

# Asterizm Privacy Policy

## 1. Introduction

Welcome to Asterizm, a project operated by AstroTech Labs Ltd, a company incorporated in the British Virgin Islands with its registered address at: Charles Court, 1st Floor, 189 Main Street, PO Box 4406, Tortola VG1110, British Virgin Islands (“Asterizm”, “we”, “us”, or “our”).

This Privacy Policy explains how we collect, use, disclose, and safeguard information when you access or use:

- the Asterizm website (the “Site”), and
- the Asterizm Solutions, meaning the suite of blockchain-based smart contracts deployed on supported blockchain networks together with any related off-chain software, APIs, backend services, and infrastructure operated or provided by Asterizm.

The Site and the Asterizm Solutions are collectively referred to as the “Services”.

Asterizm operates in a decentralized, permissionless, and non-custodial manner. We aim to minimize data collection and align with Web3 privacy principles. We do not collect or store personal data unless it is necessary for specific, limited purposes described in this Privacy Policy.

This Privacy Policy forms part of and is incorporated into the Terms of Use.

The most current version of these Terms is available at:  
<https://asterizm.io/privacy-policy.pdf>

## 2. Acceptance of This Privacy Policy

By accessing or using the Services, you acknowledge that you have read and understood this Privacy Policy and agree to its terms.

Where required by applicable law, we will request your explicit consent before collecting or processing personal data. If you do not agree with this Privacy Policy, you must stop using the Services.

The Services are not directed to children. We do not knowingly collect personal data from individuals under the minimum age required by applicable law (including under 13 years old where relevant). If we become aware that such data has been collected, we will delete it promptly.

### 3. Definitions

- “Personal Data” means information that identifies or can reasonably be linked to an identifiable individual.
- “Processing” means any operation performed on Personal Data, such as collection, use, storage, disclosure, or deletion.
- “Controller” refers to AstroTech Labs Ltd, which determines the purposes and means of Processing Personal Data.
- “Processor” refers to third parties that process Personal Data on our behalf under our instructions.
- “Data Protection Laws” means applicable privacy and data protection laws, including GDPR and CCPA where relevant.

We do not collect or process Special Category Data.

### 4. Information We Collect

We collect minimal information and avoid collecting personally identifiable data unless you voluntarily provide it.

#### 4.1 Device and Technical Information

We may collect limited, anonymized technical information such as:

- browser type,
- device type,
- operating system,
- general error or performance metrics.

This information is used solely for operational stability, security, and diagnostics.

## 4.2 General Location Information

We may infer broad location information (such as country, region, or time zone) from IP addresses. IP addresses are anonymized and not stored in identifiable form. We do not collect precise location or GPS data.

## 4.3 Wallet Connections and Blockchain Activity

When you connect a wallet to interact with the Services:

- All blockchain transactions occur on public blockchains and are publicly visible.
- We do not store private keys, seed phrases, or wallet credentials.
- We do not link multiple wallets to a single identity.
- We do not associate on-chain activity with off-chain identity unless you voluntarily provide identifying information.

Never share your private keys or seed phrase. If anyone requests them, treat it as malicious activity.

## 4.4 Information You Voluntarily Provide

You may voluntarily provide information when:

- contacting support,
- reporting incidents or protocol issues,
- participating in governance or operational processes,
- communicating with us via email or other channels.

This may include:

- your email address,
- technical details (e.g., transaction hashes),
- descriptions of incidents or issues.

You are responsible for the accuracy of information you provide.

## 4.5 Public Blockchain Data

Blockchain data such as wallet addresses and transaction hashes is public by nature. When such data is submitted to us or processed in connection with the Services, it may be treated as Personal Data under certain laws when combined with other identifying information.

## 5. How We Use Information

We process information only for legitimate and limited purposes, including:

- operating and maintaining the Services;
- responding to user requests and support inquiries;
- investigating incidents or protocol issues;
- ensuring security, integrity, and abuse prevention;
- complying with legal and regulatory obligations;
- improving performance and reliability through anonymized analytics.

We do not use data for advertising, profiling, or behavioral tracking.

## 6. Analytics

We do not use cookies, persistent identifiers, or tracking technologies.

We use PostHog and Google Analytics in:

- cookie-less,
- anonymized,
- session-based modes only.

Analytics data:

- is processed in memory,
- is anonymized before processing,
- is discarded after the session ends,
- does not include persistent identifiers.

## 7. Sharing of Information

We share information only when necessary and only as described below.

### 7.1 Service Providers

We may share limited information with trusted third-party providers for:

- infrastructure hosting,
- security monitoring,
- fraud prevention,
- analytics processing.

Such providers act as Processors and are contractually bound to process data only on our instructions.

### 7.2 Incident-Related Disclosures

Information related to reported incidents may be shared with:

- auditors,
  - reviewers,
  - governance bodies,
  - evaluators,
- where necessary for fair assessment, audit, transparency, or compliance.

Non-identifiable incident data may be made public where required.

### 7.3 Legal Obligations

We may disclose information when required by law, regulation, court order, or governmental authority.

## 8. Data Retention

We retain information only for as long as necessary:

- anonymized data may be retained for analytics or security purposes;
- identifiable data (e.g., email addresses) is retained only as long as needed to respond to requests or comply with legal obligations;

- incident-related data may be retained for audit, compliance, or dispute resolution.

## 9. Security Measures

We implement industry-standard technical and organizational safeguards, including:

- encryption in transit,
- access controls,
- monitoring and logging.

However, no system is entirely secure. By using the Services, you acknowledge residual security risks.

## 10. International Data Transfers

Due to the global nature of blockchain and our operations, data may be processed outside your jurisdiction. Where required, we apply appropriate safeguards such as Standard Contractual Clauses or equivalent mechanisms.

## 11. Your Rights

Depending on your jurisdiction, you may have rights to:

- access your Personal Data,
- correct or delete data,
- restrict or object to processing,
- data portability,
- withdraw consent.

Requests can be submitted using the contact details below. Identity verification may be required.

## 12. EU (GDPR) and California (CCPA) Disclosures

We respect applicable rights under GDPR and CCPA.

We do not sell personal data.

We do not engage in cross-context behavioral advertising.

## 13. Social Media and Third-Party Platforms

We may maintain a presence on third-party platforms. Their privacy practices are governed by their own policies. We do not control or assume responsibility for third-party data practices.

## 14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Updates take effect when published on the Site. Continued use of the Services constitutes acceptance of the updated Policy.

## 15. Contact Us

For privacy-related inquiries or to exercise your rights, contact us at:

Email: [hq@asterizm.io](mailto:hq@asterizm.io)

Subject: Data Protection Inquiry