

## **Privacy statement XRPL Labs**

### **Introduction**

XRPL Labs takes your privacy very seriously and shall handle your personal data with the utmost security and care. In this Privacy Statement you will learn how we handle your data as well as learn about your rights concerning our processing of your data. We advise that you read this Privacy Statement thoroughly. Should you have any questions or remarks, please contact us at [support@xumm.app](mailto:support@xumm.app).

### **Who is XRPL Labs?**

XRPL Labs is the trade name of “besloten vennootschap” (limited liability) company The Integrators BV, with registered office at Amersfoort, ZIP 3822NA listed at the Traderegister of the Dutch Chamber of Commerce under 64731464.

XRPL Labs OÜ is the limited liability (OÜ) entity registered office at Tallinn, ZIP 15551 listed at the Traderegister of the Estonian Business Register under 14672588.

XRPL Labs is as the controller ultimately responsible with regard to the processing of your personal data.

### **How does XRPL Labs use your personal data?**

Underneath you will find an overview of the purposes for the processing of your personal data. You will also find a specification of which data XRPL Labs uses for that specific purpose, the legal justification, and the amount of time XRPL Labs keeps this data. For clarity's sake, we have categorised the purposes.

#### *Services, customer management and financial administration*

|                 |                                       |
|-----------------|---------------------------------------|
| Purpose:        | Providing the service itself          |
| Information:    | Data generated by the service         |
| Legal basis:    | Legal obligation                      |
| Storage period: | As long as necessary for this purpose |

### *Security and fraud prevention*

|                     |                                       |
|---------------------|---------------------------------------|
| Purpose:            | Data security                         |
| Information:        | Electronic identification             |
| Legal basis:        | Legitimate interests                  |
| Interest concerned: | Societal importance                   |
| Storage period:     | As long as necessary for this purpose |

### **How did XRPL Labs obtain your personal data?**

XRPL Labs has obtained your data because you have provided this data to us.

### **What are your rights?**

Under the European General Data Protection Regulation you have a number of rights with regard to your data and the processing thereof:

#### **Access**

You may access your personal information and make any necessary changes in your account. If you would like to see which personal data XRPL Labs has obtained about you, you may exercise your right of access by submitting a request to XRPL Labs.

#### *Making changes*

If you wish to make changes to the personal information that you have seen as a result of a request for access and you are unable to make the changes yourself in your account, you may request that XRPL Labs makes these changes for you. You may request that XRPL Labs modifies, corrects, supplements, erases or shields your information.

#### *Restriction of processing of personal data*

You also have the right, under certain conditions, to ask XRPL Labs to restrict the processing of your personal data.

### *Right to object*

If processing of your data takes place on the grounds of 'legitimate interest' by XRPL Labs or a third party, you have the right to object to that processing.

### *Portability of data*

You have the right to obtain your personal data from XRPL Labs. XRPL Labs will provide this in a structured and commonly used format, which can easily be opened using commonly used digital systems.

### *Automated processing*

Whenever a decision about you is taken that is completely based on automated processing of your personal data, you have the right to request that that decision be re-evaluated by a person. You may at all times let us know your position on that decision or let us know that you do not agree with our decision.

### *Withdrawing consent*

When the legal basis for a particular processing is your explicit consent, you have the right to withdraw that consent. This does not affect past processing, but does mean that we will no longer be allowed to process this data in the future. It may also result in XRPL Labs no longer being able to provide you with certain services.

### *Response from XRPL Labs*

A request can be sent to [support@xumm.app](mailto:support@xumm.app). XRPL Labs will comply with your request as soon as possible and in any case no later than one (1) month after XRPL Labs has received such a request. If XRPL Labs rejects your request, we will indicate in our reply why the request was rejected.

### *Recipients of your personal data*

Your data may be transmitted to:

- Data processors

It is possible that XRPL Labs is required to submit your data to a third party, for example to fulfil a legal obligation.

### **Automated Decision Making**

XRPL Labs can use automated decision-making processes based on your data, when required by law. It is possible that, based on your profile, some of the products or services of XRPL Labs may not be available. In all cases of automated decision making, you have the rights set out in the section "What are your rights".

### **What are cookies and how does XRPL Labs use them?**

Cookies are small pieces of (text) information that are sent to your browser when you visit the website of XRPL Labs and then stored on the hard disk or in the memory of your device. The cookies placed via XRPL Labs's website cannot damage your device or the files stored on it. With 'cookies', we also mean comparable techniques collecting information, such as device fingerprinting.

### **Can changes be made to this Privacy Statement?**

This Privacy Statement is subject to changes. We therefore advise you to regularly read the Privacy Statement for any such changes.

### **Questions, remarks, and complaints**

If you have any questions regarding this Privacy Statement or the way in which XRPL Labs uses your data, you can send an e-mail to [support@xumm.app](mailto:support@xumm.app). If you have a complaint about the way your data is processed, please send an e-mail to [support@xumm.app](mailto:support@xumm.app). Furthermore, you always have the right to contact the competent national data protection authority. In The Netherlands, this is the Autoriteit Persoonsgegevens.