



NFTCDN LTD – PRIVACY POLICY

We are NFTCDN LTD. We are a company registered in England and Wales with company number 14542292, whose registered address is at 128 City Road, London, United Kingdom, EC1V 2NX. NFTCDN LTD is registered with the UK Information Commissioner's Office under registration number ZB644962.

At NFTCDN LTD ("NFTCDN", "the **Provider**", "**we**", "**us**", or "**our**"), we are dedicated to safeguarding the privacy and ensuring the protection of the personal information of the individuals or entities who use our Services ("**Customer**") and the end-users ("**end-user**") of our SaaS products (collectively referred to as "**you**", "**your**" or "**yourself**").

Our Privacy Policy ("**Policy**") outlines the information we collect (including through cookies), how it is used, who has access to the data collected, the rights our users have with respect to their personal data. This Policy applies in addition to our [Terms of Service](#). This Privacy Policy applies to all information collected through our websites, support mediums and channels and dashboards ("**Sites**") and any of our SaaS products ("**Services**") we offer (collectively referred to as "**Sites and Services**").

PLEASE READ THIS PRIVACY POLICY CAREFULLY.

AS AN END-USER OF NFTCDN, IT IS YOUR RESPONSIBILITY TO FAMILIARISE YOURSELF WITH THE CONTENTS OF OUR PRIVACY POLICY, AND TO CONFIRM THAT YOU UNDERSTAND AND AGREE TO OUR DATA COLLECTION AND USAGE PRACTICES. IF YOU DO NOT AGREE WITH THE CONTENT OF OUR PRIVACY POLICY, YOU MUST NOT USE OUR SITES AND SERVICES.

AS A CUSTOMER OF NFTCDN, IT IS YOUR OBLIGATION TO ENSURE THAT YOUR END-USERS ARE FULLY INFORMED ABOUT THE COLLECTION OF THEIR INFORMATION BY NFTCDN LTD AS A SAAS PROVIDER. FAILURE TO DO SO SHALL RESULT IN THE CUSTOMER BEING SOLELY RESPONSIBLE FOR ANY NON-COMPLIANCE WITH THE APPLICABLE DATA PROTECTION LAWS AND REGULATIONS, AND NFTCDN LTD SHALL NOT BE HELD LIABLE FOR ANY SUCH NON-COMPLIANCE. THIS INCLUDES, BUT IS NOT LIMITED TO, THE OBLIGATION TO INFORM END-USERS ABOUT OUR PRIVACY POLICY, THE NATURE OF DATA BEING COLLECTED AND HOW IT IS USED.

1. DEFINITIONS

1.1. The key terms that we use throughout this Policy are define below for ease:

"**Data**": means raw data or information that may or may not be personal information.

"**Data Controller**": under the Data Protection Act 2018, this is the organisation or person responsible for deciding how personal information is collected and stored and how it is used.

"**Data Processor**": a Data Controller may appoint another organisation or person to carry out certain tasks in relation to the personal information on behalf of, and on the written instructions of, the Data Controller.



"Personal Information": in this Policy, we refer to your personal data as "personal information". Personal Information means any information from which a living individual can be identified. It does not apply to information that has been anonymised.

"Special Information": certain very sensitive personal information requires extra protection under data protection law. Sensitive data includes information relating to health, racial and ethnic origin, political opinions, religious and similar beliefs, trade union membership, sex life and sexual orientation and also includes genetic information and biometric information.

- 1.2. **"Inactivity"**: pertains to a period of time for the duration of which the Sites has not been used by virtue of logging into an account.

