

Codex Testnet Privacy Policy

This Privacy Policy is intended to inform you about, among other things, the personal data we collect and process, our approach to that collection and processing, and your rights when you participate in the Codex Testnet Programme as referred to in the Codex Testnet Terms and Conditions.

In this regard, if you are participating in the Codex Testnet Programme, then this Privacy Policy applies to you.

1. Who we are

For the purposes of this Privacy Policy and the collection and processing of personal data as a controller, the relevant entity is IFT Studio Pte Ltd., a company duly organised and registered under the laws of Singapore, having its registered office at 160 Robinson Road, #24-09 Singapore 068914.

Whenever we refer to “IFT”, “we”, “us” or any other similar references, we are referring to IFT Studio Pte Ltd.

2. We limit the collection and processing of personal data from your participation in the Codex Testnet Programme.

We aim to limit the collection and collection and processing of personal data from participants in the Codex Testnet Programme. We only collect and process certain personal data for specific purposes and where we have the legal basis to do so under applicable data protection law. We will not collect or process any personal data that we don't need and where we do store any personal data, we will only store it for the least amount of time needed for the indicated purpose.

In this regard, we collect and process the following personal data as a result of your participation in the Codex Testnet Programme:

- **Wallet address:** In order to provide you Codex Testnet Tokens and facilitate your participation in the Codex Testnet Programme, we may collect and process your wallet address. While pseudo anonymous, your wallet address could be linked to your identity. As such, we will treat it as personal data and use it solely for the purposes of managing your involvement in the Codex Testnet. We will not use your wallet address for any other purpose, nor share it with third parties, except as required by law. Your wallet address will only be retained for as long as necessary to fulfil these purposes.

3. Third party processing of personal data

In addition to our limited collection of personal data, third parties may collect or process your personal data as part of your participation in the Codex Testnet Programme, particularly when we use their services to facilitate your participation. When you interact with these third parties, their respective privacy policies will govern the collection and use of your data. We encourage you to review these privacy policies to understand how your personal data may be handled by these third parties.

4. Security measures we take

As a general approach, we take data security seriously and we have implemented a variety of security measures to maintain the safety of your personal data when you submit such information to us.

5. Exporting personal data outside Singapore

We are obliged to protect the privacy of personal data that you may have submitted in the unlikely event that we export your personal data to places outside Singapore. This means that personal data will only be processed in countries or by parties that provide an adequate level of protection comparable to the relevant data protection laws in Singapore. Otherwise, we will use other forms of protections, such as specific forms of contractual clauses to ensure such personal data is provided the same protection as required under such legislation. In any event, the transmission of personal data outside Singapore will always occur in conformity with applicable data protection laws.

6. Your choices and rights

As explained in this Privacy Policy, we limit our collection and processing of your personal data wherever possible. Nonetheless, you still have certain choices and rights in respect of the personal data which we do collect and process. As laid out in relevant privacy legislation, you have the right to:

- Ask us to correct or update your personal data (where reasonably possible);
- Ask us to remove your personal data from our systems;
- Ask us for a copy of your personal data, which may also be transferred to another data controller at your request;
- Withdraw your consent to process your personal data (only if consent was asked for a processing activity), which only affects processing activities that are based

on your consent and doesn't affect the validity of such processing activities before you have withdrawn your consent;

- Object to the processing of your personal data; and
- File a complaint with the Personal Data Protection Committee of Singapore (PDPC), if you believe that your personal data has been processed unlawfully.

7. This Privacy Policy might change

We may modify or replace any part of this Privacy Policy at any time and without notice. Please check the Privacy Policy periodically for any changes. The new Privacy Policy will be effective immediately upon its posting.

8. Contact information

To the extent that you have any questions about the Privacy Policy, please contact us at legal@free.technology.

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