

Privacy Policy

Updated: 2022-12-31

Introduction

This Privacy Policy explains what personal data we gather about you and how we process your personal data on the basis of your use of our Website or through your use of our services, which services include campaigns, surveys and competitions which we launch from time to time. Any queries relating to this Privacy Policy and any other aspects of your data privacy can be addressed to us at admin@bigpicturecoin.com.

When we refer to "we" or "us" this refers to Big picture Coin Single Member P.C., a company registered in Greece with company registration, and with the registered address at Paligenesias 71 Nea Zoi Peristeri 121-37 Athens Attica Greece which operates under the brand name "Big Picture Coin". Big Picture Coin Single Member P.C. is the data controller, being the company that's responsible for your privacy pursuant to this Privacy Policy.

When we refer to "our Website" or "this Website" or "our Site" in this Privacy Policy we mean the specific webpage of Big Picture Coin – <https://www.bigpicturecoin.com>.

In this Privacy Policy, your information is called "personal data" or "personal information". We also collectively refer to handling, collecting, protecting and storing your personal information as "processing" such personal information.

a. What personal data do we process?

Our Site is designed in such a manner that it makes it possible for users to visit and use our Website without disclosing or revealing any personal information about themselves. However, you may choose to provide us with personal information when you contact us via the 'Contact Us' page on our Website. Should this occur, we oblige ourselves to process any such personal data that you may provide in full accordance with all applicable data privacy laws, and in such a manner that is necessary for us to be able to respond and administer any request that you may make.

You may also decide to provide us with your personal information when signing up or participating in surveys, campaigns, competitions or other activities organized by us. The personal information so collected normally includes your full name as well as your contact details which shall all be processed strictly in accordance with this Privacy Policy and in such a manner to ensure the proper conduct of the survey, campaign, competition or other activity concerned.

From time to time, we may further process your personal data to provide you with

information about developments taking place in our business industries, and which we feel may be of interest to you. However, this will be subject to you giving us prior consent for such personal data processing. Please inform us by sending an email to Admin@bigpicturecoin.com if you do not wish to receive such information from us.

Furthermore, we are entitled to request from you, at any point in time, information and/or other documentation that we, in our sole discretion, deem fit and necessary in order to comply with any applicable law or regulation in connection with the holding and using of Big Picture Coin tokens (BPC).

We also gather other information when you access our Website. To find out more about how we use cookies, please see our Cookie Notice available on [insert hyperlink].

b. Providing personal data to third parties

We do not pass on your personal data, collected from you as a visitor to our Website, to any third party unless you provide us with your consent to do so. Such disclosure to third parties would be required to provide to you our services, such as running campaigns and competitions which may be conducted with the assistance of third parties. Your refusal to provide such third parties with your personal information may disqualify you from participating in the campaigns or competition concerned. Furthermore, your personal information will be shared with third parties, without the need of obtaining your consent, in the instances indicated below.

You will be aware however that personal data sent via the internet may be transmitted across international borders, even where the sender and the receiver of such information are located in the same country. Consequently, data relating to you may be transmitted via a country having a lower level of data protection than that existing in your country of residence.

Without prejudice to anything contained in this Privacy Policy, we reserve the right to disclose personal data relating to you to any third party, if such disclosures are necessary inter alia for the following purposes:

- For the purpose of preventing, detecting or suppressing fraud or any other criminal activity;
- Where it is a matter of national or public security;
- In the interest of national budgetary, monetary or taxation matters that can arise;
- To protect and defend our rights and property or that of users of our Website;
- To protect against abuse, misuse or unauthorized use of our Website;
- To protect the personal safety or property of users of our Website (e.g. if you provide false or deceptive information about yourself or attempt to pose as someone else, we shall disclose any information we may have about you in our possession so as to assist any type of investigation into your actions);
- For any purpose that may be necessary for the performance of any agreement

you may have entered into with us; or

- As may be allowed or required by or under any law

c. Retention of personal data

No personal data that we process will be kept longer than necessary for the purposes for which it is collected. In particular, we shall retain your personal information for the longer of the following periods: (i) the end of the relevant campaign, competition, survey or other activity being the purpose for which you have provided your personal data; (ii) any retention period that is required by law (including but not limited to any prevention of money laundering and funding of terrorism legislation that may be applicable); or (iii) the end of the period in which litigation or investigations might arise in respect of your use of our services.

d. Compliance

This Privacy Policy and all other personal data processing we may undertake is in strict accordance with the Data Protection Act (the Laws of Greece), and with EU Regulation 2016/679 (General Data Protection Regulation). We will also endeavor to employ all reasonable measures to safeguard the confidentiality and security of all personal data that may be processed by us at any time. Such measures include the following:

- Administrative and technical controls to restrict access to personal data on a 'need to know' basis;
- Physical security measures, such as staff security passes to access our premises;
- Technological security measures, including firewalls, encryption and anti-virus software.
- Where data is processed by a third-party as outlined in this Privacy Notice, we ensure that such third parties provide sufficient guarantees to implement appropriate technical and organizational measures in such a manner that any processing by them satisfies the legal requirements in terms of applicable data protection laws, including the protection of your rights. Moreover, we also ensure that processing by third parties is governed by an agreement between us and third party which includes the necessary contractual clauses to ensure protection of your personal data.

