

Privacy Policy

At OAMO INC. ("**Oamo**", "**we**", "**us**" or "**our**"), we are on a mission to empower you as the sole owner of your data and to help you unlock its true value. We believe that your data should always be yours to own, control, and benefit from., and we make this possible through our decentralized platform: <https://www.oamo.io/#solutions> (hereinafter the "**Platform**").

As a decentralized data broker, we collect, use and disclose data, including personal information, de-identified data and anonymized data, in order to offer you the services of our Platform. Our platform's main objective is to empower you to own and monetize the value of your personal information, and to build relationships with companies that interest you, while remaining anonymous. Your privacy and anonymity are the cornerstones of our vision and business model.

This *Privacy Policy* (the "**Policy**") is intended to help you understand our practices regarding the collection, use, disclosure and retention of your personal information. By providing us with personal information through our Platform or by communicating with us, you agree to its processing as set forth in this *Privacy Policy*, and you authorize Oamo, its third parties and service providers to process your personal information for the purposes set forth below. Unless otherwise specified, Oamo is the "*data controller*" of the personal information you provide to us.

If you do not consent to Oamo collecting, using and/or disclosing your personal information in accordance with this Policy, please do not provide it to us. However, we may not be able to offer you all the services of our Platform without the necessary personal information.

You may withdraw your consent at any time by contacting our Privacy Officer using the contact information provided in the "How to contact us" section.

1. What personal information do we collect?

When you use our Platform and communicate with us, we collect certain personal information about you.

We may collect and process different types of personal information while providing our services and operating our business, including:

- information relating to your digital identity, such as your DID (unique anonymous decentralized identifier) and your public virtual wallet addresses (encrypted);
- information about your activities on our Platform, such as the data pools in which you have participated, the rewards you have earned and the pools for which you are eligible;
- information relating to marketing and communication preferences, such as personalized offers you receive;

- information about your use of the Platform and other technical information, such as your interaction with our online content, or information collected through analytics technologies;
- any other personal information you provide.

We may also process personal information, provided directly by you and processed with your consent, in connection with our services and activities that we do not retain, but instead de-identify or anonymize, including:

- information extracted from your social networks, such as your location, gender, age and behaviour or characteristics on said social networks;
- information extracted from your web3 activities, such as your transaction history and holdings (*on-chain activity and holdings*).

Any other personal information you provide to us will be treated in accordance with this Policy. If you provide us with personal information about other individuals, you must notify them and obtain their consent.

We do not knowingly collect information from children under the age of 14. If you are a minor under the age of 14, please do not provide us with any personal information without the express consent of a parent or guardian.

2. How do we collect personal information?

We collect your personal information directly from you and during our interactions with you, as well as during your interactions with our Platform, subject to the data that you freely decide to transmit to us.

The Platform includes a profiling functionality for individuals who provide their personal information. This functionality cannot be deactivated, as it is the essence of the Platform.

3. How do we use personal information?

We use your personal information to fulfill the objectives of our Platform and to provide and improve our services to you, including:

- to deliver the products and services you have requested;
- to generate generic categories of characteristics or behaviors (called *Credentials*);
- to depersonalize them;
- to anonymize them for serious and legitimate purposes;
- to determine your eligibility for data pools and rewards - this decision is based exclusively on automated processing of the information you provide;

- to allow you to share certain de-identified or anonymized data points, at your discretion;
- to allow you to monetize this de-identified or anonymized data, at your discretion;
- to enable you to receive rewards;
- for marketing and business development purposes – to enable you to receive personalized offers and notifications;
- to operate our business and provide our services;
- for research and development – to carry out analyses to better understand our customers' service and marketing needs, and to better develop our offers and services;
- to respond to inquiries or other requests from visitors on our websites;
- for any other compatible secondary purpose;
- for other purposes, with your consent or in accordance with applicable laws.

We may also use them to comply with our legal and regulatory obligations.

4. With whom do we share personal information?

We only communicate de-identified or anonymized, aggregated information that does not directly or indirectly identify any individual to our customers and partners, on behalf of our users who have decided to opt-in to a data pool, in accordance with the terms and conditions related to said data pool.

However, third-party service providers and/or partners who provide us with website, application development, hosting, or other services may have access to personal information or process it in connection with the services they provide to us. In such cases, they are contractually bound to keep your data confidential and to comply with privacy laws.

We may need to disclose personal information to comply with a legal obligation or to enforce our rights, including to government authorities and law enforcement agencies where required by applicable law. However, we do not store information that would allow correlation between a DID and connected social profiles or wallets in our databases, nor can we identify an individual user behind a DID.

We will only use personal information for the primary purposes and applicable legitimate purposes for which it was collected, or for purposes consistent with the primary purposes.

Our use and transfer to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

5. Where do we store personal information?

Given the decentralized nature of our Platform, our operations are supported by a global network of servers, computers, blockchains and other infrastructure and information technologies.

We and our service providers process and store your personal information primarily in Canada, the United States and the European Union, as well as in other jurisdictions. If required by law or court order, the authorities of that country may be able to access certain personal information.

6. How long do we keep personal information?

We will retain personal information only for as long as necessary for the purposes set out in this Policy and to comply with our legal and regulatory obligations.

We cannot destroy personal information stored on decentralized networks. Therefore, we are committed to securely encrypting this information, without creating a decryption key, to make it completely inaccessible to anyone.

In the event of a user's inactivity on the Platform for at least one year, all their data will be automatically encrypted, without creating a decryption key, and will become completely inaccessible for the future.

To find out more about how long we keep personal information, please contact us as set forth in the "How to contact us" section.

7. How do we protect personal information?

We follow generally accepted industry best-practices and standards to protect the information transferred to us. We maintain appropriate physical, technical, logical, and administrative safeguards, proportional to the sensitivity of the personal information, to protect it from unauthorized disclosure or access, accidental or unlawful alteration, loss or destruction, misuse, or other unlawful form of processing of the personal information in our possession.

Our staff members are bound by a duty of confidentiality. They only have access to your personal information in an anonymized or de-identified form, on a "need-to-know" basis or if reasonably required by their duties.

Given the inherent risks of data transmission over the Internet, we are not responsible for data in transit and cannot be held liable for any misappropriation, interception, modification, deletion, destruction, or use of data provided through our Platform.

If you have reason to believe that any personal information has been compromised, please contact us as set forth in the "How to contact us" section.

8. What are your rights regarding your personal information?

Under certain circumstances and in accordance with applicable data protection laws, you have the following rights:

- access: to ask whether we hold personal information about you and the right to access that information;
- rectification: to request rectification of any incomplete or inaccurate personal information we hold about you;
- withdrawal of consent: to withdraw your consent to the disclosure or use of personal information collected;
- destruction request: to request the destruction of the personal information we hold about you;
- request for information: the right to request certain information relating to decisions based exclusively on the automated processing of personal information.

9. How to contact us

If you have any questions or comments about this *Privacy Policy* or your personal information, or if you wish to exercise your rights, file a complaint or obtain information about our policies and practices, please contact our Privacy Officer by e-mail at privacy@oamo.io or by mail at the following address:

OAMO

To the attention of the Privacy Officer
1822 Sherbrooke St. W., Suite 100,
Montreal, Quebec, H3H 1E4

10. How do we update this Policy?

This Policy may be amended or updated from time to time without prior notice. The collection, use, disclosure, and processing of your personal information by Oamo are governed by the current version of this Policy.

Last update: November 2023.