

# GovGen Website Privacy Policy

*Last updated: February 26, 2024*

This Privacy Policy (the “Policy”) governs your use of the website at [www.govgen.io](http://www.govgen.io), the associated tools and services, and any public source code repository offered by the operator of this site (collectively, the “Services”). All in Bits (AiB), Inc., a Delaware corporation, operates the Services. AiB and its affiliates are referred to in this document as the “operator,” “we,” or “us.” The Services do not include outside websites or platforms which may be linked or interconnected to the Services. Such outside platforms may have their own privacy policy, which controls all transactions on such platforms.

If you do not want us to collect, use, or disclose your personal data in the ways described in this policy, please do not use or otherwise interact with the Services, provide us with your personal data, or authorize any third party to make your personal data available to us. By using or interacting with the Services, you acknowledge that you understand that we may use your personal data as described in this policy. Please note, as described in this policy, we may receive your personal data from third parties that have not expressly told you that they will provide your personal data to us. If you have any questions about how we collect, use, protect, or disclose your personal data in connection with our platform, please contact us by email at [legal@allinbits.com](mailto:legal@allinbits.com).

## **The Blockchain**

Blockchain technology, also known as distributed ledger technology (or simply ‘DLT’), is at the core of our business. Blockchains are decentralized and made up of digitally recorded data in a chain of packages called ‘blocks’. The manner in which these blocks are linked is chronological, meaning that the data is very difficult to alter once recorded. Since the ledger may be distributed all over the world (across several ‘nodes’ that usually replicate the ledger), this means there is no single person making decisions or otherwise administering the system (such as an operator of a cloud computing system), and that there is no centralized place where it is located either.

This means that by design, a blockchain’s records cannot be changed or deleted and are said to be ‘immutable’. This may affect your ability to exercise your rights, such as your right to erasure (‘right to be forgotten’), or your rights to object or restrict processing of your personal data. Data on the blockchain can’t be erased or changed. Although smart contracts may be used to revoke certain access rights, and some content may be made invisible to others, it is not deleted.

In certain circumstances, in order to comply with our contractual obligations to you (such as the delivery of tokens), it will be necessary to write certain personal data, such as your wallet address, onto the blockchain; this requires you to execute such transactions using your wallet’s private key.

In most cases ultimate decisions to (i) transact on the blockchain using your wallet address, as well as (ii) share the public key relating to your wallet address with anyone (including us) rests with you.

If you want to ensure your privacy rights are not affected in any way, you should not transact on blockchains as certain rights may not be fully available or exercisable by you or us due to the technological infrastructure of the blockchain. The blockchain is available to the public, and any personal data shared on the blockchain will become publicly available.

## **Individuals Under the Age of 18**

In accordance with our Terms of Service, individuals under the age of 18 are not permitted to use the Services. As such, we do not knowingly collect, solicit or maintain personal data from anyone under the age of 18 or knowingly allow such persons to register for the Services.

In the event that we learn that we have collected personal data from an individual under the age of 18, we will use commercially reasonable efforts to delete that information from our database. Please contact us if you have any concerns. If you are a parent or guardian and you are aware that your child has provided personal data to the Services, please contact us so that we may remove such data. Note that we cannot delete information stored on public cryptographic blockchains.

## **What Personal Data We Collect**

Depending on the nature of your interactions with us and how you use the Services, we and the vendors we hire may collect some or all of the following personal data:

- **Information and content you provide.** We collect the content, communications, and other information you provide when you use our Services, including when you create an account, request to become a validator, initiate the use of the Services, create or share content, and message or communicate with others. This information may include, but is not limited to:
  - Name
  - Address
  - Email
  - Phone Number
  - SSN (or equivalent)
  - Financial Information
  - Date of Birth

