such indirect users, see below).

## **3. Aleo as Data Processor**

Aleo may also process Personal Data on behalf of and at the direction of individuals and entities who use our Services to build applications and platforms (“**Customers**”). Aleo acts as a data processor or service provider, as defined under relevant law, with respect to this information (“**Customer Data**”). Processing of Customer Data is governed by the relevant Customer’s privacy policy and/or terms of service, our Terms of Service, other contractual agreements that may be required by relevant law, and/or user consent.

Aleo processes Customer Data according to our Customers’ instructions when we act as a data processor or service provider. If you have questions about Customer Data or would like to exercise rights related to Customer Data, you should review the relevant controller’s privacy policy.

#### 4. How we Collect and Use Personal Data

In the table below, we provide the list of categories of Personal Data that Aleo may have collected within the last twelve months or may collect in the future. We also have identified the main sources and potential purposes for collection:

Categories of Personal	Examples	Sources of Personal Data	Purposes for Personal Data Collection
<b>Identifiers</b>	First and last name and middle initial, email address, mobile telephone number, mailing address, Discord ID, or other credentials.	<p>Consumer directly (e.g. forms you complete, files or photos you upload, or through use of services you obtain from us).</p> <p>Third parties (e.g., Persona, Typeform, Discord, Sendgrid, Webflow, Datadog, Github).</p>	<ul style="list-style-type: none"> <li>● Help you access the Website or Services</li> <li>● Communicate with you about Aleo</li> <li>● Provide Aleo Services</li> <li>● Detect and prevent fraud and/or funds loss</li> <li>● Permit our financial partners to verify your identity (KYC)</li> <li>● Permit us and our financial partners or KYC</li> </ul>
<b>Customer Records</b>	Driver's license or other valid government photo identification, credit report, files you upload.	<p>Consumer directly (e.g. forms you complete or services you obtain from us).</p> <p>Third parties, including service providers or contractors (e.g., Persona, Typeform, or via mergers and acquisitions).</p>	<ul style="list-style-type: none"> <li>● Determine your eligibility for and/or provide an Aleo Service</li> <li>● Permit our financial partners to verify your identity (KYC)</li> <li>● Permit us and our financial partners to comply with applicable laws</li> <li>● Detect and prevent fraud and/or funds loss</li> <li>● Enhance security, monitor/ verify identity or service access, combat spam, malware or security risks</li> </ul>

<b>Internet or other electronic network activity information</b>	Browser type, IP address, computer or mobile device unique ID number, device type, software including type, version, language, settings, and configuration.	Consumer indirectly (e.g. from activity on our websites or App, or from cookies, Mixpanel, Datadog, Flash objects, and web beacons, device type, model and manufacturer, mobile device operating system brand and model,	<ul style="list-style-type: none"> <li>● Analytics</li> <li>● Keep our websites and App safe and secure</li> <li>● Improve our services</li> <li>● Ensure network and information security</li> <li>● Statistical modeling</li> </ul>
<b>Professional or employment-related information</b>	Name, address and telephone number of your employer, or your job title.	<p>Consumer directly (e.g. forms you complete or services you obtain from us).</p> <p>Third party service providers or contractors (e.g., Persona, Typeform).</p>	<ul style="list-style-type: none"> <li>● Determine your eligibility for Aleo programs, Services or employment</li> </ul>
<b>Social Media Data</b>	Profile information, user name, user ID associated with your social media account.	<p>Consumer directly (e.g., forms you complete) and indirectly (e.g. when you interact with Aleo through social media such as Discord, Twitter, etc.).</p> <p>Third party service providers or contractors</p>	<ul style="list-style-type: none"> <li>● Analytics</li> <li>● Communicate with you about Aleo</li> <li>● Provide Aleo Services</li> </ul>

We may process and disclose Personal Data that has been aggregated and anonymized without limitation where such information is no longer capable of identifying a specific individual.

**5. Processing Purpose, Use, and Legal Basis**

Aleo may process and may share the categories of Personal Data described above with the categories of third parties described below for the following purposes on the on the lawful basis of our legitimate interest:

- To analyze trends;
- Update our records;
- Improve and personalize our Website and Services;

- Administer our Websites and Services, including to improve security and performance, and ensure proper functioning;
- Review compliance with applicable usage terms;
- Provide necessary functionality;
- Complete transactions;
- Handle support requests; and
- Other business purposes including fraud prevention and product development.

