

## **PILLOWPOINTS PRIVACY POLICY**

Last update: June 2025

This privacy policy ("Privacy Policy") is effective as of the date shown above, and describes how VeChain Foundation San Marino S.r.l. ("VeChain," "we," "our," or "us,") collects, uses, shares and otherwise processes information collected about you when you download our digital Application PillowPoints (herein referred to as "PillowPoints" or "Application").

If you are a data subject in the United Kingdom ("UK") or any part of the European Economic Area ("EEA") and/or in any case Regulation (EU) 2016/679 applies ("GDPR"), please also see the section entitled Additional Disclosures for People in Europe.

### **Data Controller**

The Data Controller is VeChain Foundation San Marino with its registered office in Strada di Paderna, 2 -47895, Domagnano – Repubblica di San Marino, COE SM29314.

### **PRODUCT OVERVIEW**

PillowPoints is an application compatible with the VeChainThor Blockchain or other authorized blockchains by VeChain (the "Blockchain") and is provided under the PillowPoints Terms of Use ("Terms").

PillowPoints is an innovative application that is available for download on mobile devices. It rewards individuals for getting a set amount of sleep every night. Users can earn rewards by connecting to their Apple HealthKit and allowing PillowPoints to access their sleep data.

### **THE INFORMATION WE COLLECT ABOUT YOU**

We limit what personal data is required to use by PillowPoints. While you may voluntarily provide to us certain information that includes personal data like contact information and communications as described below, such personal data is not required to use the Application. However, in order to provide the Application, there is limited information, which may include personal data that must be collected automatically. Please read the below carefully to understand what may be collected and how it is used:

- i Digital wallet information, including your public wallet address;
- ii Email addresses where applicable;
- iii Sleep data imported from Apple HealthKit;
- iv IP address;
- v Contact information, including name or email address when you reach out to us for support or other communications;
- vi Content, including any content in communications with us that you provide;
- vii Transaction data, including information related to transactions you make through a webpage, including time of the transaction, digital wallet information, items associated with the transaction;
- viii Usage Data is application-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Application and which we record in log files.
- ix Log Files, which are files that record events that occur in connection with your use of the Services, they are used to maintain, improve and enhance our Application and develop new products, prevent fraud, for analytics, and to generally comply with applicable laws;

We only collect email addresses for users who choose to authenticate via social login. The email addresses are collected through third-party providers, such as Privy. For details on how these services process and share your data, please refer to their respective privacy policies in clause (a) under the "Sharing of Personal and Non-Personal Data" section.

We do not collect, store, or process facial recognition data or any other biometric information. Additionally, we do not handle sensitive personal data, such as biometric identifiers, financial information, or government-issued IDs.

Transaction data, including your wallet address, timestamp, and rewards, are stored on the blockchain.

We also collect non-identifying aggregate information which we may use for the exclusive purpose of improving the security, compatibility or interoperability of the PillowPoints software.

## **HOW WE USE THE INFORMATION WE COLLECT ABOUT YOU**

We use the information we collect from and about you for the following business purposes:

- (a) To deliver and facilitate the delivery of rewards.
- (b) To provide, maintain, improve, and enhance our Application;
- (c) To find and prevent fraud, and respond to trust and safety issues that may arise; and
- (d) For compliance purposes, including enforcing our legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- (e) For information on your rights and choices regarding how we use personal data about you, please refer to clause (i) under the “Additional Disclosures for Data Subjects in Europe” section.
- (f) We do not use your personal data for targeted marketing or sell your data to third parties for advertising purposes. However, we may use aggregated, anonymized data for internal analytics to improve PillowPoints’s performance. Any future marketing-related data usage will require explicit user consent.

## **SHARING OF PERSONAL AND NON-PERSONAL DATA**

We share information we collect in accordance with the practices described in this Privacy Policy. The types of entities we may have shared information with or may share information with in the future include the following:

(a) **Third Parties Providing Applications On Our Behalf.** To provide various features, services, and materials within the app, we may share certain user information with third-party providers that assist with authentication, hosting, analytics, security, and fraud prevention. These third parties process data as part of their respective functions, and we encourage you to review their privacy policies for details on how they handle your information. We do not sell or share personal information with advertisers or third parties for marketing purposes. All data shared with third-party services is handled in accordance with their privacy policies and industry security standards.

Third-Party Services We Use:

- **Privy (social login)** – For Privy's privacy policy, please visit <https://www.privv.io/privacy-policy>
- **Apple HealthKit (Sleep data):** We use Apple HealthKit to integrate a user’s sleep data into the PillowPoints app. For Apple’s privacy policy, please visit <https://www.apple.com/legal/privacy/en-ww/>
- **Vercel (Data storage):** Vercel provides a seamless workflow for static and dynamic websites, APIs, and serverless functions. For Vercel’s privacy policy, please visit <https://vercel.com/legal/privacy-policy>

(b) **Blockchain Platform.** When you engage in a transaction that is recorded on the Blockchain, certain information that may be considered personal data related to that transaction will be published on the blockchain and may be accessible to third parties not controlled by VeChain, and will be recorded on the Blockchain permanently across a wide network of computer systems and be incapable of deletion. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of personal data, especially when blockchain data is combined with other data;

(c) Business Transfers. We share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition, business combination of all or any portion of our business or assets, change of control, or a transfer of all or a portion of our business or assets to another third party (including in the case of any bankruptcy proceeding);

(d) Legal Disclosure. Under certain circumstances, we may be required to cooperate with legal investigations and/or we may be subject to legal requirements to disclose information collected through the Application, such as a by court or a governmental agency. We may also disclose personal data to investigate any violation or potential violation of the law, this Privacy Policy, or applicable PillowPoints Terms of Use or to protect or defend the rights and property of VeChain; and If GDPR applies to you, you can also contact us to receive additional information on subjects for we share your personal data.