- Citizenship
- Payment Information
- **Information used to verify your identity.** If required to help us verify your identity, you may be asked to provide us with a copy of your driver's license, passport, or other government-issued ID. If required to help us verify your residence, you may be asked to provide us with a utility bill, lease or other proof of residence. You may also be asked to provide us with other verification documents, such as bank statements reflecting the source of funds, to meet U.S. Bank Secrecy Act or anti-money laundering laws, US Treasury Department rules or regulations, or other legal requirements. If you seek to invest through an entity or corporation, you may be asked to provide us with documentation relating to the entity's jurisdiction of formation, legal status, and ownership. By providing the verification information and documents mentioned above, you also provide us with information contained within those records, which may include characteristics of protected classifications like your sex, age, national origin, and citizenship.
- **Financial information.** In order to transfer funds, you may need to provide us and our third-party financial providers or partners with certain account and other payment information, such as information needed to make payment via ACH, wire, electronic checks, cryptocurrency, foreign currency, or any other payment methods. You may agree to your personal and financial information being transferred, stored, and processed by such third parties in accordance with their respective privacy policies.
- **Your usage.** We collect information about how you use our Services, such as the types of content you view or engage with; the features you use; the actions you take; the people or accounts you interact with; and the time, frequency, and duration of your activities.
- **Information about transactions made on our Services.** If you use our Services for transactions of any kind, we collect information about them.
- **Things others do and information they provide about you.** We also receive and analyze content, communications, and information that other people provide when they use our Services.

## Cookies

We and our partners use cookies and similar tracking tools and technologies when you interact with our Services. We use cookies to remember you, to help provide basic website functionality, and to conduct analytics about your use of the Services. If you have an account with the Services, we may link this usage data with other information we have about you. BY adjusting your browser's cookie settings, you may have the option to either accept or refuse non-essential cookies. If you choose to refuse, you may not be able to use some portions of the Services.

## Device Information

As described below, we collect information from and about the computers, phones, and other web-connected devices you use that interact with our Services, and we combine this information across different devices you use.

Information we obtain from these devices includes:

- **Device attributes:** information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.
- **Device operations:** information about operations and behaviors performed on the device, such as whether a window is foregrounded or backgrounded, or mouse movements (which can help distinguish humans from bots).
- **Identifiers:** unique identifiers, device IDs, and other identifiers. Data from device settings: information you allow us to receive through device settings you turn on, such as access to your GPS location, camera, or photos.
- **Network and connections:** information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address, connection speed, and, in some cases, information about other devices that are nearby or on your network.
- **Cookie data:** data from cookies stored on your device, including cookie IDs and settings.
- **Information necessary to enable push notifications:** if you enable push notifications in our services, we will collect information from your device as may be necessary to enable such notifications.

## When Using the Services

When using the Services, we may collect and process personal data. The data will be stored in different instances. We collect and use this information to provide you the Services and to debug issues, and provide support.

On the Blockchain, the following data may be stored:

- addresses of externally owned accounts
- transactions made; and
- token balances.

**The data will be stored on the Blockchain. Given the technological design of the blockchain, this data will become public, and it will not likely be possible to delete or change the data at any given time.**

In our web servers, we will store the following data:

- addresses of externally owned accounts; and
- transactions made.

Log Data

- the Internet protocol address (“IP address”); and
- transaction-id/Hash.

## **How We Use Personal Data**

We use your personal data as described below and to provide and support the Services. Here’s how:

### **Provide, personalize, and improve our Services.**

We use personal data to deliver our Services, including to personalize features and content.

- **Information across devices:** We connect information about your activities on different devices to provide a more tailored and consistent experience.
- **Location-related information:** We use location-related information such as your current location, where you live, the places you like to go, and the businesses and people you’re near to provide, personalize and improve our Services.
- **Product research and development:** We use the information we have to develop, test and improve our Services, including by conducting surveys and research, and testing and troubleshooting new products and features.
- **Ads and other sponsored content:** We use the information we have about you – including information about your interests, actions, and connections – to select and personalize ads, offers, and other sponsored content that we show you.

### **Provide measurement, analytics, and other business services.**

The Services use third-party analytics tools to gather information about their use. These third-party analytics tools collect information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. The Services use the information we get from third-party analytics providers to improve this site.

### **Promote safety, integrity, and security.**

We use the information we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Services, and promote safety and security.

