

OffChain Luxembourg a.s.b.l. is a Luxembourg non-profit organisation whose social purpose is to facilitate communication, coordination, and collaboration among individuals seeking to leverage the unique characteristics of blockchain technologies and crypto-assets to achieve meaningful objectives (the “OCL”, “we”, “our”, “ours”).

In pursuit of this social purpose, OCL maintains a website that provides a comprehensive overview about us, our project, our team, and other relevant information. This website and its content are accessible at <https://offchain.lu> (the “Website”).

Furthermore, OCL may organise or co-organise, in collaboration with affiliated or partner organisations, various conferences, cultural events, fundraising initiatives, members’ meetings, seminars, training programs, workshops, and other gatherings (each, an “Event” and collectively, the “Events”).

Within this context, OCL may also engage in communications with various individuals—regarding complaints, inquiries, requests, and other messages—through multiple channels, such as the Website’s contact form, email, postal mail, and third-party applications, including WhatsApp and Telegram (collectively referred to as the “Correspondents”).

In light of the foregoing, this document (the “Privacy Policy”) sets out the policy applicable to the various processing operations that OCL carries out on information relating to identified or identifiable natural persons (the “personal data”).

The personal data concerning the following categories of natural persons are covered by this Privacy Policy:

- The Event Participants;
- The Members of OCL’s Board of Directors;
- The OCL Correspondents;
- The OCL Donors & Legatees;
- The OCL Members;
- The OCL Volunteers & Freelancers;
- The Service Providers and/or their Representatives;
- The Visitors of our Website;

(“you”, “your”, “yours”).

OCL processes your personal data in accordance with this Privacy Policy and in compliance with

- the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “GDPR”),
- the Luxembourg Law of 1 August 2018 on the organisation of the National Commission for Data Protection and the general regime on data protection, and
- the Luxembourg Law of 30 May 2005 concerning the protection of privacy in the electronic communications sector (the “ePrivacy Law”).

This Privacy Policy provides information on the personal data we collect, the purposes for which it is processed, the conditions under which it is stored, where it may be transferred, the rights you have over your personal data, and more specifically the following aspects:

- **Identity of the Controller and its Contact Details.**

Your personal data is processed under the responsibility of OffChain Luxembourg a.s.b.l. (abbreviated as “OCL”), a Luxembourg nonprofit association incorporated and having its registered office at 22, rue Antoine Hirsch, L-1752 Luxembourg, registered with the Luxembourg Trade and Companies Register under the number F14528.

In accordance with the provisions of the GDPR, OCL is the controller with respect to the processing of your personal data.

If you have any complaints, inquiries, or requests concerning the processing of your personal data, or if you wish to exercise any of the rights related to your personal data as outlined in this Privacy Policy, please contact OCL through our Website’s contact form, by e-mail at info@offchain.lu, or by postal mail at the address indicated above in this Section.

- **Processed Categories of Personal Data.**

OCL may collect, obtain and process the following categories of personal data concerning you:

- **Bank and Financial Data:** Bank account number, IBAN, SWIFT code, and bank name.
- **Communications Data:** Complaints, inquiries, requests, and other messages received and sent through multiple channels, such as the Website’s contact

form, email, postal mail, and third-party applications, including WhatsApp and Telegram, as well as all data contained therein.

- **Device Data:** Device operating system, device type (such as desktop, tablet, or mobile), and other technical details provided by the browser, such as screen resolution and supported technologies.
- **Donations and Legacies Data:** Nature and amount of donations, legal and banking documents, donation certificates or tax receipts, and related records (if applicable).
- **Education and Qualifications Data:** Curriculum vitae (CV), covering letter, level of education, diploma(s), language(s) spoken/written, IT or other skills, completed training courses.
- **Event Images Data:** Photos and videos captured during an Event.
- **Hobbies Data:** Personal activities, sports, interests and preferences.
- **Identification and Contact Data:** Surname, first name, ID card or passport and their respective information (including identification numbers, photo and height), signature, email address, postal address, and telephone number (if applicable).
- **Location Data:** IP address-based geolocation and, if explicitly permitted by the user, precise GPS geolocation.
- **Membership Data:** Membership applications, status (active, honorary, former), subscription records, payment of the annual membership fees, participation in the General Assembly (invitations, attendance, voting rights).
- **Personal Characteristics Data:** date and place of birth, age, gender, nationality.
- **Profession and Employment Data:** Current position, job title, employing company or undertaking.
- **Registration and Event Data:** Invitations, registrations, and participation records relating to Events, dietary restrictions (if a meal is provided).
- **Website Data:** cookies and data they collect, Internet Protocol (IP) address, browser type, browser settings (such as language preference and time zone), Website activity (such as date and time of access, pages and files viewed, searches performed, and features used), system activity logs (such as HTTP request and response data, session events, and, where applicable, basic error data if provided by the browser).