2. LEGISLATIVE COMPLIANCE

- 2.1. For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018 ("**DPA**").
- 2.2. For users in the European Union, we adhere to the Regulation (E) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation ("**GDPR**").
- 2.3. Pursuant to Article 1 of the GDPR, the provisions of the GDPR generally only apply to the processing of personal data of natural persons. Accordingly, the processing of personal data of legal persons is only covered by the scope of the GDPR insofar as it relates to natural persons.
- 2.4. We are the Data Controller of the personal information we collect, hold and use about you, as explained in this Policy.
- 2.5. We do not have a Data Protection Officer as we do not fall within the categories of controllers and processors required to appoint a Data Protection Officer under Article 37 of the GDPR.
- 2.6. We do not fall within any of the categories of businesses for which the California Consumer Privacy Act ("**CCPA**") is applicable. Nonetheless, we encourage you to get in touch with us if you have any queries pertaining to your personal data.
- 2.7. Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

3. DATA COLLECTION

- 3.1. Details of data that we collect and hold about our Customer when they use our Sites:

Set out below are the general categories and details of retention periods in relation to those categories (See Section 8 for more



NFTCDN LTD – PRIVACY POLICY

details about retention) and in each case the types of data we collect, use and hold about our Customers when using our Sites.

General Category	Types of Personal Data in that Category	Retention Period
Identity Information	This is information relating to your identity such as your name	10+1 years from the end of the tax year to which the information relates
Contact Information	This is information relating to your contact details such as email address, billing addresses, telephone numbers	10+1 years from the end of the tax year to which the information relates
Account Information	This is information relating to your account with us (including authentication credentials) For Customers using Social Logins (e.g. Github or Gmail) we capture the information that you allow to be shared with us	Securely destroyed after 2 years of inactivity
Payment Information	This is information relating to the methods by which you provide payment to us such as bank account details, credit or debit card details, crypto payment details and details of any payments (including sums paid, IP address at time of payment, and dates) that are made between us.	10+1 years from the end of the tax year to which the information relates
Transaction Information	This is information relating to transactions between us such as details of the Services purchased and usage metrics per Project Account	10+1 years from the end of the tax year to which the information relates
Communication Information	This is information such as chats and logs thereof, emails, texts, call recordings, or any other type of artefact pertaining to discussions with us	As necessitated by our legitimate interests
Customer Confidential Information	This is information that you have shared with us that may be commercially sensitive	As dictated by individual consent and our



NFTCDN LTD – PRIVACY POLICY

		Terms
Survey and Research Information	This is information that we have collected from you or that you have provided to us in respect of surveys and feedback	As necessitated by our legitimate interests
Marketing and Advertising Information	This is information relating to your marketing and communications preferences	As dictated by individual consent
Website Usage Information	This is information about your use of our Sites and the technical data which we collect: • Requests linked to authentication • Requests linked to user products • Requests linked to usage • Requests linked to payments • Requests linked to keys management • Requests linked to authorised domains management • Requests linked to user settings • Time of request • Source IP address • User Agent	Securely destroyed after 7 days

3.2. Details of data that we collect and hold about the end-users of our Services:

Set out below are the general categories and details of retention periods in relation to those categories (See Section 8 for more details about retention) and in each case the types of data we collect, use and hold about the end-users of our Services:

General Category	Types of Data in that Category	Retention Period
Service Usage Information	This is information about use of our Services and the technical data which we collect: • API endpoint called • Query parameters • Host Name • Date/Time of request • Data transfer sizes • Referrer HTTP header • Source IP Address • User Agent • HTTP Response Status	Detailed usage records securely destroyed after 100 days from date of creation



- 3.3. We do not collect Special Information from our Customers or their end-users.
- 3.4. We do not collect information from our Customers or end-users relating to criminal convictions or offences.

