

PRIVACY POLICY

This Privacy Policy is declared by OriginTrail, digitalne rešitve za dobavne verige, d.o.o., located at Vojkova cesta 63, 1000 Ljubljana, Slovenia.

Introduction

By accessing or using the website, you accept and undertake to be bound by the Privacy Policy and Terms and Conditions. If you do not accept this Privacy Policy and or Terms and Conditions, do not access and/or use the website.

If you have any questions relating to this Privacy policy or Terms and Conditions, you can contact us through the email address: office@origin-trail.com.

By using the website, you agree that you are of the age of majority.

1. Definitions

- 1.1. "We/us/our" refers to OriginTrail, digitalne rešitve za dobavne verige, d.o.o., located at Vojkova cesta 63, 1000 Ljubljana, Slovenia.
- 1.2. "Website" means the websites governed by us and located at <https://origintrail.io> or any other URL, which may replace it.
- 1.3. "You/your/yours" refers to the user of the website.
- 1.4. "Users" means the users of the website collectively.
- 1.5. "Cookies" means small text files that our website places on your computer's hard drive to enable information about your browsing session and to identify your computer.
- 1.6. "Personal Information" means the information provided by you, as well as any information regarding your behavior on the website.
- 1.7. "Data Controller" means OriginTrail, digitalne rešitve za dobavne verige, d.o.o., located at Vojkova cesta 63, 1000 Ljubljana, Slovenia.
- 1.8. "Data Processor" means a natural or legal person or public authority, which processes personal data on behalf of OriginTrail, digitalne rešitve za dobavne verige, d.o.o., located at Vojkova cesta 63, 1000 Ljubljana, Slovenia.

- 1.9. “Third Party” means a natural or legal person or public authority who, under the direct authority of OriginTrail, digitalne rešitve za dobavne verige, d.o.o., located at Vojkova cesta 63, 1000 Ljubljana, Slovenia, is authorized to process personal data.
- 1.10. “Consent” means any freely given, specific, informed and unambiguous indication of your wish, by which you, by a statement or by a clear affirmative action, signify agreement to the processing of your personal data.

2. General principles

We are committed to protecting the privacy of our users. We have implemented various technical and organizational measures in order to help protect the security and confidentiality of your personal data, taking into account the nature, scope, context, and purposes of processing, as well as state-of-the-art. Although we strive to protect your personal data, no system can be 100% secure. Therefore, we cannot ensure or warrant the security of your personal data against unpredictable or unauthorized access or loss.

At the beginning of a session on the website, each user is assigned with session cookie for identification. For the purpose of providing security, we also collect IP addresses from users accessing the website.

On your computer, we might store the cookies of Google Analytics (analysis of website visits) and similar analytics services.

All the above-mentioned information, except cookies, is stored permanently. Session cookies are stored only for the duration of the visit and are deleted upon user inactivity. Persistent cookies are stored on the visitor's computer.

3. Information we collect and why we collect it

We collect information you provide for different purposes.

3.1. Subscription to the OriginTrail newsletter

When you subscribe to the OriginTrail newsletter on our website, we collect the following information you provide us with:

- Your email;
- Your IP.

We will use the collected information for:

- Sending you a newsletter with updates from our company and the OriginTrail ecosystem.
- Communication with you.

- Sending you surveys and other questionnaires to receive your opinion.
- Statistical analysis in anonymised summary form.

We will collect your data as long as you are subscribed to our newsletter. You can unsubscribe from the newsletter at any time by clicking the highlighted link »unsubscribe« at the end of the newsletter or by contacting us directly at office@origin-trail.com.

We use MailerLite to manage our email marketing subscriber list and to send emails to our subscribers. MailerLite is a third-party provider that may collect and process your data using industry-standard technologies to help us monitor and improve our newsletter. MailerLite's privacy policy is available at <https://www.mailerlite.com/legal/privacy-policy>.

3.2. Contacting us through the Partnership and Media Inquiries form

When you contact us through the Partnership and Media Inquiries form on our website, we collect:

- Your role (Enterprise, Builder, or Media);
- Your first and last name;
- Your email;
- Name of the organization you are associated with;
- Any information you share on the website under the "Additional comments or questions" section of the form (including, but not limited to, information about your business);
- Your IP.

We will use the collected information for:

- Sending you the information or resources you requested.
- Sending you a newsletter with updates from the OriginTrail ecosystem.
- Communication with you.
- Sending you surveys and other questionnaires to receive your opinion.
- Internal statistical analysis.

We use HubSpot to manage our email marketing and communication with our contacts. HubSpot is a third-party provider that may collect and process your data using industry-standard technologies to help us monitor and improve our communication and marketing activities. HubSpot's privacy policy is available at <https://legal.hubspot.com/privacy-policy>.

We also use MailerLite to manage our email marketing subscriber list and to send newsletters to our contacts. MailerLite is a third-party provider that may collect and process your data using industry-standard technologies to help us monitor and improve our newsletter. MailerLite's privacy policy is available at <https://www.mailerlite.com/legal/privacy-policy>.

3.3. Participation in the giveaways organized by us

When entering the giveaways, we collect the following information you provide us with:

- Your first name and last name;
- Your email address;
- Your registered postal address;
- Nationality;
- Tax number or other equivalent identification;
- Number and type of your government-issued ID.

We will use the collected information for:

- Communication with you.
- Conducting the giveaway at all stages.
- Fulfilling our legal obligations.
- Fulfilling our other legitimate interests.
- Internal statistical analysis.