We process Personal Data on the lawful basis of contract where processing is necessary to perform a contract with you, such as when you use our Services to develop applications on our platform. We may also process Personal Data on the lawful basis of legal obligation where we are required to use Personal Data to fulfill regulatory or legal obligations, such as where recordkeeping laws require that we collect and retain certain information about our Website visitors or Customers.

We may process your Personal Data for other purposes about which we will notify you in advance, or for which we receive your consent.

## 6. How We Disclose and Share Personal Data

Aleo may disclose and share the types of Personal Data described above with the categories of third parties listed below or as otherwise expressly authorized by you in writing. All Personal Data types listed above are shared for business purposes, as detailed below. We do not sell Personal Data we collect.

<b>Categories of third parties with whom Personal Data has been disclosed or</b>	<b>Why we disclose or share your Personal Data</b>
<b>Service Providers</b>	We may share your Personal Data with service providers including third party vendors, consultants, or contractors, such as cloud hosting providers (to provide data storage and processing services), communications providers (to process new queries and to manage our emails), or analytics companies (to perform analysis), or in order to complete third party financial, technical, compliance and legal audits of our operations or otherwise comply with our legal
<b>Event Co-Sponsors/ Partners</b>	We may share your Personal Data with a partner or co-sponsor if you sign up for an event or content that is co-hosted by Aleo and one of its partners or co-sponsors. Please see our partner or co-sponsors' privacy policies for further information about how they use Personal

<b>Purchasers of Our Business</b>	We may share or transfer your Personal Data in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another
<b>Law Enforcement</b>	We may share your Personal Data in order to comply, as necessary, with applicable laws and regulatory requirements, as well as legal process, respond to mandatory legal or governmental requests or demands for information, enforce our agreements, policies, procedures and terms of use, and protect ourselves, our customers, or the general public from illegal activities.
<b>Payment Processors and Financial Services Providers</b>	We may share your Personal Data with our KYC providers to perform identity verification and sanctions list checks, and with our payment processors and financial service providers as necessary to enable them to process payments, and for anti-fraud purposes.
<b>Business Partners and Aleo Affiliates</b>	We may share your Personal Data with our Business Partners as necessary to provide you with the Aleo Services. Specifically, we may share your Personal Data if: <ul style="list-style-type: none"> <li>● Aleo is involved in a merger, acquisition, or sale of all or a portion of its assets.</li> <li>● The company by which data is being shared is owned or under common ownership as Aleo, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns.</li> </ul>

**7. Transfers of Personal Data**

**International Transfers.** Aleo is headquartered in the United States. If you are a resident of the EEA, UK, or Switzerland, please be aware that Personal Data related to you may be transferred to, stored, and processed by Aleo in our U.S. facilities, as well as to our service providers and other third party partners located outside the EEA or UK. These countries may have data protection laws that are different to the laws of your country.

If you require further information about our international transfers of Personal Data, please contact us using the information in the “Contact Us” section below.

**8. Your Privacy Rights**

**Rights for Individuals in the EEA, UK, and Switzerland.** Where Aleo is acting as a controller, and depending on your jurisdiction, and subject to applicable law, you may have the rights below with regard to the Personal Data we control about you:

- The **right of access** means that you have the right to request that we disclose what Personal Data we have collected, used, and disclosed about you.
- The **right to erasure** means that you have the right to request that we delete Personal Data about you that we have collected or maintained, subject to certain exceptions.
- The right to ask us to **correct or update** Personal Data we maintain about you.
- The **right to object** to our processing of Personal Data about you.
- The right to ask us to **restrict processing** of Personal Data about you, under certain conditions.
- The right to receive Personal Data about you in a **portable** format, or request that we transfer such data to another organization, under certain conditions.
- Where we have collected and processed Personal Data with your consent, you may **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of Personal Data about you conducted in reliance on lawful grounds other than consent.
- You have the right to **opt-out of any marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you, or you can contact us using the contact information below. Please note that if you unsubscribe from our marketing communications, you will still receive communications related to your account and/or relationship with us, as well as communications related to your use of our Services.
- You have the **right to complain** to a data protection authority about our Personal Data processing activities. For more information or to lodge a complaint, please contact your local data protection authority.
- We do not use Personal Data to engage in automated decision making that produces legal or similarly significant effects.

You may exercise the above rights by contacting us at [hello@aleo.com](mailto:hello@aleo.com).