4. DATA USAGE

- 4.1. We are only able to use your personal information for certain legal reasons set out in data protection law. There are legal reasons under data protection law other than those listed below; but, in most cases, we will use your personal information for the following legal reasons:
 - 4.1.1. **Contract Reason:** this is in order to perform our obligations to you under a contract we have entered into with you;
 - 4.1.2. **Legitimate Interests Reason:** this is where the use of your personal information is necessary for our (or a third party's) legitimate interests, so long as that legitimate interest does not override your fundamental rights, freedoms or interests;
 - 4.1.3. **Legal Obligation Reason:** this is where we have to use your personal information in order to perform a legal obligation by which we are bound; and
 - 4.1.4. **Consent Reason:** this is where you have given us your consent to use your personal information for a specific reason or specific reasons.
- 4.2. So that we are able to provide you with Services, we will need your personal information. If you do not provide us with the required personal information, we may be prevented from supplying the Services to you.
- 4.3. It is important that you keep your personal information up to date. If any of your personal information changes, please contact us as soon as possible to let us know. If you do not do this, then we may be prevented from supplying the services to you.
- 4.4. Where we rely on consent for a specific purpose as the legal reason for processing your personal information, you have the right under data protection law to withdraw your consent at any time.
 - 4.4.1. If you do wish to withdraw your consent, please contact us using the details set out in Section 10.
 - 4.4.2. If we receive a request from you withdrawing your consent to a specific purpose, we will stop processing your personal information for that purpose, unless we have another legal reason for processing your personal information – in which case, we will confirm that reason to you.



NFTCDN LTD – PRIVACY POLICY

- 4.5. We have explained below the different purposes for which we use your personal information and, in each case, the legal reason(s) allowing us to use your personal information. Please also note the following:
- 4.5.1. if we use the Legitimate Interests Reason as the legal reason for which we can use your personal information, we have also explained what that legitimate interest is; and
- 4.5.2. for some of the purposes, we may have listed more than one legal reason on which we can use your personal information, because the legal reason may be different in different circumstances. If you need confirmation of the specific legal reason that we are relying on to use your personal data for that purpose, please contact us using the contact details set out at the start of this privacy notice.

Purpose	Legal Reason(s) for using the data or personal information
To facilitate account creation and logging into our Sites	• Contract Reason • Legitimate Interest Reason: In order to provision our Services to you
To fulfil and manage your orders, which includes taking payment from you, advising you of any updates in relation to your order or any enforcement action against you to recover payment	• Contract Reason • Legitimate Interest Reason: In order to recover monies that you owe us
To manage our contract with you and to notify you of any changes	• Contract Reason • Legal Obligation Reason
To comply with audit, tax and accounting matters	• Legal Obligation Reason
For record keeping, including in relation to long-term contracts	• Contract Reason • Legitimate Interest Reason: For business, commercial, financial, technical and security purposes • Legal Obligation Reason
To request feedback	• Contract Reason • Legitimate Interest Reason: In order to improve and grow our business, including our website, and to understand needs, desires and requirements
To post testimonials	• Legitimate Interest Reason: In order to publicly share reviews of our Services



NFTCDN LTD – PRIVACY POLICY

	from you
To maintain and protect the security our Sites and Services	• Contract Reason • Legal Obligation Reason • Legitimate Interest Reason: In order to ensure the performance and safety of our Sites and Services
To send you marketing and promotional communications	• Consent Reason
To administer prize draws and competitions	• Consent Reason
To send administrative information to you, such as notice of maintenance, change in terms, conditions and policies, product and service updates	• Contract Reason
To enable user-to-user communications	• Legitimate Interest Reason: We may use your information in order to enable user-to-user communications with each user's consent.
To enforce our terms, conditions and policies	• Contract Reason • Legitimate Interest Reason: We may use data to ensure our Customers and end-users are not in breach of the terms, conditions and policies of our Sites and Services
To respond to legal requests	• Legal Obligation Reason
For other Business Purposes	• Legitimate Interest Reason: We may use data for other business purposes such as data analysis, trend identification, evaluation of promotional campaigns and for enhancement of our Sites, products, services, marketing and user experience.

4.6. Sometimes we may de-identify or anonymise personal information so that you can no longer be identified from it and use this for our own purposes. In addition, sometimes we may use some of your personal information together with other people's personal information to give us statistical information for our own purposes. Because this is grouped together with other personal information and you are not identifiable from that combined or aggregated data we are able to use this.

4.7. Under data protection laws, we can only use your personal information for the purposes we have told you about, unless we consider that the new purpose is compatible with the purpose(s) we told you about. If we



want to use your personal information for a different purpose that we do not think is compatible with the purpose(s) we told you about, then we will contact you to explain this and what legal reason is in place to allow us to do this.