3.4. Participation in open calls organized by us

When participating in our open calls, we collect the following information you provide us with:

- Your first name and last name;
- Your email address;
- The name of the legal entity you are associated with, its registered address, and its identification number;
- Any information included in the open call application you submit to us;
- Any information you share on the website (including, but not limited to, information about your business).

We will use the collected information for:

- Communication with you;
- Conducting the open call at all stages;
- Fulfilling our legal obligations;
- Fulfilling our other legitimate interests;

- Internal statistical analysis.

By submitting the application for an open call, you explicitly agree that your personal information may be published on our communication channels in the event you are a member of the winning team.

4. How long do we keep information about you

We retain your personal data for as long as necessary to fulfill the purposes for which your personal data was collected, except when further data retention otherwise complies with relevant legal or operational retention needs.

5. Third-party privacy policies

Please note that through our website, you can access or have access to the websites that may be subject to certain third-party terms and conditions and privacy policies. Some functionalities might also be embedded in the website. You recognize and agree that we are not liable for any such third-party terms and conditions and their use of your personal information to the fullest extent permitted by applicable law.

6. With whom do we share your personal data

We take necessary measures to ensure that only our authorized personnel will have access to your personal data in order to fulfill the purposes for which your personal data was collected.

We may share your personal data with our affiliated companies, our trusted third-party service providers, professional advisors, and auditors. We choose our data controllers carefully and only upon sufficient guarantees that they have appropriate technical and organizational measures in place. Our third-party partners are subject to confidentiality requirements and may use your personal data solely to the extent necessary to fulfill the purpose for which your personal data was collected, except as otherwise required by law.

We may share your personal data with the public, legal, and other authorities in response to legal requests, such as a subpoena, warrant, or other orders issued by law enforcement authorities.

We may store and process your personal data in data centers around the world, where our affiliate companies or our facilities, or our third-party providers are located, thus we may transfer your personal data outside the EEA. Such transfers are undertaken under our legal obligations.

7. Sharing your information for marketing purposes

Where permissible according to applicable law we may use certain limited personal information about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook or Google, or marketing automation tools such as MailerLite to generate leads, drive traffic to our websites or otherwise promote our products and services. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of interest to you.

The social media platforms with which we may share your personal data are not controlled or supervised by us. Therefore, any questions regarding how your social media platform service provider processes your personal data should be directed to such provider.

Please note that you may, at any time, ask us to cease processing your data for these direct marketing purposes by sending an e-mail to office@origin-trail.com.

8. List of cookies we use

8.1. Google Analytics

Google Analytics is a web analytics service that provides statistics and basic analytical tools on the use of our website for search engine optimization and marketing purposes.

More info at: <https://policies.google.com/technologies/cookies>

Cookie Name	Expiration Time	Description
_ga	2 years	Used to distinguish users.
ga< container-id >	2 years	Used to persist session state.

8.2. Microsoft Clarity

Clarity is a behavioral analytics tool that helps us understand user interaction with our website. By allowing Clarity cookies, you help us enhance the user experience on our website. When accepting Clarity's cookies, the cookies send us non-personally identifiable information about your use of the website.

More info at: <https://learn.microsoft.com/en-us/clarity/setup-and-installation/cookie-list>

Cookie Name	Purpose
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_clck	Persists the Clarity User ID and preferences, unique to that site is attributed to the same user ID.
_clsk	Connects multiple page views by a user into a single Clarity session recording.
CLID	Identifies the first-time Clarity saw this user on any site using Clarity.
ANONCHK	Indicates whether MUID is transferred to ANID, a cookie used for advertising. Clarity doesn't use ANID and so this is always set to 0.
MR	Indicates whether to refresh MUID.
MUID	Identifies unique web browsers visiting Microsoft sites. These cookies are used for advertising, site analytics, and other operational purposes.
SM	Used in synchronizing the MUID across Microsoft domains.

8.3. Control over Cookies

User consent is required for obtaining and using certain cookies. You can always change your decisions on the acceptance or rejection of using cookies. These settings are usually located in the menu bar of your Internet browser Tools > Internet Options, the "privacy" or "security". There, users can change the settings for which types of cookies they would like to block.

In your browser, you can also delete cookies. Cancellation is usually available in the toolbox, under the "Clear Browsing Data" (usually a window can also display the CTRL + Shift + Del), and selecting "Delete cookies". Some browsers can generally reject the use of cookies by ticking the "do not follow me" or "do-not-track".

9. Contact information, data access, correction, deletion, and opt-out

You can contact us at any time to:

- Answer any of your questions about how we are using your personal data.
- Request access to information that we have on you, including being provided with a copy of your personal data.
- Request to receive your personal data in a machine-readable format and/or transmit your personal data to another controller.
- Request the restriction of the processing of your personal data.
- Withdraw your consent to the processing of your personal data (when we are processing your personal data based on your consent).

- Correct any information that we have about you.
- Delete the information that we have about you.
- Complain to your local supervisory authority (Information Commissioner of the Republic of Slovenia).

You can contact us via office@origin-trail.com.

10. Changes to Our Privacy Policy

All changes to this Privacy Policy are effective when they are posted on this page. When we materially change the policy, we will let you know via email and/or a prominent notice on our website, prior to the change becoming effective, and update the 'effective date' at the bottom of this page.

Issued in Ljubljana, April 2025.

Date of last revision of this Privacy Policy: April 07, 2025

OriginTrail, digitalne rešitve za dobavne verige, d.o.o. Tomaž Levak, director

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