- **Sources From Which Your Personal Data Originate.**

The personal data we process may be collected or obtained from various sources:

- It is typically collected from you;
- It may be collected when you access and use our Website;
- In certain instances, OCL may obtain personal data from public authorities and regulatory bodies, or from affiliated or partner organisations (e.g., when co-organising joint events).

- **Purposes of the Processing and their Legal Basis.**

The table below is intended to inform you about the purposes of the processing carried by OCL, the legal basis for each of these purposes, as well as the categories of data subjects and of personal data that are involved in each purpose:

<u>Processing Number</u>	<u>Purposes of the Processing</u>	<u>Legal Basis for the Processing</u>	<u>Categories of Data Subjects Concerned</u>	<u>Categories of Personal Data Concerned</u>
<u>1</u>	<u>Compliance with Administrative, Fiscal and Legal Obligations (e.g., maintaining the register of members, register of beneficial owners, accounting records, declarations).</u>	<u>Processing is necessary for compliance with a legal obligation to which OCL is subject (Article 6.1(c) of the GDPR).</u>	<u>Donors & Legatees</u> <u>OCL Members (including Members of OCL's Board of Directors)</u> <u>Service Providers or their Representatives</u>	<u>Bank and Financial Data</u> <u>Identification and Contact Data</u> <u>Membership Data</u> <u>Personal Characteristics Data</u> <u>Profession and Employment Data</u>
<u>2</u>	<u>Complaints Management (e.g., consumer or crypto-assets holder/investor</u>	<u>Processing is necessary for compliance with a legal obligation to</u>	<u>Correspondents (which may include OCL Members)</u>	<u>Bank and Financial Data</u> <u>Communications Data</u>

	<u>complaints).</u>	<u>which OCL is subject (Article 6.1(c) of the GDPR).</u>		<u>Identification and Contact Data</u>
<u>3</u>	<u>Donations & Legacies Management (e.g., their receipt, potential reimbursement, declaration, accounting).</u>	<u>Processing is necessary for compliance with a legal obligation to which OCL is subject (Article 6.1(c) of the GDPR).</u>	<u>Donors & Legatees</u>	<u>Bank and Financial Data</u> <u>Donations and Legacies Data</u> <u>Identification and Contact Data</u> <u>Personal Characteristics Data</u>
<u>4</u>	<u>Events Management.</u>	<u>Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (Article 6.1(b) of the GDPR).</u> <u>We require this data from you, as it is necessary for the conclusion of the Event participation contract.</u>	<u>Event Participants</u>	<u>Communications Data</u> <u>Identification and Contact Data</u> <u>Registration and Event Data</u>

		<u>Without it, we will not be able to conclude the contract with you and you will not be able to participate in the Event.</u>		
<u>5</u>	<u>Human Resources.</u>	<p><u>Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (Article 6.1(b) of the GDPR).</u></p> <p><u>We require this data from you, as it is necessary for the conclusion of the mandate or freelance contract.</u></p> <p><u>Without it, we will not be able to conclude the contract with you.</u></p>	<p><u>Members of OCL's Board of Directors</u></p> <p><u>Volunteers & Freelancers</u></p>	<p><u>Bank and Financial Data</u></p> <p><u>Education and Qualifications Data</u></p> <p><u>Hobbies Data</u></p> <p><u>Identification and Contact Data</u></p> <p><u>Personal Characteristics Data</u></p> <p><u>Profession and Employment Data</u></p>
<u>6</u>	<u>Promotion of our activities, events, and meetings, as</u>	<u>Processing is based on the consent you have given to</u>	<u>Event Participants</u>	<p><u>Event Images Data</u></p> <p><u>Identification</u></p>

