



## Privacy Policy

Dispatch Labs LLC (Dispatch) is committed to the value of privacy. This Privacy Policy (Policy) explains how we collect, use and share information associated with you (Personal Information). Our address is 930 Alabama St., San Francisco, CA 94110.

### 1. HOW WE COLLECT AND USE PERSONAL INFORMATION

Dispatch' core business is the operation of the Dispatch shared ledger and the associated Dispatch Artifact Network (DAN). Generally, our collection and processing of Personal Information is based upon our legitimate interests in operating this business, in cooperation with our customers, users, partners, developers and general community. In some cases where indicated below, we rely upon your explicit consent to collect and process Personal Information, in which case you may withdraw such consent at any time by contacting us as explained in section 4 below.

- A. Dispatch Ledger and DAN.** The Dispatch ledger and DAN are designed to hold all types of data (including Personal Information, as well as software-based “smart contracts”). Transactional information on the Dispatch ledger (i.e. information other than the data stored) may also include Personal Information of the transacting parties. However, Dispatch does not affirmatively collect or process Personal Information (or other information) on the Dispatch ledger or DAN – it is entirely up to our customers and other users what data is stored and processed. Dispatch has access to data stored on the Dispatch ledger only to the same extent as the general public (data on the Dispatch ledger is generally public, although users may choose to store encrypted data), and we have no access to data stored on DAN (which is encrypted with user private keys).
- B. Nodes.** Several types of entities involved in operation of the Dispatch ledger and DAN are “nodes” (including stakeholders, elected delegates, elected learners, uploaders, downloaders and farmers – please see our [White Paper](#) for further information on these roles). Some information regarding nodes is likely to be Personal Information.
- **General Information.** We collect certain general information regarding nodes: IP address and which DAN files the node is farming (or saving in its storage). Details of nodes and the locations of data on DAN are stored in the Kademlia distributed hash table (Kademlia DHT) held by each node.
  - **Performance and Voting.** In order to assess node performance, Dispatch collects information on node performance measurements (CPU speed, memory, bandwidth and internet speed) and user feedback on node performance. We provide this information to stakeholders (together with the node IP address) to inform their voting for delegates as part of our Delegated Asynchronous Proof of Stake protocol (see our White Paper for further information). We also use this information internally to identify nodes that are not behaving according to our protocols.
  - **Farming.** Operation of DAN involves “farmers” who deliver data to and from DAN on behalf of users. Farmers do not have access to the data being stored or retrieved, but they may have some information regarding those on whose behalf they conduct farming. Farmers will primarily be third parties not affiliated with Dispatch, but Dispatch will offer farming services upon launch of the Dispatch ledger and network.

### **C. General Operations.**

- Dispatch collects Personal Information regarding its customers, users, partners, developers and general community. Information collected may include name, email and physical address, phone number, company name and job title, type of relationship (customer, partner, developer, etc.), payment information and other information applicable to specific relationships. We use this information to manage our activities and operational relationships involving these parties – including for communications regarding our services; billing and other financial functions; IT support; improving our services; and analyzing the demographics of our community.
- We also collect any Personal Information that you provide to us when you contact us by email, chat, social media, telephone or otherwise. By providing your Personal Information, you provide consent for us to process the information for the purposes indicated in the communication.

### **D. Marketing, Cookies and Analytics.**

- We collect contact information from those in our community, including name, email and physical address, phone number, company name and job title. With your consent, we may use this information for marketing purposes, including to provide information on Dispatch services.
- The Dispatch website uses session and persistent cookies (small data files stored in your browser) to store data regarding your use of our services, including username, IP address, browser type and version, device type, and operating system and platform. If you configure your browser to reject cookies, this may interfere with your use of our services. We recommend closing browsers and clearing cookies, caches, and browser history on publicly available machines after use.
- Our emails may contain a “web beacon pixel” to tell us whether they have been delivered, opened, shared or unsubscribed from and to verify any clicks on links within the email. The pixel may also allow us to collect technical information including your geographic location, browser type and version, device type, and operating system and platform. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you can read the email in plain text view or with images disabled.
- We use Google Analytics, which collects information such as geographical location, webpage views and visits to other websites, including using cookies. We use this information to improve our services and analyze the demographics of our community. To opt out of being tracked by Google Analytics, you can install the relevant browser add-on available at <https://tools.google.com/dlpage/gaoptout>.

**E. Investment.** Dispatch plans to conduct a sale of tokens to fund its operations and for other purposes. We expect to collect various Personal Information from investors, including for “know your customer” and anti-money-laundering compliance purposes. All such information will be collected with investor consent at the time of investment. We will use the information in order to sell tokens, and to manage ongoing relationships with investors.

**F. Children's Personal Information.** The Dispatch service is for general commercial use. Dispatch does not knowingly collect any Personal Information from children under age 16.

## 2. SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES

Except as described in this section 2, Dispatch does not share your Personal Information without your consent. We never sell Personal Information.

**A. Dispatch Ledger, DAN and Nodes.** Personal Information is shared among the participants in the operation of the Dispatch ledger, DAN and nodes as described in sections 1.A and 1.B above. As explained in those sections, collection and processing of data on the Dispatch ledger and DAN is done only to the extent chosen by customers and users.