### **Communicate with you, including for marketing purposes.**

We use the information we have to send you marketing communications, communicate with you about our Services, and let you know about our policies and terms. We also use your information to respond to you when you contact us.

### **We Share Your Personal Data**

We may share your personal data with others as follows:

- We may post or re-post your public social media comments or content.
- We engage vendors and service providers to perform functions on our behalf, such as service providers that assist in the administration of the Services and our advertising and marketing efforts, identity verification services, data analytics companies, marketing partners, and payment providers.
- We may also transfer your personal data to a third party as a result of a business combination, merger, asset sale, reorganization or similar transaction or to governmental authorities when we reasonably believe it is required by law or appropriate to respond to legal process.
- We will also share your information with third-party companies, organizations or individuals if we have a good faith belief that access, use, preservation or disclosure of your information is reasonably necessary to detect or protect against fraud or security issues, enforce our terms of use, meet any enforceable government request, defend against legal claims or protect against harm our legal rights or safety.
- To operate the Services, we share information about you as needed with our service providers, including financial institutions, accountants, auditors, lawyers, payment processors, information technology consultants, advisors, and our affiliates.
- We routinely share information with companies closely related to us – our “affiliates” – for certain purposes under this policy. Our affiliates will be entitled to enjoy our rights under this Privacy Policy, and we will be responsible for our affiliates’ conduct related thereto.
- We may share information about you with US, state, or international regulators, SEC, or FINRA where we believe doing so is required or appropriate to comply with any

laws, regulations, or other legal processes or law enforcement requests, such as court orders, search warrants, or subpoenas.

## **Third-Party Links and Sites**

The Services may contain links to third-party websites and may redirect you to third-party websites. These sites include, among others, service providers who have a relationship with the operator. Third-party websites are not under our control, and we are not responsible for any third-party websites, or the accuracy, sufficiency, correctness, reliability, veracity, completeness, or timeliness of their information, links, changes, or updates. The inclusion or access to these websites does not imply an endorsement by the operator, or of the provider of such content or services, or any third-party website. Please be aware that when you enter a third-party website, any information you provide, including financial information, is subject to the terms of use and privacy policy of that website.

## **Retention**

The Services may keep the information we gather about you for as long as reasonably necessary to operate the Services.

To request that information collected about you be deleted, please contact us at the email provided in this policy. A valid request must include sufficient information to identify your personal data. Note that we cannot delete information stored on public cryptographic blockchains.

## **Your Choices**

If you wish to stop receiving marketing or promotional communications, please follow the opt-out instructions in the relevant communication, such as clicking “Unsubscribe” (or similar opt-out language), in those communications. Despite your indicated preferences for marketing emails, we may continue to send you service-related communications, including notices of any updates to our terms of service or this policy. Please understand that you will not be allowed to opt-out of certain communications required to comply with applicable laws, rules, and regulations or other legal and related notices concerning your relationship to the Services.

## **How Do We Protect Your Personal Data?**

We implement measures designed to protect the personal data that we collect and store about you. However, despite this, we cannot guarantee the security or integrity of any information shared with us or transmitted over the Internet.

## **Contact Us**

If you have comments or questions about the privacy policies of the Services, please contact us at [legal@allinbits.com](mailto:legal@allinbits.com).

## **Changes to This Privacy Policy**

The Services may change its privacy policy at any time. Check this page for the latest.

## **Third-Party Data Collection and Interest-Based Advertising**

Third parties may collect or receive certain information about you and/or your use of the Services to provide content, ads (including personalized ads), or functionality or to measure and analyze ad performance in or through the Services.

You may choose to stop receiving personalized (also known as targeted) advertising from participating ad networks, audience segment providers, ad-serving vendors, other service providers, or entities by opting out at the websites operated by the [Network Advertising Initiative](#) and [Digital Advertising Alliance](#) or if you are a user in the European Economic Area, [Your Online Choices](#). We adhere to the Self-Regulatory Principles for Online Behavioral Advertising.<sup>[LL1]</sup> [CP2]