	<u>well as the individuals participating in them, on our Website and/or external platforms, including social networks (e.g., LinkedIn).</u>	<u>the processing of your personal data for a specific purpose (Article 6.1(a) of the GDPR).</u>		<u>and Contact Data</u> <u>Registration and Event Data</u>
7	<u>Membership Management (membership application, payment of the membership fee, etc.).</u>	<u>Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (Article 6.1(b) of the GDPR).</u> <u>We require this data from you, as it is necessary for the conclusion of the membership contract. Without it, we will not be able to conclude the contract with you and you will not be able to become an</u>	<u>OCL Members (including Members of OCL's Board of Directors)</u>	<u>Bank and Financial Data</u> <u>Identification and Contact Data</u> <u>Membership Data</u> <u>Personal Characteristics Data</u>

		<u>OCL Member.</u>		
<u>8</u>	<u>Reception, answer and management of inquiries, requests, and other messages, through multiple channels, such as the Website's contact form, email, postal mail, and third-party application, including WhatsApp and Telegram.</u>	<u>Processing is necessary for the purposes of the legitimate interests pursued by OCL (Article 6.1(f) of the GDPR): ensuring effective communication and handling requests.</u>	<u>Correspondents</u>	<u>Communications Data</u> <u>Identification and Contact Data</u>
<u>9</u>	<u>Website Analytics, Performance Monitoring and Personalisation.</u>	<u>Non-essential cookies, Website activity, System activity logs: Processing is based on the consent you have given to the processing of your personal data for a specific purpose (Article 6.1(a) of the GDPR ; Article 4.2(a) of the ePrivacy Law)</u>	<u>Visitors of our Website</u>	<u>Device Data</u> <u>Location Data</u> <u>Website Data</u>
<u>10</u>	<u>Website</u>	<u>Essential</u>	<u>Visitors of our</u>	<u>Device Data</u>

	<u>Communication & Functioning (conveyance of a proper communication and functioning of our Website and for the security of the OCL IT systems).</u>	<u>cookies, IP address and other data: Processing is necessary for the purposes of the legitimate interests pursued by OCL (Article 6.1(f) of the GDPR ; Article 4.3 of the ePrivacy Law): necessary for the conveyance of a proper communication and functioning of our Website and for the security of the OCL IT systems.</u>	<u>Website</u>	<u>Location Data</u> <u>Website Data</u>
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- **Categories of Recipients of Your Personal Data.**

In accordance with the purposes of the processing described above and on a need-to-know basis, we may disclose some personal data with the following categories of recipients:

- **Internal recipients:** members of the OCL’s Board of Directors, including its President, Vice-President(s), Secretary and Treasurer.
- **External recipients** including, where applicable, the following third parties:
 - Affiliated or partner organisations co-organising joint Events with OCL.
 - Event service providers, where required for Event registration, ticketing, security, or related operational needs.

- Financial entities, including crypto-asset service providers (CASPs), banks and payment service providers, where necessary for processing transactions, grants, or funding-related matters.
- Insurance providers, where applicable, to cover liabilities, events, or staff-related policies.
- Public authorities and regulatory bodies, such as the Luxembourg Business Registers (LBR) that manages the information available on the Luxembourg Trade and Companies Register (RCS) and the Luxembourg Register of Beneficial Owners (RBE), the Luxembourg Inland Revenue (ACD), the Registration Duties, Estates and VAT Authority (AED), the Social Security Center (CCSS), the National Health Fund (CNS), and any other competent national or EU authority, including judicial or law enforcement bodies.
- Publishers and providers of external platforms, including social networks (e.g., LinkedIn).
- Specific service providers, including IT service providers (hosting, email, communication applications), accounting service providers (for administrative and fiscal tasks), Marketing agencies (for communication, outreach, and promotional activities), Legal advisors and compliance consultants (for legal, regulatory and governance matters).
- **Transfers of Your Personal Data.**

In principle, your personal data is stored in Luxembourg and/or within the European Economic Area (“EEA”). Consequently, it is not subject to transfer to a third country outside the EEA or to an international organisation.