5. DATA SOURCES

- 5.1. We usually collect Identity Information, Contact Information, Account Information, Payment Information, Transaction Information, Survey Information, Marketing Information, Website Usage Information and Service Usage Information directly from you when you fill out a form, survey or questionnaire, purchase our Services, use our Services, contact us by email, telephone, in writing or digitally, or otherwise. This includes the personal information that you provide to us when you subscribe to our mailing list enter a competition or survey.
- 5.2. We may receive some of your personal information from third parties or publicly available sources. This includes:
 - 5.2.1. Identity, Contact, Payment and Transaction Information from our Suppliers, Consultants, Contractors, Agents and Other Third-Party Vendors;
 - 5.2.2. Identity Information and/or Contact Information from publicly available sources;
 - 5.2.3. Website, Device and Technical Information from third parties such as analytics providers (like Google);
- 5.3. We may also receive Website, Device and Technical Information automatically from technologies such as cookies that are installed on our Sites.

6. DATA SHARING

- 6.1. We may need to share your personal information with other organisations or people. These organisations include:
 - 6.1.1. Other companies in our group (who may act as joint data controllers or as data processors on our behalf).
 - 6.1.2. Third parties who are not part of our group who are required to have access to data or personal information for the purposes described in Section 4. These may include:
 - 6.1.2.1. Suppliers, Consultants, Contractors, Agents and Other Third-Party Vendors such as, but not limited to: cloud hosting and infrastructure service providers, functionality service providers, design and development services, analytics services, CRM providers, customer and/or IT support services and providers, payment processors and payment service providers, debt collection agencies, administration providers and marketing agencies;



NFTCDN LTD – PRIVACY POLICY

- 6.1.2.2. Government bodies and regulatory bodies: such as HMRC and fraud prevention agencies;
- 6.1.2.3. Our advisors: such as lawyers, accountants, auditors and insurance companies;
- 6.1.2.4. Our bankers;
- 6.1.2.5. Credit Reference Agencies.
- 6.1.3. Any organisation that proposes to purchase or become part of our business in part or in whole by means such as but not limited to equity or share sale, financing, acquisition, merger, joint-venture, funding or sponsorship.
- 6.2. We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- 6.3. We may share your information with our business partners to offer you certain products, services or promotions.
- 6.4. Depending on the circumstances, the organisations or people who we share your personal information with will be acting as either Data Processors or Data Controllers. Where we share your personal information with a Data Processor, we will ensure that we have in place instructions that set out the responsibilities and obligations of us and them, including in respect of the security of personal information.
- 6.5. Unless explicitly stated in any section of this Policy, we do not sell or trade any of the personal information that you have provided to us.
- 6.6. We also use service providers to provide services and process your data. The service providers process the data exclusively on our instructions, are obliged to comply with the applicable data protection regulations, and are only provided data (by you directly or by us) to the extent and for the period of time listed in Section 3. By providing us your personal information when you use our Sites and Services, you hereby warrant that you accept the privacy policies of these third-party providers.
 - 6.6.1. [FormSpree](#) - For communications from you.
 - 6.6.2. [Mailchimp](#) - For communications to you.
 - 6.6.3. [Google Analytics](#) - For web and mobile analytics.
 - 6.6.4. [Stripe](#) - For invoice and billing.