Requests to exercise rights related to Customer Data should be submitted directly to the relevant Customer utilizing our Services. Customers’ practices related to Customer Data are not governed by this Policy, and we are not responsible for and do not have control over our Customers’ data practices. For more information regarding how a given Customer uses Customer Data, please review that Customer’s privacy policy.

**California Privacy Rights.** As a California consumer, you have the following choices regarding our use and disclosure of your Personal Data subject to certain limitations under the California Consumer Privacy Act (“CCPA”):

- **Right to know.** You may request, up to twice in a 12-month period, the following information about the Personal Data we have collected, used, disclosed or sold about you during the past 12 months:
  - the categories and specific pieces of Personal Data we have collected about you;

- the categories of sources from which we collected the Personal Data;
  - the business or commercial purpose for which we collected the Personal Data;
  - the categories of third parties with whom we shared the Personal Data; and
  - the categories of Personal Data about you that we disclosed for a business purpose and sold to third parties, and the categories of third parties to whom the information was disclosed or sold.
- **Right to delete.** You may request that we delete the Personal Data we have collected from you, subject to certain limitations under the CCPA.
  - **Right to opt-out from sale and sharing of Personal Data.** You have the right to opt-out of the sale and sharing of your Personal Data with certain third-party, interest-based advertising partners. **We do not sell your Personal Data or share your Personal Data with interest-based advertising partners.**
  - **Right to correct.** You may request to correct certain inaccurate Personal Data we have collected about you.
  - **Right to limit processing and disclosure.** You have the right to limit the use, processing, and disclosure of certain sensitive Personal Data we have collected about you.
  - **Non-discrimination.** The CCPA provides that you may not be discriminated against for exercising these rights.

To submit a request to exercise any of the rights described above, you may email us at [hello@aleo.org](mailto:hello@aleo.org) or contact us by mail at 415 Mission St, Floor 37, San Francisco, CA 94105. We will verify your identity before responding to your request by either verifying that the email address from which you send the request matches your email address that we have on file.

### **Consumer Request by an Authorized Agent**

If any authorized agent submits a consumer request under the CCPA on your behalf, we require the authorized agent to submit the following information so that we can confirm their authority to act on your behalf:

- Evidence of authorization to act on behalf of the California consumer: (1) California Secretary of State authorization, (2) notarized written permission from the California consumer, or (3) power of attorney.
- Evidence of identity of the California consumer: (1) first and last name, (2) email address, and (3) password.

### **9. Cookies & Analytics Services**

We may partner with certain third-party service providers to provide analytics services (“**Analytics Partners**”). These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of our Website and Services.

Our Analytics Partners use these technologies to help us improve and personalize the overall experience of our Website and Services, and understand usage of the same.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the Website, as some features and services on our Website may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it.

### **10. Third Party Links & Tools**

Our Website and Services may contain links to websites or platforms owned or controlled by other companies, such as Discord and GitHub. We have no control over and are not responsible for the data collection and use practices, nor the privacy policies, of such third-party websites or platforms. We encourage you to be aware when you leave our Website or Services and to read the privacy policies of other websites you visit and platforms you use.

### **11. Control Over Your Information**

From time to time, we may send you emails regarding updates to our Website, Services, notices about our organization, or information about the Services we offer (or promotional offers from third parties) that we think may be of interest to you. If you wish to unsubscribe from such email marketing communications, simply click the “unsubscribe link” provided at the bottom of the email communication. Unsubscribing from such marketing communications will not affect your receipt of certain services-related email communications, such as updates about Aleo technology, confirmations of transactions, technical or legal notices.

### **12. Data Retention and Protection**

We will retain your Personal Data for as long as is necessary to fulfill the purposes for which it was collected, comply with any laws or regulations, resolve disputes, and enforce or perform our agreements. We may retain your data for a legitimate business interest where our business benefit is not outweighed by your personal rights and freedoms. Customer Data processed is retained in accordance with the policies and practices of our Customers and any applicable agreements between us and our Customers.



### **13. Changes to Privacy Policy**

We reserve the right to change this Policy from time to time in our sole discretion. We will post changes on this page. The “last modified” date at the top of this page indicates the date this Policy was most recently updated. Please check back often for any updates. Your continued use of our Website or Services after any change to this Policy will constitute your acceptance of such change.

### **14. Contact Us**

For inquiries about this Policy or our Personal Data practices, please send us an email at [hello@aleo.org](mailto:hello@aleo.org), or contact us at 415 Mission St, Floor 37, San Francisco, CA 94105.