

# Nexus Mutual Privacy Policy

## 1. Introduction

Nexus Mutual and its affiliates (hereinafter, "Nexus Mutual", "the Company", "we", "us" or "our") are committed to protecting and respecting your privacy. This Privacy Policy will explain how our organization uses the Personal Data we collect from you when you use our website and services. By accessing Nexus Mutual you are consenting to the information collection and use practices described in this Privacy Policy.

If you reside within the European Union (EU), European Economic Area (EEA), or Switzerland, Collective Risk Services CIC will be the data controller responsible for processing Your Information. See the Contact section of this Privacy Policy for details.

This Privacy Policy applies to the operations of Nexus Mutual in the European Economic Area (EEA). It gives you rights by operation of the EU GDPR. If you live outside the EEA, Nexus Mutual will undertake best efforts to give you a similar degree of control over your privacy.

## 2. Personal Data

"Personal Data" is information that identifies you personally or by which your identity can reasonably be ascertained. We collect Personal Data in order to:

- Provide our services efficiently and effectively;
- Develop, enhance, market and deliver products and services to you;
- Provide information to you about developments and new products, including changes and enhancements to the Site;
- Provide you with news and other matters of general interest to you about Nexus Mutual
- Comply with Nexus Mutual's legal and regulatory requirements

## 3 How we use Personal Data

### 3.1 When visiting our website

We may collect World Wide Web related information, including but not limited to IP Addresses, operating system and browser type as a result of your interactions with Nexus Mutual.

This data may be processed in order to deliver the content of our website correctly, to optimize the content of our website to ensure the long-term viability of our information technology systems and website technology, and to provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

### 3.2 When becoming a Nexus Mutual member

Personal data may be collected if you apply and/or act as a member of Nexus Mutual.

#### 3.2 a) KYC and AML verification

If you apply to become a member of Nexus Mutual, you will be asked to verify your identity using our Know-Your-Customer (hereinafter “KYC”) and Anti-Money-Laundering (hereinafter “AML”) verification processes.

Personal data required for KYC/AML verification is processed and stored by a third party verification company Acuant, Inc (hereinafter, “Acuant”) and may include:

- Your full name
- Date of birth
- Address
- Email address
- Phone number
- Digital copy of your identification document

#### 3.2 b) Nexus Mutual User Database

Nexus Mutual retains the following information of its members in a user database :

- Full name
- E-mail address
- Ethereum wallet address

- Status of KYC/AML verification
- Case ID of KYC/AML verification
- Date of membership application
- Date of membership withdrawal

### 3.3 Using the Nexus Mutual application and the Ethereum blockchain

When using the Nexus Mutual application (<https://app.nexusmutual.io/>) through actions that may include but are not limited to:

- membership application and/or withdrawal;
- purchasing cover;
- staking;
- governance voting;
- claims assessment;

members of Nexus Mutual interact with the Ethereum blockchain and/or any other public blockchains that provide full transparency to past and current transactions. Nexus Mutual is not responsible for preventing or managing information broadcasted on a blockchain. Decisions to transact on a blockchain and/or sharing information related to your blockchain wallet addresses rests with you.

## 4. Use of Third Party Applications

### 4.1 Amazon Web Services

We use Amazon Web Services (AWS) to store log and database data as described in paragraph 3. For further information and the applicable data protection provisions of AWS please visit <https://aws.amazon.com/privacy/>

### 4.2 Acuant

We use Acuant Compliance for the KYC/AML verification as described in paragraph 3.2a. More information about Acuant can be found on their website (<https://www.acuant.com/>).