7. DATA TRANSFERS



- 7.1. If any transfer of personal information by us will mean that your personal information is transferred outside of the United Kingdom and/or the European Economic Area (EEA), we will ensure that appropriate safeguards are in place so that a similar degree of protection is afforded to your personal information as is provided under applicable data protection laws (including the UK GDPR and/or EU GDPR, as relevant). We may need to transfer personal information outside of the United Kingdom and/or the EEA to other organisations within our group or to the third parties listed in Section 6 who may be located overseas.
- 7.2. The safeguards recognised under data protection laws for transferring personal information outside of the United Kingdom and/or the EEA include:
- 7.2.1. where the transfer is to a country or territory that has been approved as ensuring an adequate level of protection by the UK Government (for UK transfers) or by the European Commission (for EEA transfers);
 - 7.2.2. where personal information is transferred to another organisation within our group under an agreement covering this situation, which is known as binding corporate rules;
 - 7.2.3. having in place a standard set of clauses approved by the UK Information Commissioner's Office (ICO), such as the International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses, and/or by the European Commission in respect of the EU Standard Contractual Clauses;
 - 7.2.4. compliance with an approved code of conduct by a relevant data protection supervisory authority (in the UK, this is the Information Commissioner's Office (ICO));
 - 7.2.5. certification with an approved certification mechanism;
 - 7.2.6. in limited circumstances, reliance on specific derogations (exceptions) under data protection law, such as where you have explicitly consented to the transfer or where the transfer is necessary to perform a contract with you;
 - 7.2.7. or any other lawful transfer mechanism as may be recognised under applicable UK law (including mechanisms introduced under future reforms such as the UK Data Protection and Digital Information legislation).
- 7.3. We will monitor adequacy decisions and other legal developments relating to international data transfers and update this Policy as required. If you would like more information about the specific safeguards we rely upon when transferring your personal information outside of the United Kingdom and/or the EEA, please contact us using the details set out in Section 15.

8. DATA RETENTION



- 8.1. We will only hold your personal information for as long as is necessary. How long is necessary will depend upon the purposes for which we collected the personal information (see Section 3) and whether we are under any legal obligation to keep the personal information (such as in relation to accounting or auditing records or for tax reasons). We may also need to keep data or personal information in case of any legal claims, including in relation to any guarantees or warranties that we have provided with the Services.
- 8.2. We have set out above the details of our retention periods for different types of data. You can find them in Section 3.

9. AUTOMATED DECISION MAKING

- 9.1. "Automated decision making" is where a decision is automatically made without any human involvement. Under data protection laws, this includes profiling. 'Profiling' is the automated processing of personal data to evaluate or analyse certain personal aspects of a person (such as their behaviour, characteristics, interests and preferences).
- 9.2. Data protection laws place restrictions upon us if we carry out any automated decision making (including profiling) that produces a legal effect or similarly significant effect on you.
- 9.3. We do not carry out any automated decision making (including profiling) that produces a legal effect or similarly significant effect on you. If we do decide to do this then we will notify you and we will inform you of the legal reason we are able to do this.

10. YOUR RIGHTS UNDER DATA PROTECTION LAW

- 10.1. Under data protection laws, you have certain rights in relation to your personal information, as follows:
- 10.1.1. Right to request access: (this is often called 'subject access'). This is the right to obtain from us a copy of the personal information that we hold about you. We must also provide you with certain other information in response to these requests to help you understand how your personal information is being used.
- 10.1.2. Right to correction: this is the right to request that any incorrect personal data is corrected, and that any incomplete personal data is completed.
- 10.1.3. Right to erasure: (this is often called the 'right to be forgotten'). This right only applies in certain circumstances. Where it does apply, you have the right to request us to erase all of your personal information.
- 10.1.4. Right to restrict processing: this right only applies in certain circumstances. Where it does apply, you have the right to request us to restrict the processing of your personal information.



- 10.1.5. Right to data portability: this right allows you to request us to transfer your personal information to someone else.
- 10.1.6. Right to object: you have the right to object to us processing your personal information for direct marketing purposes. You also have the right to object to us processing personal information where our legal reason for doing so is the Legitimate Interests Reason (see Section 4) and there is something about your particular situation that means that you want to object to us processing your personal information. In certain circumstances, you have the right to object to processing where such processing consists of profiling (including profiling for direct marketing).
- 10.2. In addition to the rights set out in Section 10.1, where we rely on consent as the legal reason for using your personal information, you have the right to withdraw your consent.
- 10.3. If you want to exercise any of the above rights in relation to your personal information, please contact us using the details set out in Section 15. If you do make a request, then please note:
 - 10.3.1. we may need certain information from you so that we can verify your identity;
 - 10.3.2. we do not charge a fee for exercising your rights unless your request is unfounded, repetitive or excessive;
 - 10.3.3. if we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request;
 - 10.3.4. if your request is unfounded or excessive or your identity cannot be validated, then we may refuse to deal with your request.
- 10.4. Pursuant to Section 10.3;
 - 10.4.1. Making a verifiable request does not require you to create an account with us.
 - 10.4.2. We may need to follow up with third parties to validate any information you have provided to us and as such any information that you provide may be required to be disclosed for the purposes of validation.
 - 10.4.3. If you choose to exercise your right to opt out through an authorised agent, we reserve the right to deny the request if the agent fails to provide satisfactory evidence demonstrating their valid authorization to act on your behalf.

