

Privacy Policy

Last Updated: December 19, 2024

1. General Information and Who We Are

SUPER HOW, LTD, registered office at 128 City Road, EC1V 2NX, London, United Kingdom, trading as BeMy.Digital (“BeMy.Digital”, “SUPER HOW?”, “we,” “us,” “our” or the “Data Controller”). This Privacy Policy (“Policy”) governs your access to and use of BeMy.Digital (the “Website”).

Our Policy explains how we handle personal information collected from you during your use of our Website and services.

By accessing our Website and using our services, you agree to the terms set out in this Policy. If you do not agree, please refrain from using the Website.

SUPER HOW, LTD complies with the UK General Data Protection Regulation (“UK GDPR”), the Data Protection Act 2018, and other applicable UK data protection laws (“Data Protection Laws”).

We may update this Policy periodically and encourage you to review it regularly.

If you are under the age of 16, you must obtain parental or guardian consent before submitting personal data.

If you have any questions about how we handle your data, please contact us at dm@bemy.digital.

2. What Personal Information BeMy.Digital Process?

Personal information encompasses any details that can be used to identify a person either directly or indirectly. This includes, but is not limited to, identifiers like names, identification numbers, location details, online identifiers, or characteristics related to an individual's physical, mental, genetic, economic, cultural, or social aspects. Different sets of information which together may allow the identification of a specific individual also constitute personal data. What personal data we collect will depend on the purpose for which your data will be processed.

We may collect and process the following personal data:

1. **Identifying information:** Name, postal address, email, phone number, etc.
2. **Regulatory information:** Data required to comply with anti-money laundering (AML) and counter-terrorism financing (CTF) laws, including identity documents, taxpayer identification numbers, nationality, facial photographs, etc.
3. **Transaction data:** Transaction amounts, dates, recipients, and related details.
4. **Communication data:** Records of interactions, such as emails, messages, or phone calls.
5. **Technical data:** IP addresses, device specifications, and online activity metrics.

This information may be collected directly from you during registration, service use, or communications with us, or from third parties such as financial institutions or identity verification providers.

In accordance with relevant Laws, we gather data from third parties, such as:

- XUMM wallet ID (optional), XRPL wallet address, payment details, transaction history.

3. Legal Basis of Processing of Personal Information

We process your personal data based on the following legal grounds under the UK GDPR:

1. **Consent** (Article 6(1)(a)): Where you have explicitly consented to data processing, e.g., for marketing purposes.
2. **Contractual Necessity** (Article 6(1)(b)): To provide services such as app usage, transaction processing, or customer support.
3. **Legal Obligation** (Article 6(1)(c)): To comply with AML, CTF, tax, and other regulatory requirements.
4. **Legitimate Interests** (Article 6(1)(f)): To pursue our legitimate business interests, provided they do not override your rights and freedoms.

Failure to provide necessary personal data may result in our inability to deliver services to you.

4. Purposes of Processing of Personal Information

Your data may be processed for the following purposes:

1. **Identification and communication** (e.g., verifying your identity, contacting you).
2. **Compliance with AML and CTF laws** (e.g., assessing the origin of funds).
3. **Legal and contractual obligations** (e.g., notifying you of policy changes).
4. **Protecting legitimate interests** (e.g., investigating misuse of our services).
5. **Direct marketing** (if consent is provided).

If you do not wish to receive marketing communications, you can opt out at any time by emailing us at dm@bemy.digital.

5. Recipients of Personal Data

We may disclose your data to the following parties:

1. Business partners (e.g., NFT creators).
2. Service providers (e.g., hosting, delivery, or payment providers).
3. Regulatory authorities, when required by law.

We will not share your data with unrelated third parties without your consent unless required by law.

6. Data Protection Measures

We have implemented technical and organizational measures to safeguard your personal data. While we strive to ensure maximum security, no system can guarantee absolute protection against unauthorized access or loss.

Our data processors include hosting providers, marketing service providers, and IT infrastructure vendors, among others.

7. International Data Transfers

If we transfer your personal data outside the UK, we will ensure adequate safeguards are in place, such as Standard Contractual Clauses (SCCs) or other lawful mechanisms under the UK GDPR.

8. Your rights

As a data subject, you have the following rights under the UK GDPR:

1. **Right to be informed:** About how your data is processed.
2. **Right of access:** To obtain copies of your data.
3. **Right to rectification:** To correct inaccurate or incomplete data.
4. **Right to erasure:** To request deletion of your data (subject to conditions).
5. **Right to restrict processing:** To limit data use in certain circumstances.
6. **Right to data portability:** To receive your data in a transferable format.
7. **Right to withdraw consent:** If processing is based on consent.

You may exercise these rights by contacting us at **dm@bemy.digital**. You also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) at www.ico.org.uk.

9. Third Party Websites

Our Website may contain links to third-party websites. We are not responsible for their privacy practices, and we encourage you to review their privacy policies.

10. Contact Information

For any data protection concerns, you can contact our Data Protection Officer at:

- Email: **dm@bemy.digital**
- Address: **SUPER HOW, LTD, 128 City Road, EC1V 2NX, London, United Kingdom**