Although we use appropriate security measures once we have received your personal data, we remind you that by its very nature the internet may not always be a secure medium and data sent via the internet can potentially be subject to un-authorized acts by third parties. We cannot guarantee the privacy or confidentiality of any information passing over our Website, nor shall we accept any responsibility or liability whatsoever for the security of your personal data

while in transit through the internet.

e. Third party websites

• Our Website may from time to time contain links to both local and international third party websites after obtaining permission from them. Any such links are not an endorsement by us of any information in such website or products and/or services offered through the same. We shall not accept any responsibility whatsoever for the content, use, availability, privacy practices or the content of any such websites. Please note that upon entering such other websites, you become subject to the privacy policy of such other sites.

No third party is permitted to link any other website to our website without obtaining our prior consent in writing.

f. Changes to this Privacy Policy

We reserve the right to unilaterally modify this Privacy Policy at any time, particularly if statutory obligations so mandate or the interest of our users' security so requires. To let you know when we make changes to this Privacy Policy, we will amend the revision date at the bottom of this page. The modified Privacy Policy will apply from such revision date. We will not officially notify you about such changes, and it is therefore in your own interest to check this Privacy Policy page from time to time so as to familiarize yourself with any changes.

g. What are your rights?

Provided you fall within the legal definition of a 'data subject' in terms of the Laws of Greece and EU Regulation 2016/679, you have the following rights in relation to your personal data:

- Obtain confirmation that we are processing your personal data and request access to such personal data we hold about you;
- Ask that we update the personal data we hold about you or correct such personal data that you think is incorrect or incomplete;
- Ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data;
- Withdraw consent to our processing of your personal data (to the extent such processing is based on consent);
- Receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format;
- Object to our processing of your personal data.

Any request to exercise any of your above rights must be made in writing to us at the following mailing address admin@bigpicturecoin.com and must be signed by yourself as the data subject to whom the particular personal data relates to. We shall provide you with access to your personal data, including a copy thereof, at no charge. However, if your requests in exercising your above rights be manifestly unfounded or excessive, in particular repetitive in nature, we reserve the right to charge you an administrative charge (determined at our sole discretion) of which you shall be informed beforehand.

h. Right to enter a complaint

You are reminded that the law grants you a right to lodge a complaint with your local or national data protection authority, provided you are based in an EEA territory. In Greece, this is the Office of the Information and Data Protection Commission, which may be accessed by clicking this link (<https://www.dpa.gr/en>).

This Privacy Policy explains in particular how, for which purposes and to which extent your Personal Data is collected and processed by us through the Website or any type of Service we provide to you (whenever we are referring to you, hereinafter referred to as "**User**" or "**you**"). It also describes how your collected Personal Data can be verified, corrected or deleted. Our Services enable the collection of your Personal Data necessary for the establishment and maintenance of our blockchain-offerings.

I Changes to This Privacy Policy

1

We reserve the right to make changes to this Privacy Policy at any time by giving notice to Users on this page and possibly within the Website and/or – as far as technically and legally feasible – sending a notice to Users via any contact information available to the Controller. Significant changes will go into effect 30 days following such notification. Non-material changes or clarifications will take effect immediately. It is strongly recommended to review the Website and the Privacy Notice periodically for updates.

2

Should the changes affect processing activities performed on the basis of the User's consent, Controller shall collect consent from the User, where required.

IX Access to the Privacy Policy

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The User can access, download, save or print this Privacy Policy in its' current/ updated version at any time under the following address bigpicturecoin.com

IX Definitions and legal references

1

Personal Data

Any information that directly, indirectly, or in connection with other information –

including a personal identification number – allows for the identification or identifiability of a natural person.

2

Usage Data

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Website) and the details about the path followed within the Website with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

3

User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

4

Data Subject

The natural person to whom the Personal Data refers.

5

Data Processor

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this Privacy Policy.

6

Data Controller

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, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the owner of this Website.

7

Website

The Website of Controller available under <https://bigpicturecoin.com>

8

Service

The Services (and blockchain offerings) provided by Controller.