## **DATA SECURITY**

VeChain utilizes end-to-end encryption for both data transmission and storage to protect sensitive user information. While we implement industry-standard security measures to safeguard the Application and prevent unauthorized access, alteration, or misuse of personal data, we encourage users to follow best security practices. However, as internet transmissions are not entirely secure, we cannot guarantee the absolute security of information collected, transmitted, or submitted through the Application. We will not be responsible for loss, corruption or unauthorized acquisition or misuse of information that you provide or that we collect through the Application that is stored by us or our Application providers, or for any damages resulting from such loss, corruption or unauthorized acquisition or misuse.

Please note that any transactions made on the Blockchain while using your PillowPoints are permanently recorded on the Blockchain, and no using the Application will have no effect on the Blockchain ledger or any digital assets still associated with your PillowPoints.

## **CHILDREN’S PRIVACY**

PillowPoints is not directed towards, nor was it designed to attract the attention of any children, and we do not knowingly collect or maintain personal data from any person under the age of thirteen.

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to revise and reissue this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Your continued use of our Application indicates your consent to the Privacy Policy then posted. If the changes are material, we may provide you additional notice to your email address, by informing you about such changes through our website and/or via other channels we may use to communicate with you.

## **CONTACT US**

Please contact us at [PillowPoints.vet@gmail.com](mailto:PillowPoints.vet@gmail.com) if you have any questions or concerns about this Privacy Policy.

## **ADDITIONAL DISCLOSURES FOR DATA SUBJECTS IN EUROPE**

### **(a) Roles**

GDPR and data protection laws in Europe distinguish between organizations that process personal data for their own purposes (known as “controllers”) and organizations that process personal data on behalf of other organizations (known as “processors”). VeChain acts as a controller with respect to personal data collected as you interact with our Application;

### **(b) Lawful Basis for Processing**

GDPR and data protection laws in Europe require a “lawful basis” for processing personal data. Our lawful bases include the following:

(i) To fulfill our obligation in the contract between you and VeChain. To download PillowPoints, you and VeChain entered into an agreement under the PillowPoints Terms of Use, and in order for VeChain to fulfill its obligations with respect to providing the Application under such agreement, we have to collect your Log Data and Transaction Data to provide the necessary functionality as further described in subparagraph 2(b) above entitled Information Collected Automatically

(ii) To comply with law. In limited circumstances, we may process information in order to comply with legal obligations. To the extent we have received such information from third parties where we have agreed to contractual requirements such as standard contractual clauses, we will use our reasonable efforts to dispute making such disclosures unless legally required to do so;

(c) Retention of Information

Once the purpose of processing is fulfilled, we retain personal data for up to 12 months after account inactivity.

Note that blockchains (including our Blockchain) are designed by default to permanently record information across a wide network of computer systems; therefore, while we commit not to store immediately identifiable personal data, some pseudonymized information such as transaction data will be stored across the Blockchain and therefore it will not be possible to delete such information, but users may create new wallets to dissociate past transaction history from future activity;

(d) Data Transfer

If GDPR applies and your data is transferred outside UK or the EEA to the United States or any other country, we will transfer your personal data subject to appropriate safeguards, such as an adequacy decision by the European Commission on the basis of article 45 the GDPR, or Standard Contractual Clauses as provided from time to time by the European Commission. You can receive additional information on where your data is transferred, and which are the appropriate safeguards by contacting us;

(e) Your Data Subject Rights

(i) Your Rights to Your Information.

If you are a data subject according to the GDPR, subject to certain conditions you have the right to:

access, rectify, or erase any personal data we process about you;

data portability, asking us to transfer to any third party at your choice

restrict or object to our processing of personal data we process about you; and

where applicable, withdraw your consent at any time for any data processing; and

(ii) How to Exercise Your Rights.

You may exercise your rights by submitting a written request to us at the email address set out in paragraph 9 above entitled Contact Us. We will respond to your request within thirty (30) days. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions;

(iii) When Information May Be Retained.

Please note that we retain information as necessary to fulfil the purposes for which it was collected, and may continue to retain and use information even after a data subject request for purposes including to perform under the contract, as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements;

(f) Complaints

If you have a complaint about our use of your personal data or response to your requests regarding your personal data, you may submit a complaint to the Data Protection Supervisory Authority in your jurisdiction. We would, however, appreciate the opportunity to address your concerns before you approach a data protection regulator, and would welcome you directing an inquiry first to us.