11. **MINORS**



NFTCDN LTD – PRIVACY POLICY

- 11.1. Our Sites and Services are not intended for use by children under the age of 18, and we do not knowingly collect or solicit personal data from such individuals.
- 11.2. By using our Sites and Services, you represent and warrant that you are at least 18 years of age.
- 11.3. If you believe that we may have collected personal information from a child under 18 years of age, please contact us immediately using the details set out at the beginning of this notice so that we may take appropriate action.

12. MARKETING

- 12.1. You may receive marketing from us about similar goods and services, where either you have consented to this, or we have another legal reason by which we can contact you for marketing purposes.
- 12.2. However, we will give you the opportunity to manage how or if we market to you. In any email that we send to you, we provide a link to either unsubscribe or opt out, or to change your marketing preferences. To change your marketing preferences, and/or to request that we stop processing your personal information for marketing purposes, you can always contact us on the details set out at the beginning of this notice.
- 12.3. If you do request that we stop marketing to you, this will not prevent us from sending communications to you that are not to do with marketing (for example in relation to services that you have purchased from us).
- 12.4. We do not pass your personal information on to any third parties for marketing purposes.

13. COMPLAINTS

- 13.1. If you are unhappy about the way that we have handled or used your personal information, you have the right to complain to the UK supervisory authority for data protection, which is the Information Commissioner's Office (ICO). Please do contact us in the first instance if you wish to raise any queries or make a complaint in respect of our handling or use of your personal information, so that we have the opportunity to discuss this with you and to take steps to resolve the position. You can contact us using the details set out at the beginning of this privacy notice.

14. THIRD-PARTY WEBSITES

- 14.1. Our website may contain links to third-party websites. If you click and follow those links, then these will take you to the third-party website. Those third-party websites may collect personal information from you, and you will need to check their privacy notices to understand how your personal information is collected and used by them.



15. COOKIES

- 15.1. Our Sites use cookies and similar technologies. Cookies are small text files placed on your device to help us operate our Sites, enhance functionality, analyse usage, and personalise your experience.
- 15.2. We use the following categories of cookies on our Sites:
 - 15.2.1. Strictly necessary cookies - required for the operation of our Sites (for example, authentication and security).
 - 15.2.2. Functionality cookies - to remember your preferences and settings.
- 15.3. In addition to the cookies we set directly, certain trusted third parties may place cookies on your device when you use our Sites. These cookies are controlled by the third party and are subject to their own policies. We do not control the use of these cookies.
 - 15.3.1. Stripe (payments) - When you make a payment through our Sites, Stripe may place cookies to operate its services, enable secure transactions, and help prevent fraud. For more information, see [Stripe's Cookie Policy](#) and [Privacy Policy](#).
 - 15.3.2. Google Analytics (analytics) - We use Google Analytics to help us understand how visitors use our Sites. Google may set cookies to collect usage and performance data. For more information, see [Google's Privacy Policy](#).
 - 15.3.3. Mailchimp (email campaigns) - If you sign up for our mailing list, Mailchimp may place cookies to support subscription forms and measure campaign performance. For more information, see [Mailchimp's Privacy Policy](#).

16. CONTACT INFORMATION

- 16.1. Should you have any questions or concerns regarding our Privacy Policy or practices, please do not hesitate to contact us at support@nftcdn.io.