9

European Union (or EU)

Unless otherwise specified, all references made within this document to the

European Union include all current member states to the European Union and the European Economic Area.

10

Cookies

Small sets of data stored in the User's device.

11

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This Privacy Policy relates solely to this Website, if not stated otherwise within this document.

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Effective date

This Privacy Notice was created on and has been in effect since the 10.March 2022. We reserve the right, at our complete discretion, to change, modify, add, or remove portions of this Privacy Policy at any time. You should check back periodically at this page to read the most recent version of this Privacy Policy as your continued use of this Website following the posting of changes to these terms will mean you acknowledge these changes.

Additional Notations

- **Google**

Notes/Explanation: Google provides web, analytics and productivity services. Services used include Google Analytics and personal data that it will receive and process includes IP address. Their privacy policy can be found [here](#).

1. The updated list of these parties may be requested from the Controller at any time.
2. Cookies on the Thousand Validators Programme: The website giving access to the Kusama Thousand Validators Programme <https://docs.google.com/forms/d/e/1FAIpQLSewhltQOcmkIIE7Wftn0NTVuyEs6Wk8Qpx6ssCAo2BO4oQH0w/viewform> and the Big Picture Coin Thousand Validators Programme <https://docs.google.com/forms/d/e/1FAIpQLSdS-all-J2wgIRCQVjQC7ZbFiTnf36hYBdmO-1ARMjKbC7H9w/viewform> use cookies to help us provide you with a good experience when you browse these Websites and allow us to improve our Websites.
3. Web analysis services: For the evaluation of the use of the Thousand Validators Programme Controller uses the following web analysis services of third parties listed below, to whom data may also be disclosed to the extent required for the use of these services. Secondly, Controller may use the following special plugins and link

icons from different providers on the website as listed below. We also use the web-analysing tool Google Analytics by Google (Google Inc., USA) on our Website to compile anonymous user statistics. Google Analytics uses cookies. To ensure the protection of your personal data, we use a function which processes your IP address in truncated form only in order to prevent a direct personal reference (IP-Anonymization). Your personal data collected by us may be transferred to a server of Google in the United States. Google is certified under Swiss-US and EU-US Privacy Shield, which secures that an adequate data protection level is maintained when processing your personal data. If you have any concerns in connection with the use of Google Analytics, you may block Google Analytics by installing e.g. a plug-in in your browser. A plug-in for the most common browsers can be downloaded here: <http://tools.google.com/dlpage/ga-optout?hl=de>. You can at any time either download and install a Google browser plug-in. In this case, an opt-out cookie is set. Both options only prevent the use of web analysis as long as you use the browser in which you installed the plugin and do not delete the opt-out cookie. Further information on Google Analytics can be found in the terms of use of Google Analytics, the data protection guidelines of Google Analytics and the data protection regulations of Google: <https://policies.google.com/privacy>.

We also use social plugins of the LinkedIn network. The provider is called LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. For every access to our website that contains social plugins, a connection to LinkedIn servers is established. LinkedIn is informed that you have visited our website with your IP address. If you click on the "Recommend" button from LinkedIn and are logged into your LinkedIn account, LinkedIn can link your visit to our website with you and your user account. We would like to point out that we, as the operator of this Website, have no detailed knowledge of the content of the data transmitted to LinkedIn and its internal processing. LinkedIn is responsible to you for processing your personal data as a "controller". Further information on the processing of your data by LinkedIn can be found in LinkedIn's data protection regulations at: <https://www.linkedin.com/legal/privacy-policy>. Instead of registering directly through the website <https://docs.google.com/forms/d/e/1FAIpQLSewhltQOcmkIIE7Wftn0NTVuyEs6Wk8Qpx6ssCAo2BO4oQH0w/viewform> you can also register with GitHub. This service is provided by GitHub, Inc, 88 Colin P Kelly Jr St, San Francisco, CA 94107. If you choose to register with GitHub, you will be automatically

redirected to the GitHub platform. There you can log in with your usage data. This will link your GitHub profile to our Website and/or the Thousand Validators Programme. This link gives us access to your data stored at GitHub. These usually are GitHub Name, GitHub profile picture, Email address stored at GitHub, GitHub ID, birthday, gender and/or country of residence. This data is only used to set up, provide and personalize your account. For more information, see the GitHub Terms of Service and the GitHub Privacy Policy. You can find this at: <https://help.github.com/en/github/site-policy/github-terms-of-service> and <https://help.github.com/en/github/site-policy/github-privacy-statement>.

4. Within and to the extent under the scope of application of the GDPR, the data processed by web analysis services for the aforementioned purposes is justified in order to protect our legitimate interests and those of third parties pursuant to Art. 6 para. 1 sentence 1 letter of GDPR.