

## PRIVACY POLICY

Effective Date: July 3<sup>rd</sup>, 2024

Navigate Foundation, LTD (the “Company”, “we”, “us”, or “our”) is committed to protecting your privacy. This Privacy Policy describes the types of Personal Information (as defined below) that we may collect from you or that you may provide when you visit our website at <https://nvg8.io/>, use our services, or otherwise interact with us (collectively, the “Services”). This Privacy Policy also describes our practices for using, maintaining, protecting, and disclosing that Personal Information. Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your Personal Information with us.

### WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL INFORMATION?

The data controller for the purposes of processing Personal Information in the context of our Services is Navigate Foundation, LTD, located at:

1 Irving Place #08-11  
The Commerze@Irving  
Singapore (369546)

Questions, comments, and requests regarding our Privacy Policy may be addressed to us at [info@nvg8.io](mailto:info@nvg8.io).

### WHAT TYPES OF PERSONAL INFORMATION DO WE PROCESS?

In this Privacy Policy, we use the term “Personal Information” to refer to information that can be used to identify you.

When you interact with our Services, we may collect certain Personal Information directly from you or automatically from the devices you use to access our Services.

Depending on how you use our Services, we may collect the following types of information from you:

Type of data	Examples of data
Identification data	First name, last name
Contact information	Email address
Registration data	Newsletter requests, login information

<b>Financial information</b>	Crypto wallet address
<b>Transaction data</b>	Data about transactions you make, such as date and number of tokens
<b>Photographs, Video, and Other Media</b>	Location information and images
<b>Data related to your communications with us</b>	Subject, content, and date and time of your communications with us or your use of our online services (including identification data and contact information)

The website also automatically collects the following Personal Information *via* cookies and other automatic collection technology:

Type of data	Examples of data	Purposes
<b>Internet or other electronic network activity information</b>	Date and time of the visit, IP address, device type, browser type, operating system, viewed pages, system configuration data, location based on IP address, telephone number, contact information	This data is necessary for the proper functioning of the website, as well as internal business analytics purposes such as audience measurement. For more information on cookies and other trackers, please see the <a href="#">Cookies Policy [LINK]</a> of the website.
<b>Metadata of media you submit</b>	Date image or footage was captured, location where image or footage was captured, camera settings, image metrics	The data is used to validate media you submit and to develop and maintain Navigate Maps and other services we provide.

The provision of certain types of Personal Information may be necessary depending on the services you wish to receive. We will inform you if providing Personal Information is mandatory. If you refuse to provide Personal Information that is mandatory, you may not be able to use or access all parts of the Services.

## FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL INFORMATION?

We process your Personal Information for the following purposes and corresponding legal basis/bases:

Purpose	Legal Basis
<p>Providing the Services (e.g., using the images and footage you submit to develop Navigate Maps or using your crypto wallet information to transmit tokens to you).</p>	<ul style="list-style-type: none"> <li>• Performance of/preparing to enter into a contract with you</li> <li>• Our legitimate interests in providing the Services</li> </ul>
<p>Managing our relationship with you (e.g., responding to your messages, communicating administrative or transactional information about the Services to you, or providing customer support).</p>	<ul style="list-style-type: none"> <li>• Performance of/preparing to enter into a contract with you</li> <li>• Our legitimate interest in building and maintaining the Services</li> </ul>
<p>Protecting the Services and defending our rights, including investigating, preventing, or taking pre-litigation or litigation actions regarding potential violations of our terms or policies, suspected fraud, situations involving potential threats to the safety of any person, and illegal activities.</p>	<ul style="list-style-type: none"> <li>• Performance of/preparing to enter into a contract with you</li> <li>• Compliance with a legal obligation</li> </ul>
<p>Improving our Services and your experience (e.g., using data about how you interact with the Services to improve the structure and content of the Website).</p>	<ul style="list-style-type: none"> <li>• Our legitimate interests in optimizing the Services and your experience</li> </ul>
<p>Complying with legal obligations to which we are subject.</p>	<ul style="list-style-type: none"> <li>• Compliance with a legal obligation</li> </ul>