However, if necessary for the purposes outlined in this Privacy Policy, we may need to transfer your personal data to countries outside the EEA. Some of these countries, such as the United States, are covered by an adequacy decision of the European Commission and are therefore considered to provide an adequate level of data protection.

In the absence of such an adequacy decision, OCL ensures that appropriate safeguards are implemented for the processing of your data (including standard contractual clauses) and/or that the processing is conducted in full compliance with the requirements of the GDPR.

- **Storage Periods of Your Personal Data.**

The storage periods for the processing of personal data are determined based on the purposes outlined in Section 4 of this Privacy Policy. Personal data will not be processed for longer periods than necessary to fulfil these purposes, except for cases where retention is required in order for the OCL establishment, exercise or defence of legal claims in cases of legal disputes.

The table below provides an overview of the storage periods applicable to each of these purposes:

<u>Processing Number</u> <u>(See above)</u>	<u>Purposes of the Processing</u>	<u>Storage Periods</u>
<u>1</u>	<u>Compliance with Administrative, Fiscal and Legal Obligations (e.g., maintaining the register of members, register of beneficial owners, accounting records, declarations).</u>	<u>Ten (10) years from the end of the relevant financial year, or from the date the OCL Member left or was excluded from the OCL's Board of Directors or from the OCL association altogether, whichever is applicable.</u>
<u>2</u>	<u>Complaints Management (e.g., consumer or crypto-assets holder/investor complaints).</u>	<u>Ten (10) years from the end of the relevant financial year where the complaint was received.</u>
<u>3</u>	<u>Donations & Legacies Management (e.g., their receipt, potential reimbursement, declaration, accounting).</u>	<u>Ten (10) years from the end of the financial year in which your donation or legacy was made to OCL, or from the end of the ownership period in the case of a real estate legacy or a legacy subject to conditions, whichever is applicable.</u>
<u>4</u>	<u>Events Management.</u>	<u>Three (3) years from the end of the financial year in which the Event you participated in took place.</u>
<u>5</u>	<u>Human Resources.</u>	<u>Three (3) years from the end of the</u>

		<u>financial year in which your mandate, volunteer agreement, or freelance contract with OCL ended.</u>
<u>6</u>	<u>Promotion of our activities, events, and meetings, as well as the individuals participating in them, on our Website and/or external platforms, including social networks (e.g., LinkedIn).</u>	<u>Until you withdraw your consent to the processing given to OCL, or ten (10) years from the date where you gave your consent for the processing to OCL, whichever occurs first.</u>
<u>7</u>	<u>Membership Management (application and/or payment of the membership fee).</u>	<u>One (1) year from the date where:</u> <u>- The OCL Member has informed OCL of its decision to leave OCL.</u> <u>- OCL has effectively excluded the OCL Member, including for non-payment of the annual membership fee.</u>
<u>8</u>	<u>Reception, answer and management of inquiries, requests, and other messages, through multiple channels, such as the Website's contact form, email, postal mail, and third-party application, including WhatsApp and Telegram.</u>	<u>Ten (10) years from the date the personal data was collected.</u>
<u>9</u>	<u>Website Analytics, Performance Monitoring and Personalisation.</u>	<u>Until you withdraw your consent to the processing given to OCL, or six (6) months from the date where the personal data was first collected (based on the consent you gave to OCL), whichever occurs first.</u>
<u>10</u>	<u>Website Communication & Functioning (conveyance of a proper communication and functioning of our Website and for the</u>	<u>Twelve (12) months from the date where the personal data was first collected based on the legitimate interests pursued by OCL.</u>

	<u>security of the OCL IT systems).</u>	
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- **Existing Rights over Your Personal Data.**

In accordance with the GDPR, any data subject whose personal data is processed by OCL has the following rights:

- **Right to withdraw your consent to the processing of your personal data** (Article 7.3 of the GDPR). Where the processing of your personal data is based on the consent you have given to OCL, you have the right to withdraw this consent at any time. However, this withdrawal does not affect the lawfulness of processing based on the consent given before the withdrawal.
- **Right of access to your personal data** (Article 15 of the GDPR). You have the right to (i) obtain confirmation from OCL as to whether or not your personal data is being processed, and where that is the case, (ii) request to OCL a copy of said data along with the information on its processing (e.g., the purposes of the processing, the categories of personal data concerned, the recipients, the storage period).
- **Right to the rectification of your personal data** (Article 16 of the GDPR). You have the right to obtain from OCL the rectification of inaccurate personal data concerning you, as well as the completion of incomplete personal data.
- **Right to erasure of your personal data** (Article 17 of the GDPR). You have the right to obtain from OCL the erasure of all or part of your personal data, but only where one of the grounds set out in article 17, paragraph 1, of the GDPR is applicable.
- **Right to restrict the processing of your personal data** (Article 18 of the GDPR). You have the right to obtain from OCL the restriction of processing of your personal data, but only where one of the grounds set out in article 18, paragraph 1, of the GDPR is applicable.
- **Right to the portability of your personal data** (Article 20 of the GDPR). Where processing is based on the consent you have given to OCL or on its necessity for the performance of a contract, and where such processing is carried out by automated means, you have the right (i) to receive all or part of the personal data you have provided to OCL in a structured, commonly used and

machine-readable format, and (ii) to transmit or have those data transmitted to any third party of your choice without hindrance from OCL.

- **Right to object to the processing of your personal data** (Article 21 of the GDPR): You have the right to object to the processing of your personal data but only (i) on grounds relating to your particular situation and (ii) where such processing is based (a) on the performance of a task carried out in the public interest or in the exercise of official authority vested in OCL, or (b) on the legitimate interests pursued by OCL or by a third party.

In such cases, OCL will no longer process your personal data unless OCL demonstrates legitimate grounds (a) for the processing which override your interests, rights and freedoms, or (b) for the establishment, exercise or defence of legal claims.

- **Right to lodge a complaint with a supervisory authority** (Article 77 of the GDPR): You have the right to lodge a complaint with a supervisory authority, in particular with the competent supervisory authority of the EU Member State where you have your habitual residence, place of work or of the alleged infringement of the GDPR. For the Grand Duchy of Luxembourg, the competent supervisory authority is the *Commission Nationale pour la Protection des Données* (CNPD).

Except for the last right described above, you may exercise your rights by submitting, in writing, a request to OCL using the contact details provided in the following Section of this Privacy Policy. Where applicable, your request should include the necessary information to confirm your identity.

If the natural person submitting a request refuses to provide additional information necessary to confirm its identity whenever OCL has reasonable doubts in this regard, or if such a request is manifestly unfounded or excessive because of its repetitive character, OCL may (i) refuse to act on the request, or (ii) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested.

- **Contact Details to Exercise Your Rights.**

To address your complaints, inquiries, or requests regarding the processing of your personal data, or to exercise any of the rights related to your personal data as outlined in this Privacy Policy, you may contact OCL, through our Website's contact form, by e-mail at Info@offchain.lu , or by postal mail at the address indicated above in Section 1 of this Privacy Policy.

Should you remain unsatisfied with our responses after contacting us and consider that the processing of your personal data by OCL infringes the GDPR, you may lodge a complaint with the competent supervisory authority. For the Grand Duchy of Luxembourg, the competent supervisory authority is the *Commission Nationale pour la Protection des Données* (CNPD).

- **Organisational and Security Measures.**

OCL undertakes to implement the appropriate technical and organisational measures to ensure a level of security of personal data appropriate to the risks that are presented by the processing.

In particular, OCL takes technical and organisational measures to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

Notwithstanding our efforts to implement appropriate technical and security measures, the transmission of data over the internet (including by email) is never entirely secure. While we strive to protect your personal data, OCL cannot guarantee its absolute security during transmission.

- **Modifications to this Privacy Policy.**

OCL reserves the right to amend or update this Privacy Policy at any time, including to reflect changes in legal requirements, on its operations, or on its data processing practices.

The latest version will always be available on our Website, and you are encouraged to review it regularly. Where required by applicable law, we will provide notice of material changes and, where applicable, seek your consent.