

GENERAL PRIVACY POLICY

The following Privacy Policy was designed for Dreamy Whales by Neversea Project's presentation website and it will be reviewed and updated periodically according to all applicable laws and regulations.

This Privacy Policy is applicable and refers to the data processed through the website www.dreamywhales.io and its own subdomains.

The purpose of this Privacy Policy is to easily inform you about:

1. **The definitions of the terms provided by the GDPR**
2. **Who is Dreamy Whales by Neversea Project**
3. **Where can you find us and how can you contact us**
4. **What personal data Dreamy Whales by Neversea Project may process about you, how your personal data are processed by Dreamy Whales by Neversea Project, the purpose, legal basis and period of the processing**
5. **The disclosure of your personal data to third parties**
6. **Which are your rights and how can you effectively exercise them**
7. **Children's personal data – *we do not process data for children under 16 years old***
8. **What security precautions does Dreamy Whales by Neversea Project have in place to protect your personal data**
9. **Links to other websites**
10. **Updates to the privacy policy**
11. **Information concerning Data Protection Supervisory Authority**

1. The definitions of the terms provided by the GDPR

NSAPDP represents The National Supervisory Authority for Personal Data Processing, the Romanian independent public authority responsible for the compliance with the protection of personal data requirements;

Personal data represents any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Processing represents any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Restriction of processing represents the marking of stored personal data with the aim of limiting their processing in the future;

Controller represents the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by the European Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Processor represents a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

Recipient represents a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether it is a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with the European Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

Third party a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

Data Breach represents a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data. This means that a breach is more than just losing personal data.

2. Who is Dreamy Whales by Neversea Project?

Dreamy Whales by Neversea Project refers to the affiliated companies that are developing a technical infrastructure based on blockchain technology that offers its clients a multitude of features and functionalities, such as a rewards system, payment methods within the Dreamy Whales by Neversea ecosystem, buying NFTs and many other.

Dreamy Whales by Neversea Project is owned by Fitnessverse Investment Corp an international technology company acting worldwide. However, you need to know that the technical infrastructure and all data processes performed through this presentation website are performed only by our software development partner SENSE4FIT DEVELOPMENT SRL (hereinafter referred to as “**Sense4Fit Development**”).

Sense4Fit Development observes the confidentiality and security of personal data constantly ensuring that all personal data are processed only for specific, explicit, and legal purposes, according to the principles and provisions of the GDPR.

3. Where can you find us and how you can contact us

With respect to any information regarding the personal data we process, you can e-mail us at contact@dreamywhales.io.

4. What personal data Sense4Fit Development may process about you, how your personal data are processed by Sense4Fit Development, the purpose, legal basis and the period of the processing

Also, bear in mind that personal data is considered any data that could directly or indirectly identify you, as a person.

To easily identify the personal data we process, we have combined them in several categories according to the purpose of processing.

Sense4Fit Development processes the users’ personal data, as follows:

CATEGORY 1 – ENROLLMENT TO THE DREAMY WHALES BY NEVERSEA NEWSLETTER

Personal data – e-mail address;

The purpose of processing – the personal data are processed for the purpose of allowing you to enjoy all benefits as a member of the Dreamy Whales by Neversea community, such as being always up to date with news and activity through our newsletter;

The legal Basis – art. 6 para. 1 letter a) of the GDPR Regulation, which allows us to process personal data based on your consent given to us.

The collection method - directly from you, when you access our website and fill out the form “Subscribe to our newsletter”;

The retention period – as a rule, we try to keep less data as possible, and in this case, we keep your personal data until you unsubscribe from Dreamy Whales by Neversea newsletter.

Please note that if you have opted in for our newsletter when you decided to join the Dreamy Whales by Neversea newsletter, you can unsubscribe either by pressing the unsubscribe button included in our e-mails or you can contact at the e-mail address included in this Privacy Policy.

CATEGORY 2 – SOCIAL MEDIA PLATFORMS

Personal data – related to each user, such as: user’s social media accounts; any other information users decide to provide us with when they contact us on the social media platforms; any other information users decide to provide us with when they contact us by e-mail; comments and/or posts on our profiles;

Given that the internet is not a safe space, please do not send us or limit, as much as possible, the personal data communicated through social platforms or e-mail.

The purpose of processing – the personal data mentioned above are processed for customer support purposes;

The legal Basis: Art. 6 para. 1 letter b) of the GDPR Regulation, which allows us to process personal data when necessary, for performance of a contract or for the steps prior to its conclusion;

The collection method – personal data are collected directly from users when they decide to contact us;

The retention period: personal data are stored for the purpose of proving the fulfilment of contractual obligations between the parties for a period between 30 days and 1 year, depending on the nature of the request (complaint, request for guarantee, contractual request, general request, etc.);

Generally, personal data are kept for a limited period according to the purpose of the processing and the legal provisions applicable to each category of data.

Sense4Fit Development ensures the proper deletion of personal data when such processing is no longer necessary.

5. The disclosure of your personal to third parties

Throughout its normal course of business, Sense4Fit Development will not disclose or transfer, for direct marketing purposes, your personal data to third parties, regardless if such parties are located in Romania, in the EU or outside the EU.

Our employees

Sense4Fit Development's employees that have access to personal data have been trained to observe the security and confidentiality of personal data in performing business activity. Sense4Fit Development's employee's access to personal data is limited to the information required in performing their specific tasks.

