

# Privacy Policy for SFI Testnet

## 1. Introduction

- 1.1. [Singularity Finance] (referred to herein as "Company," "we," or "us"), the confidentiality and security of your personal information are our highest priorities. This Privacy Policy has been carefully designed to ensure clarity and transparency regarding the manner in which your data is collected, utilised, disclosed, and safeguarded during your engagement with the SFI Testnet ("Testnet"). Our commitment to data protection adheres to international legal frameworks, including the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA), among others.
- 1.2. By accessing or using the Testnet, you confirm your understanding of and agreement to the terms outlined in this Privacy Policy. Regular review of this document is encouraged, as any changes will be communicated through official channels.
- 1.3. This Privacy Policy governs all personal data collected through your interactions with the Testnet, including but not limited to registration, participation in activities, and use of integrated third-party services.

## 2. Information We Collect

- 2.1. The Company values transparency in its data collection practices. Below is a detailed description of the types of data collected and how it is gathered.
- 2.2. Information Provided Directly by You: Participants provide the following types of data voluntarily:
  - 2.2.1. Registration Data:
    - 2.2.1.1. Personal identifiers such as your email address to facilitate account creation, recovery, and communication.

- 2.2.1.2. Blockchain wallet addresses essential for processing Testnet transactions and distributing rewards.
    - 2.2.1.3. Optional phone numbers for enhanced account security via two-factor authentication.
  - 2.2.2. Activity Data:
    - 2.2.2.1. Logs of your participation in Testnet activities, including tasks completed, rewards claimed, and leaderboard engagements.
    - 2.2.2.2. Feedback, surveys, and issue reports submitted through official channels.
- 2.3. Automatically Collected Information: Automated systems collect data to monitor and enhance platform functionality, including:
  - 2.3.1. Technical Metrics:
    - 2.3.1.1. Device-specific details such as operating system type, browser version, and unique identifiers.
    - 2.3.1.2. Connection data, including IP addresses, approximate geolocation, and network latency statistics.
  - 2.3.2. Behavioural Insights:
    - 2.3.2.1. Patterns of interaction with the platform, such as navigation paths, time spent on pages, and engagement with specific features.
    - 2.3.2.2. Performance data from gamified elements, including streak tracking and leaderboard standings.
- 2.4. Third-Party Integrations: Participants who opt to integrate external services with the Testnet may provide additional information, including:
  - 2.4.1. Social media profiles and activities linked to the Testnet.
  - 2.4.2. Metrics shared by analytical tools or reward management systems are employed to optimise user experiences.

- 2.5. Aggregated and Anonymised Data: Aggregated data is generated for statistical analysis, trend evaluation, and platform improvement. This data is processed in a manner that prevents the identification of individual users.
- 2.6. Sensitive Information: The Company does not intentionally collect sensitive personal data, such as financial, health-related or biometric information unless explicitly authorised and necessary for specified functionalities.

### **3. How We Use Your Information**

- 3.1. The information collected serves to enhance the overall functionality, security, and user experience of the Testnet.
- 3.2. The data is employed to facilitate seamless access to the Testnet's features, including token faucets, decentralised exchanges, and analytics dashboards. Furthermore, gamified functionalities such as leaderboard rankings, badges, and streak tracking are enabled through this data.
- 3.3. Communication with participants is a core aspect of our data usage. Participants are notified of updates regarding their progress, leaderboard standings, and task completions. In addition, we provide important advisories related to system security, platform updates, and upcoming Testnet events. Our support team ensures that inquiries, feedback, and technical concerns are addressed promptly.
- 3.4. Data plays a critical role in safeguarding the Testnet against fraudulent activities. Monitoring ensures the detection and mitigation of unauthorised access or violations of platform policies. Advanced security protocols are in place to protect user data and maintain platform integrity.
- 3.5. Research and development efforts leverage anonymised datasets to improve user experience, optimise platform functionality, and advance scalable blockchain solutions. These insights guide the continuous evolution of the Testnet.
- 3.6. Compliance with legal and regulatory obligations is paramount. The data collected enables the Company to fulfil statutory requirements, respond to legal inquiries, and protect both the Company's and users' rights, as well as public safety.

### **4. Data Sharing and Disclosure**

- 4.1. The Company exercises diligence in sharing or disclosing user data, ensuring that such actions align with operational, legal, and contractual obligations.
- 4.2. Internally, access to user data is strictly limited to authorised personnel who require it to manage platform operations, enhance features, or address user concerns.
- 4.3. The Company collaborates with third-party service providers for hosting, infrastructure management, analytics, and incentivisation processes. These providers are contractually bound to adhere to stringent data protection standards.
- 4.4. Data may be disclosed in compliance with legal obligations, such as responding to subpoenas, court orders, or other lawful requests. Such disclosures are made to safeguard the rights, safety, and welfare of participants and the broader community.
- 4.5. In the context of corporate transactions, such as mergers, acquisitions, or asset sales, user data may be transferred, provided that confidentiality agreements ensure its protection.
- 4.6. Beyond the specified purposes, any data sharing will require the explicit and informed consent of participants.

## **5. Data Retention**

- 5.1. The Company retains personal data only for as long as necessary to fulfil the purposes outlined in this Privacy Policy.
- 5.2. Data associated with active Testnet participation is retained for the duration of the engagement. Transaction records and other legally mandated data may be stored for extended periods to satisfy regulatory requirements.
- 5.3. Archival practices ensure that inactive user data is securely stored with limited access. Regular audits determine whether such data should be retained or deleted.
- 5.4. Participants may request the deletion of their personal data. While the Company endeavours to honour such requests, legal or operational constraints may necessitate retention.

## **6. Security Measures**

- 6.1. The Company employs robust security protocols to safeguard user data against unauthorised access, misuse, or loss.
- 6.2. Advanced encryption methods protect sensitive transactional and personal information. Firewalls, intrusion detection systems, and regular security audits further enhance system integrity.
- 6.3. Access management protocols, including multi-factor authentication, restrict data access to authorised personnel. Logs are continuously monitored to detect and respond to unauthorised activities.
- 6.4. The Company promotes user awareness through educational resources on secure wallet management, phishing prevention, and other protective measures. Participants are regularly updated on emerging threats and recommended security practices.

## **7. Participant Rights**

- 7.1. Participants possess several rights regarding their personal data, as enshrined in applicable privacy laws.
- 7.2. Participants may request access to their personal data and seek rectification of inaccuracies. Copies of data in structured, machine-readable formats may also be provided for portability purposes.
- 7.3. Where permissible by law, participants may restrict the processing of their data or request its deletion. They are also entitled to lodge complaints with relevant data protection authorities if they believe their rights have been infringed.

## **8. International Data Transfers**

- 8.1. The Company ensures that international data transfers comply with stringent legal and regulatory requirements. Transfers are safeguarded through mechanisms such as Standard Contractual Clauses and Binding Corporate Rules. Participants are notified of such transfers and the measures implemented to protect their information.

## **9. Updates to This Privacy Policy**

- 9.1. This Privacy Policy is subject to periodic revisions to reflect changes in operational practices or regulatory requirements. Participants will be informed of significant updates through official Testnet communication channels.

## **10. Contact Information**

- 10.1. For further information or assistance regarding this Privacy Policy, participants may contact our support team at [support@singularityfinance.ai]. For escalated concerns, the Data Protection Officer can be reached at [support@singularityfinance.ai].