<p>Offering information or promotional materials about our products and services. If you do not wish to have your email and contact information used by the Company to promote our products or services, you can opt-out by clicking “unsubscribe” on the email communication you received or by sending an email to <a href="mailto:info@nvg8.io">info@nvg8.io</a>.</p>	<ul style="list-style-type: none"> <li>• Our legitimate interests in marketing to you if you are an existing client/Consent if you are not an existing client</li> </ul>
<p>Facilitating a sale, merger, consolidation, or other corporate transaction (i.e., transferring or assigning to third parties involved in a corporate transaction information concerning your relationship with us, including, without limitation, Personal Information that you provide and other information concerning your relationship with us).</p>	<ul style="list-style-type: none"> <li>• Our legitimate interests in transferring our business or assets</li> </ul>

For questions or additional information regarding our purposes and legal bases for processing your Personal Information, please contact us at [info@nvg8.io](mailto:info@nvg8.io).

**HOW DO WE DISCLOSE YOUR PERSONAL INFORMATION?**

We may transmit each of the types of Personal Information identified in the “What Types of Personal Information Do We Process?” section above to the following recipients when you access, browse, navigate and/or use the Services:

Recipients	Purposes
<p><b>Our Service Providers</b></p>	<p>To help manage and provide our Services, including providing cloud hosting and storage services.</p>
<p><b>Administrative or Judiciary Authorities or Other Third Parties as Compelled or Permitted by Law</b></p>	<p>To respond to a compelled subpoena, court order, or other legal process or government request; in case of an alleged violation of legal or regulatory provisions; or to establish or protect our legal rights or those of others.</p>

<p><b>Professional Advisors, including Lawyers, Auditors, and Related Parties</b></p>	<p>To assist with technical, financial, or legal obligations or in connection with audits or transactions.</p>
<p><b>Buyer or Other Successor</b></p>	<p>To complete a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.</p>

**HOW DO WE HANDLE INTERNATIONAL TRANSFERS OF YOUR PERSONAL INFORMATION?**

We are a global business and the the information that we collect about you may be transferred to and stored in countries globally, including the United States, and shared with third parties in countries including the United States. If you are located in the European Economic Area (“EEA”) or United Kingdom (“UK”) and we transfer your Personal Information to third parties in other countries that do not provide adequate legal protection for the processing of Personal Information, we will ensure that appropriate safeguards are implemented to secure such data transfers in compliance with applicable data protection laws, such as the EEA or UK Standard Contractual Clauses. For more information about the safeguards adopted by the Company, contact us at [info@nvg8.io](mailto:info@nvg8.io).

## **HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?**

We will retain your Personal Information for as long as necessary for the purposes disclosed in this Privacy Policy, unless required by our legal obligations to retain it for longer. To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of data, the potential risk of harm from unauthorized use or disclosure of data, the purposes for which we process data, whether we can achieve those purposes through other means and all applicable legal, regulatory, and compliance requirements.

In addition, we will keep your Personal Information during:

- the statute of limitation, if needed for evidence purposes;
- the applicable legal retention periods, in particular regarding commercial, compliance, and regulatory matters, or any other mandatory retention period (such as legal hold or investigation).

## **WHAT SECURITY MEASURES HAVE WE IMPLEMENTED?**

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the Internet is not completely secure. Although we take steps to protect your Personal Information, we cannot guarantee the security of it.

## **LINKS TO THIRD PARTY WEBSITES**

Our Services might contain links or reference to the websites of third parties. We are not responsible for the data collection or privacy practices of any third party. If you choose to visit a third party's linked website, the use of any information collected by that website will be governed by the privacy policy of the operator of that website, and not by this Privacy Policy. We encourage you to review the privacy policies of the operators of any third-party website prior to using the website.

