ALGORAND FOUNDATION PRIVACY POLICY

The purpose of this document ("Privacy Policy") is to inform you of how Algorand Foundation Ltd. (the issuer of the ALGO Tokens and the corporate entity launching the Algorand Blockchain Network) manages personal data in accordance with the Personal Data Protection Act 2012 ("the Act"). Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us or signing up for any promotions or services offered by us ("Services"), you agree and consent to Algorand Foundation Ltd. (a company limited by guarantee incorporated in Singapore with its registered address at 1 George Street, #10-01, One George Street, Singapore (049145)), its related corporations and affiliates, (collectively referred to herein as the "Foundation", "us", "we" or "our"), as well as our respective and/or agents ("Representatives") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Foundation’s authorised service providers and relevant third parties in the manner set forth in this Privacy Policy.

This Privacy Policy supplements but does not supersede any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are cumulative and additional to any rights which the Foundation may have at law to collect, use, disclose and/or process your Personal Data. This Privacy Policy does not affect any rights which we may have at law in connection with the collection, use, disclosure and/or processing of your Personal Data. Subject to your rights at law, you agree to be bound by the prevailing terms of this Privacy Policy as updated from time to time on our Site. Please check the Site regularly for updated information on the handling of your Personal Data.

1. YOUR PERSONAL DATA

1.1 In this Privacy Policy, "Personal Data" means all data that falls within the definition of personal information, personal data, personally identifiable information or similar language under any applicable law relating to the protection, privacy and security, collection, use or disclosure of sensitive or other personally identifiable information, including the PDPA (collectively, "Data Protection Laws").

1.2 Examples of such Personal Data which we collect and/or which you may provide us include (depending on the nature of your interaction with us):

(a) personal details (such as name, gender, date of birth/age, nationality, passport or national ID number, social security number, tax identification number);

(b) contact details (such as address, email address, telephone number, social media account details);

(c) financial details (such as bank information, credit card information, utility bill, credit report, other financial details with respect to "Accredited Investor" verification)

(d) corporate details (such as name, place of registration, registration number, transparency register number, details with respect to articles of association and other similar documents/certificates, details with respect to shareholders and/or beneficial owners (including their personal and contact details)

(e) technical information of your device which you use for orders and communication (such as cell phone, tablet, notebook, personal computer, IP address)
(f) log in information (such as email address, password);

(g) your cryptocurrency wallet address; and

(h) information about your visit and use of our Site and Services, including cookies, information about your domain name and IP addresses.

1.3 To the maximum extent permitted under applicable law, we may anonymise your Personal Data so that it no longer identifies you, in which case we shall be entitled to retain, use, disclose, and/or process such anonymised data without restriction, including for business product related reviews.

1.4 In the course of your interaction on the Algorand Blockchain Network, we may also create Personal Data about you, such as records of your interactions with us and details of your transaction history.

1.5 In order to comply with international sanctions and applicable regulations for securities and to fight money-laundering or the financing of terrorism, we may need to check any Personal Data provided by you against publicly available databases.

1.6 For the avoidance of doubt, in the event that Data Protection Laws permits the Foundation to collect, use, disclose and/or process your Personal Data without your consent, such permission granted by the law shall continue to apply.

2. COLLECTION OF PERSONAL DATA

2.1 Generally, your Personal Data may be collected by us in the following ways:

(a) when you contact us via e-mail, telephone or by any other means;

(b) in the ordinary course of our relationship with you;

(c) when we provide you with access to the Algorand Blockchain Network;

(d) where you have manifestly chosen to make such Personal Data public, including via social media profiles;

(e) when we receive your Personal Data from third parties who legally provide it to us, such as background/credit reference checking agencies or law enforcement agencies;

(f) when you visit any of our websites (including, the Site) or use any features or resources available on or through our websites (including but not limited to applying for the relevant ecosystem grant program and community champion award through links available on the Site). When you visit our website, your device and browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a website and other technical communications information), some of which may constitute Personal Data;

(g) when you submit your resume/CV to us for a job application;

(h) when you acquire ALGO Tokens directly from us; and/or

(i) when you submit your Personal Data to us for any other reason.