## 4.3 Links

We link to social media profiles, articles and documentation that are hosted by other services. Those services might also collect Personal Data. Please refer to their respective privacy policies for more information:

- Github: <https://docs.github.com/en/github/site-policy/github-privacy-statement>
- GitBook: <https://policies.gitbook.com/privacy>
- Medium: <https://medium.com/policy/medium-privacy-policy-f03bf92035c9>
- Twitter: <https://twitter.com/en/privacy>
- Discord: <https://discord.com/privacy>
- Telegram: <https://telegram.org/privacy>
- Discourse Forum: <https://www.discourse.org/privacy>

## 4.7 Support Channels

Nexus Mutual uses different channels including but not limited to Telegram, Discord, Twitter to provide support, answer questions, and resolve any issues raised by its users. By accepting this Privacy Policy, you are deemed to consent to provide the following Personal Data to persons looking to resolve any dispute:

- E-mail address
- Blockchain wallet address
- Detailed description of the issue
- Date and time that the issue arose
- Outcome sought

## 5. Data Sharing

We may make available the Personal Data that you provide to us to our business partners, administration centers, third-party service providers, agents, subcontractors, and other organisations for the purposes of completing tasks and providing services to you. We reserve the right to disclose Personal Data that we believe, in good faith, is appropriate or necessary to enforce our Terms of Use, take precautions against liability or harm, to investigate and respond to third-party claims or allegations, to respond to a court order, comply with any legal obligation

or to protect security or integrity of Nexus Mutual and to protect the rights, property or safety of Nexus Mutual, our uses or others. We will take steps to ensure that your privacy rights continue to be protected.

In the event that Nexus Mutual is involved in a merger, acquisition, sale, bankruptcy, insolvency, reorganization, receivership, assignment or the application of laws or change of control, there may be a disclosure of your information to another entity related to such an event.

## 6. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. Data Storage

We retain your Personal Data only for as long as is necessary for us to do so, with regards to the purposes described in this Privacy Policy and where retention is necessary for compliance to legal and regulatory requirements.

In general, Personal Data relating to your KYC/AML verification as described in paragraph 3 is held for a period of six months by the third party company and membership data for a period of five years post membership withdrawal.

## 8. Your Rights as a Data Subject

You have certain rights under applicable legislation, and in particular under Regulation EU 2016/679 (General Data Protection Regulation or 'GDPR'), as explained below.

### 8.1 Information & Access:

You have the right to request Our Company for copies of your personal data.

### 8.2 Rectification:

You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.

### 8.3 Erasure:

You have the right to request that Nexus Mutual erase your personal data under the following circumstances:

- the personal data is no longer necessary for the purpose for which it was collected;
- we unlawfully processed your personal data; and
- erasure is required to comply with a legal obligation that applies to us.

We will proceed to comply with an erasure request without delay unless continued retention is necessary for:

- Exercising the right of freedom of expression and information;
- Complying with a legal obligation under EU or other applicable law;
- The performance of a task carried out in the public interest;
- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- The establishment, exercise, or defence of legal claims.

As described in paragraph 3.3, Nexus Mutual is unable to erase or amend any information that has been stored on a public blockchain as a result of your interactions with Nexus Mutual.

#### 8.4 Restrict & Object to Processing:

You have a right to restrict and object to processing of your personal data, such as where:

- you contest the accuracy of the personal data;
- where processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed personal data;
- we no longer need to process your personal data but need to retain your information for the establishment, exercise, or defence of legal claims.

#### 8.5 Data Portability

Where the legal basis for our processing is your consent or the 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, you have a right to receive the personal data you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

#### 8.6 Access

You have the right to access data we hold about you. We are happy to provide you with details of your Personal Data that we hold or process. To protect your personal data, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us via the methods described in paragraph 10. We aim respond to your request within 30 days.

## 9. Changes to This Privacy Policy

We may make changes to this Privacy Policy. We encourage you to review the Policy whenever you access or use our website to stay informed about our information practices and the choices available to you. If you do not agree to the revised Policy, you should discontinue your use of Nexus Mutual's website and services.

This Privacy Policy was last changed on March 24th, 2021.

## 10. Contact Us

This website is owned and operated by Collective Risk Services CIC. We are registered in the United Kingdom under registration number 11353187, and our registered office is located at:

27 Old Gloucester Street, London, United Kingdom, WC1N 3AX

If you have any questions, comments, or concerns regarding our Privacy Policy and/or practices, please contact us at:

E-Mail: [info@nexusmutual.io](mailto:info@nexusmutual.io)