Suppliers

We perform our daily activities at the highest standards thus sometimes we choose to cooperate with other companies, in the EU or outside the EU, in order to facilitate several technical or administrative processes such as KYC verification, PEP verification, e-mail hosting services, storing data, server hosting, etc.

In case we decide to contract third parties for the supply of specific services, we will ensure that such third party complies with the provisions of GDPR and we will provide all information required for the proper performance of their services.

Legal Requirements

Your personal data may be communicated to governmental authorities and/or law enforcement agencies if required by the applicable law.

6. Which are your rights and how can you effectively exercise them

Sense4Fit Development as data controller ensures technical and organizational measures to be sure that your rights (as a data subject) are observed:

Right of access

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed by us, and, where that is the case, access to your personal data and information on how they are processed.

Right to data portability

You have the right to receive some of your personal data, which you have provided to us, in a structured, commonly used, and machine-readable format and you have also the right to transmit those data to another controller without hindrance from us, where technically feasible.

Right to object

You have the right to object to the processing of your personal data when processing is necessary for the performance of a task carried out in the public interest or for the purposes of the legitimate interests pursued by us. You have the right to object at any time if your personal data are being processed for direct marketing purposes.

Right to rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. The rectification shall be communicated to each recipient to whom the data was sent unless this proves impossible or involves disproportionate (demonstrable) efforts.

Right to erasure ('right to be forgotten')

You have the right to obtain from us the erasure of personal data concerning you without undue delay and we have the obligation to erase your personal data without undue delay where one of the following grounds applies: your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent on which the processing is based and there is no other legal ground for the processing; you object to the processing and there are no overriding legitimate grounds for the processing; your personal data have been unlawfully processed; your personal data have to be erased for compliance with a legal obligation; your personal data have been collected in relation to the offer of information society services.

Right to restriction of processing

You have the right to obtain from us restriction of processing where one of the following applies: you contest the accuracy of your personal data, for a period enabling us to verify the accuracy of your personal data; the processing is unlawful and you oppose the erasure of your personal data and request the restriction of their use instead; we no longer need your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; you have objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Right not to be subject to a decision based solely on automated processing

You have the right not to be subject to a decision solely based on automated processing, including profiling, which produces legal effects concerning the data subject or similarly affects the data subject in a significant manner. Therefore, we hereby state that Sense4Fit Development does not use applications, algorithms, artificial intelligence, or automatic process to make automatic decisions (without human intervention) that produces legal effects.

To exercise your rights listed above you can send us your request (accompanied by your contact details) electronically to the e-mail address contact@dreamywhales.io.

7. Children's personal data

Sense4Fit Development does not collect any Personal Data from children under the age of 16. So, if you are under 16, please do not submit to us any Personal Data.

8. What security precautions does Sense4Fit Development take to protect your personal data

We have assumed the responsibility to implement proper technical and organizational measures regarding the protection of privacy and security of your personal data. We have taken all reasonable measures to protect your Personal Data from damage, loss, misuse, unauthorized access, alteration, destruction, or disclosure, as follows:

1. people who have access to our filing system are only those nominated by Sense4Fit Development. To access the system, they use individual accounts and passwords which are changed periodically.
2. all our employees, collaborators, and service providers who are in contact with personal data must act in accordance with the principles and policies regarding the processing of personal data. They were informed and they have assumed respect of the GDPR by signing the Data Processing Agreements or as an effect of the law.
3. our employees and collaborators access personal data for the performance of their professional duties and only in accordance with the stated purpose of data collection.
4. computers from which the filing system is accessed are password-protected and have antivirus, antispam, and firewall security updates.

5. personal data is printed only by authorized users if it is necessary to perform our activity or to fulfill our legal obligations.

Please also select carefully what personal data you choose to submit thinking that the internet or e-mails are not impenetrable spaces, and a technical error can cause an unhappy event anytime with respect to your personal data.

9. Links to other websites

On our website, you may find links to other organizations. This Privacy Policy does not cover the personal data processed by them.

If you decide to access other organizations links, we encourage you to carefully read their Privacy Policy which should be found on their websites. In general, the Privacy Policy may be accessed at the bottom section of the website.

10. Updates to the Privacy Policy

In order to keep you informed, we always publish the latest version of the Privacy Policy on our website, without any specific notice in this respect.

We assure you that the way we collect and process your personal data is in accordance with the provisions of the GDPR Regulation.

We encourage you to constantly review this Privacy Policy in order to be constantly informed with respect to the categories, purposes, and manners Sense4Fit Development processes your personal data.

If you have any questions about our Privacy Policy, please contact us at: contact@dreamywhales.io.

11. Information concerning Data Protection Supervisory Authority

If you consider that your rights provided by Regulation no. 679/2016 have been violated, you can address directly to us or to our Data Protection Supervisory Authority: National Authority for the Supervision of the Processing of Personal Data (Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal) "ANSPDC" by submitting a complaint.

Contact details of the authority:

Link for compliances: https://www.dataprotection.ro/?page=Plangeri_pagina_principala

Contact link: <https://www.dataprotection.ro/?page=contact&lang=ro>

Website: <https://www.dataprotection.ro/>

Address: B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, cod postal 010336, Bucuresti, Romania