2.2 When you browse our Site, you generally do so anonymously but please see paragraph Error! Reference source not found. below for information on cookies which we have implemented on our Site.
2.3 If you provide us with any Personal Data relating to a third party (e.g. information on your dependent, spouse, children and/or parents), by submitting such information to us, you represent and warrant to us that you have obtained the consent of such third party to you providing us with their Personal Data, and for the further collection, use, disclosure and/or processing by us of their Personal Data, for the purposes contemplated hereunder, and that such consents have not been withdrawn.

2.4 You shall ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the products and/or services which you have requested.

3. PURPOSES FOR THE COLLECTION, USE, DISCLOSURE AND/OR PROCESSING OF PERSONAL DATA

3.1 In general, we collect, use, disclose and/or process your Personal Data for the following purposes:

(a) to provide, maintain and improve our Services, including without limitation ensuring open access to and technical development on the Algorand Blockchain Network, minting and launching the ALGO Tokens, providing long-term governance, community and ecosystem, and being a treasurer of the funds raised;

(b) to help us review, develop, improve, manage the delivery of and to the extent this requires the use of Personal Data, enhance our products and services, including analysing customer behaviour and future customer needs, conducting market research, list processing and data analytics (including by requesting feedback from you or your participation in surveys);

(c) for authentication and verification purposes;

(d) to enable, improve or update information on the use of the Algorand Blockchain Network;

(e) to grant you access to and participate in the governance of Algorand Blockchain Network;

(f) to enable you to apply to and be considered by the Foundation for operating nodes on Algorand Blockchain Network;

(g) to enable you to apply to and be considered by the Foundation for the relevant grant for building projects on or relating to Algorand Blockchain Network;

(h) to enable you the use of ALGO Tokens;

(i) for the issuance, distribution, use and circulation of or exchange for ALGO Tokens, where you have submitted Personal Data to us for the purposes acquiring of the ALGO Tokens;

(j) specifically, in relation to the processing of your Personal Data:

(i) as may be necessary in connection with any contractual relationship that you may enter into with us;

(ii) as may be required by applicable law;

(iii) as is necessary to protect the vital interests of any individual; and
(iv) where we have a legitimate interest in carrying out the processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

(k) to respond to, handle, and process queries, requests, applications, complaints, and feedback from you;

(l) detect, prevent, and address technical issues;

(m) enhance security, monitor and verify identity or service access, combat spam or other malware or security risks;

(n) send information including confirmations, technical notices, updates, security alerts, and support and administrative messages;

(o) detect, prevent and mitigate fraud and abuse of our Services and to protect you against account compromise or funds loss;

(p) to handle disputes and conduct and facilitate investigations and proceedings;

(q) to prevent, detect and investigate crime, including fraud and money-laundering, and to analyse and manage other commercial risks;

(r) to manage our infrastructure operations, administrative operations and business operations and to comply with internal policies and procedures;

(s) to comply with, protect and enforce our contractual and legal rights and obligations;

(t) to commence, respond to, or act in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution);

(u) to match any Personal Data held which relates to you for any of the purposes listed herein;

(v) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sales);

(w) to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities;

(x) where required or permitted by law for any purpose; and/or

(y) for purposes which are reasonably related to the aforesaid.

3.2 In addition, and without prejudice to the generality of the foregoing, if you submit an application to us as a candidate for employment or an internship, or are an existing employee of the Foundation, we collect, use, disclose and/or process your Personal Data for the following purposes:

(a) for management and/or evaluative purposes, including without limitation to process your employment application, to conduct pre-recruitment checks, and/or to provide or obtain employee references or other references where relevant for background screening and/or vetting;

(b) for personnel administration, including to administer benefits and payroll processing, to administer or execute employee remuneration schemes, and/or to his/her employment-related work activities;
(c) to enter into an employment relationship with you or to appoint you to any office;
(d) to manage or terminate the employment relationship with you or appoint you, including without limitation role assessment, job compatibility assessment, career progression and/or management of staffing requirements; and/or
(e) for purposes which are reasonably related to the aforesaid.