## **CHILDREN'S PRIVACY**

Our Services are not intended for use by, and we do not knowingly collect information from, individuals under the age of 18. If we determine that we have received the information of an individual under the age of 18 without the verifiable consent of the individual's parent or legal guardian, we will take steps to delete such information. If you are aware of an individual under the age of 18 providing his or her information to us without parental or guardian consent, please let us know using the contact information in the "Contact Us" section.

## DO NOT TRACK SIGNALS

Web browsers and other technologies you may use to access the Website may include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As a result, we do not currently respond to DNT browser signals or similar mechanisms.

## EUROPEAN UNION AND UNITED KINGDOM PRIVACY RIGHTS

Where required by laws of the European Union (“EU”) or United Kingdom (“UK”), you can exercise the rights described in this section by contacting us at [info@nvg8.io](mailto:info@nvg8.io).

**Right to access.** You may be entitled to obtain confirmation from us as to whether or not any Personal Information concerning you is processed by us and, if it is, information about how we process it.

**Right to rectification.** You may have the right to obtain the rectification of inaccurate, incomplete or outdated Personal Information concerning you.

**Right to erasure.** You may have the right to obtain without undue delay the erasure of your Personal Information in one of the following cases:

- The Personal Information is no longer necessary for the purpose(s) for which it was collected or otherwise processed;
- You withdraw the consent on which the processing was based, and we have no other legal grounds for the processing;
- You object to the processing, as provided in the “Right to object” paragraph below;
- Your Personal Information has been unlawfully processed;
- Your Personal Information has to be erased for compliance with a legal obligation in the EU or UK.

However, we may refuse the erasure of Personal Information under certain circumstances.

**Right to restriction.** You may have the right to obtain restriction of processing in the following cases:

- Where you claim inaccuracy of your Personal Information processed by us (the restriction being provided for a period enabling us to verify the accuracy);
- Where the processing appears unlawful, and you oppose the erasure and request the restriction of use of your Personal Information instead;

- Where we do not need your Personal Information, but it is required by you for the establishment, exercise or defense of legal claims; and
- Where an objection is raised by you in relation to the processing, pending the verification whether we have sufficient legitimate grounds for the processing.

When you have obtained a restriction of processing of your Personal Information, you will be informed prior to the lifting of such restriction.

**Right to object.** As a general rule, you may have the right to object, at any time and on legitimate grounds relating to your particular situation, to the processing of your Personal Information based on our legitimate interests. Provided that such objection is justified, we will no longer process the Personal Information concerned unless we can demonstrate sufficiently compelling legitimate grounds for the processing.

**Right to data portability.** You may request that we (i) transmit your Personal Information to you, in a structured, commonly used and machine-readable format, or (ii) to directly transmit such Personal Information to another data controller, if technically feasible.

**Right to withdraw consent.** Where the processing of your Personal Information is based on consent, you have the right to withdraw such consent at any time without affecting the lawfulness of processing before your withdrawal.

**Right to lodge a complaint.** You have the right to lodge a complaint with a supervisory authority concerning our processing of your Personal Information.

## **CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, you may request certain information regarding our disclosure of certain categories of Personal Information to third parties for those third parties' direct marketing purposes. To make such a request, please contact us at [info@nvg8.io](mailto:info@nvg8.io). This request may be made no more than once per calendar year, and we reserve our right not to respond to requests submitted other than to the email address specified below. Note that we do not currently share Personal Information with third parties for those third parties' direct marketing purposes.

## **CHANGES TO THIS PRIVACY POLICY**

We may make changes to this Privacy Policy. If we do, we will notify you by posting the updated version of the Privacy Policy to the Site. We encourage you to check this page regularly to stay current on our privacy practices.

## **CONTACT US**

If you have any questions, concerns, or would like to know more about this Privacy Policy or our privacy practices, you can email us at:

[info@nvg8.io](mailto:info@nvg8.io)