3.3 Furthermore, and without prejudice to the generality of the foregoing, and where permitted under Data Protection Laws, we may also collect, use, disclose and/or process your Personal Data and/or share your Personal Data with our business partners for any of the following purposes:
(a) providing or marketing services, products and benefits to you, including promotions;
(b) to enable you to apply to and be considered and selected by the Foundation for the relevant marketing initiatives and campaigns for promotion relating to the Foundation and Algorand Blockchain Network (including but not limited to you, if selected by the Foundation, appearing on the relevant Foundation marketing, promotion or community webpage and may be contacted by other members in our communities or any visitor of our websites)
(c) for us or our business partners to inform you via e-mail about upcoming opportunities and promote our respective products and services;
(d) to administer a contest, promotion, survey or other site feature;
(e) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the customisation, provision or offering of products, services, marketing or promotions, whether by the Foundation or other third parties; and
(f) conducting research, analysis and development activities (including data analytics, surveys, product and service development and/or profiling), understanding and analysing customer behaviour, location, preferences and demographics for us to offer you products and services as well as special offers and marketing programmes which may be relevant to your preferences and profile.

3.4 In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use, disclose and/or process your Personal Data. If so, we will collect, use, disclose and/or process your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

3.5 We also reserve the right to monitor, check and process your Personal Data if necessary to investigate or obtain evidence concerning any complain, claim or dispute or any actual or suspected illegal or unlawful conduct or to aid in such investigation or evidence gathering by any law enforcement or regulatory authorities.

3.6 You may withdraw your consent by contacting us using the contact details set out at paragraph 8 below.

4. DISCLOSURE OF PERSONAL DATA

4.1 Subject to the provisions of any applicable law, you hereby agree, acknowledge and consent that your Personal Data may be disclosed for any of the purposes listed above in this Privacy Policy (as applicable) to the following entities or parties, regardless of whether they are located overseas or in Singapore:
(a) our service providers and contractors, including third party vendors that provide data processing or management services;

(b) our business partners and members of our communities (and in particular, where you have consented to receiving information/newsletters/marketing/promotion from us);

(c) our group affiliates;

(d) other holders or users of ALGO Tokens;

(e) any person or entity involved in the handling of ALGO Tokens or Services provided to you; and

(f) law enforcement authorities, regulatory authorities, statutory bodies or public agencies for the purposes of complying with their requirements, policies, directives or requests;

(g) banks, credit agencies and other financial and/or payment service providers;

(h) IT-service providers;

(i) members of Algorand Blockchain Network communities (actual or prospective);

(j) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale); and/or

(k) any other party to whom you authorise us to disclose your Personal Data to.

4.2 We may share information about you in aggregate or anonymised form, for example, information regarding business product related reviews, with the abovementioned entities or parties (e.g. our business partners).

5. **KEEPING YOUR PERSONAL DATA ACCURATE AND UP-TO-DATE**

We encourage you to contact us as soon as possible to enable us to update any Personal Data we have about you. Incomplete or outdated Personal Data may result in our inability to provide, or delays in providing you with products and services you have requested, or processing any requests and applications you may have made to us.

6. **ALGORAND FOUNDATION’S COOKIE POLICY**

6.1 Our websites (including our Site) and platforms use cookies and other technologies. Cookies are small text files stored in your computing or other electronic devices when you visit our website (including our Site) and platforms for record keeping purposes. Cookies are stored in your browser’s file directory, and the next time you visit the website (including our Site) or platform, your browser will read the cookie and relay the information back to the website (including our Site), platform or element that originally set the cookie. Depending on the type of cookie it is, cookies may store user preferences and other information.

6.2 Web beacons (also known as pixel tags and clear GIFs) involve graphics that are not apparent to the user. Tracking links and/or similar technologies consist of a few lines of programming code and can be embedded in our websites (including our Site) or platforms. Web beacons are usually used in conjunction with cookies and primarily used for statistical analysis purposes. This technology can also be used for tracking traffic patterns on websites (including our Site) and platforms, as well as finding out if an e-mail has been received and opened and to see if there has been any response.

6.3 We may employ cookies and other technologies as follows:
(a) tracking information such as the number of visitors and their frequency of use, profiles of visitors and their preferred sites;

(b) making our websites (including our Site) and platforms easier to use. For example, cookies may be used to help speed up your future interactions with our websites (including our Site) and platforms;

(c) to better tailor our products and services to your interests and needs. For example, cookies information may be identified and disclosed to our vendors and business partners to generate consumer insights;

(d) collating information on a user’s search and browsing history;

(e) when you interact with us on our websites (including our Site) and platforms, we may automatically receive and record information on our server logs from your browser. We may collect for the purposes of analysis, statistical and site-related information including, without limitation, information relating to how a visitor arrived at the website (including our Site) or platform, the browser used by a visitor, the operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp (which may include for example, information about which pages they have viewed, the time the pages were accessed and the time spent per web page);

(f) using such information to understand how people use our websites (including our Site) and platforms, and to help us improve their structure and contents;

(g) using cookies that are necessary in order to enable our websites (including our Site) and platforms to operate, for example, cookies that enable you to log onto secure parts of our websites (including our Site) and platforms; and/or

(h) personalising the website (including our Site) and platform for you, including delivering advertisements which may be of particular interest to you and using cookie related information to allow us to understand the effectiveness of our advertisements.

6.4 Some cookies we use are from third party companies to provide us with web analytics and intelligence about our websites (including our Site) and platforms. These companies collect information about your interaction with our websites (including our Site) and platforms. We use such information to compile statistics about visitors who interact with the websites (including our Site), platforms and other Foundation’s online content, to gauge the effectiveness of our communications, and to provide more pertinent information to our visitors.

6.5 If you do not agree to such use of cookies, you can adjust your browser settings. Unless you have adjusted your browser settings to block cookies, our system will issue cookies as soon as you visit our website (including our Site) or click on a link in a targeted email that we have sent you, even if you have previously deleted our cookies.

6.6 The way which cookies can be managed depends on your browser. The following links provide information on how to configure or disable cookies in each browser:

(a) Google Chrome: https://support.google.com/chrome/answer/95647?hl=en
(b) Mozilla Firefox: https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
(c) Internet Explorer: http://windows.microsoft.com/en-SG/internet-explorer/delete-manage-cookies#ie=ie-9
(d) Safari: https://support.apple.com/en-sg/guide/safari/sfri11471/mac
6.7 If you do not agree to our use of cookies and other technologies as set out in this Privacy Statement, you should delete or disable the cookies associated with our websites (including our Site) and platforms by changing the settings on your browser accordingly. However, you may not be able to enter certain part(s) of our websites (including our Site) or platforms. This may also impact your user experience while on our websites (including our Site) or platforms.

7. THIRD-PARTY INFORMATION

Certain links contained on the Site may direct you to co-branded websites maintained by the Foundation or to companies which the Foundation has established business relationships. When you submit information to one of these co-branded sites or partner companies, you may be submitting it to both the Foundation and these business partners. This Privacy Policy does not apply to any information that you may provide to third parties, such as through other sites linked to the Site. The Foundation is not responsible for those sites and cannot control the content of what is offered on those sites, or links from those sites, or the privacy policy or data security, if any, of those sites, and we therefore strongly encourage you to read their respective privacy policies as they may differ from ours.

8. CONTACTING US – WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION OF YOUR PERSONAL DATA

8.1 If you:

(a) have any questions or feedback relating to your Personal Data or about this Privacy Policy;

(b) would like to withdraw your consent to any use of your Personal Data as set out in this Privacy Policy; or

(c) would like to obtain access and make correction to your Personal Data records,

please contact us as follows:

<table>
<thead>
<tr>
<th>Method</th>
<th>Contact Particulars</th>
</tr>
</thead>
<tbody>
<tr>
<td>By mail</td>
<td>Algorand Foundation Ltd.</td>
</tr>
<tr>
<td></td>
<td>1 George Street, #10-01</td>
</tr>
<tr>
<td></td>
<td>Singapore 049145</td>
</tr>
<tr>
<td>By email</td>
<td><a href="mailto:contact@algorand.foundation">contact@algorand.foundation</a></td>
</tr>
</tbody>
</table>

8.2 Please note that if your Personal Data has been provided to us by a third party (e.g. your employer), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to the Foundation on your behalf.

8.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, the Foundation may not be in a position to continue to provide its products and services to you, or administer any contractual relationship in place, which in turn may also result in the termination of any agreements with the Foundation, and your being in breach of your contractual obligations or undertakings. the Foundation's legal rights and remedies in such event are expressly reserved.

9. GOVERNING LAW

This Privacy Policy shall be governed in all respects by the laws of Singapore.