**B. Operations / Subcontractors.** Dispatch may disclose Personal Information to third parties who support our services, including providers of communications, IT and software services; finance and accounting services; and certain other services. This sharing is subject to agreements with the third parties to ensure the information is used only for such service support, in accordance with this Policy and applicable law. Data stored on the Dispatch ledger and DAN (other than public data) is not accessible by such service providers.

**C. Aggregated Data.** Dispatch may process and disclose aggregated information (based on Personal Information the we hold) that is anonymized in a way that prevents it from being used to identify any individual customer, user or specific transaction, including to provide general information on use of our services to our community and the public.

**D. Disclosure Under Law or To Protect Services.** Dispatch may disclose Personal Information if required under applicable laws (including for law enforcement and national security purposes), to report a violation or suspected violation of applicable laws to appropriate governmental authorities, or where we believe that disclosure is necessary to enforce our legal rights (e.g. where there is a breach of an agreement with us) or to protect the integrity of our services. However, we cannot disclose information stored on DAN or encrypted information on the Dispatch ledger, because we do not have access to it.

**E. Sale or Merger.** In the event of sale or merger of Dispatch, Personal Information may be available to the acquiring party, subject to the limitations of this Policy.

## 3. RETENTION OF INFORMATION

- Dispatch applies the following policies on retention of Personal Information:
- Information on the Dispatch ledger is available indefinitely, because that is the nature (and a key benefit) of distributed ledger technology. However, we provide tools and functions to limit availability of Personal Information on the Dispatch ledger. For more information, see [link].
- Information on DAN is also stored indefinitely. However, a user can permanently disable access to such information by deleting the private key used to store the data. Furthermore, pointers to DAN data in the Kademlia DHT can be deleted by the user storing the data.
- Personal Information on our nodes, customers, partners, developers and investors is stored indefinitely by default, to maintain a record of our commercial interactions with them. However, you may request deletion of your Personal Information, as explained under “Your Rights” below.

## 4. YOUR RIGHTS

You may request access to, correction or deletion of your Personal Information held by Dispatch, or request that we limit the ways in which we process your information; however, Dispatch may choose not to delete Personal Information where it is necessary to the integrity of our services. EU customers and users have certain rights to restriction of data processing and data portability to other service providers. Users may exercise any of these rights by writing to [privacy@dispatchlabs.io](mailto:privacy@dispatchlabs.io).

You are free to withdraw your consent to receive marketing communications at any time by clicking the “unsubscribe” link found at the bottom of our emails or contacting us at [privacy@dispatchlabs.io](mailto:privacy@dispatchlabs.io). You may not refuse to receive certain service- and security-related communications if you continue to use our services.

## 5. SECURITY

Dispatch uses extensive and robust technological and organizational measures to protect Personal Information and other data from unauthorized disclosure, alteration or destruction. We have implemented encryption protocols to protect information stored on DAN, and all connections to our websites are encrypted by default whenever possible. Please see our [White Paper](#) for further information on our security practices.

Dispatch relies on users to select secure passwords, to protect their secret keys and passwords, and to use appropriate security software on their devices. Please contact Dispatch with any information regarding unauthorized use or security risks to our services.

## 6. CONTROLLER AND PROCESSOR

Dispatch is the data controller of Personal Information that we collect and process under sections 1.B through 1.E above. Customers and users who store information on the Dispatch ledger and the DAN are data controllers of that data (since they determine the purpose and means of such processing), and we are a data processor on their behalf. Dispatch nodes are processors (or sub-processors) working on behalf of us or Dispatch users.

Where Dispatch acts as a data processor, we make the following commitments, and if you are a processor covered by this Policy, you make the following commitments by accepting this Policy:

- to process Personal Information only as instructed by the data controller;
- to ensure that persons processing Personal Information are under appropriate obligations of confidentiality;
- to take appropriate technical and organizational measures to ensure the security of processing and storage of Personal Information;
- to engage sub-processors of Personal Information only in accordance with this Policy (which must be made applicable to such sub-processors);
- to use reasonable endeavors to delete Personal Information and/or render it inaccessible when requested by the data controller; and
- to assist the data controller in fulfilling obligations under applicable privacy law, including (i) assisting the controller to respond to requests from individuals regarding their Personal Information, (ii) providing information and cooperating with audits regarding processing and storage of Personal Information where reasonably requested by the controller.

## **7. THIRD PARTY SITES AND SERVICES**

The Dispatch ledger, the DAN and our websites can contain links to other sites and services, and most Dispatch nodes and DAN storage instances are not operated by Dispatch. Dispatch is not responsible for the privacy practices (or other practices, services or content) of other parties or services (including Dapps and other applications built on the Dispatch ledger and the DAN), although we take substantial steps to ensure that the Dispatch ledger and DAN are operated in accordance with our specifications. We encourage you to read the privacy policies of each entity that collects your Personal Information.

## **8. GLOBAL TRANSFER OF INFORMATION**

Dispatch and its computing facilities are based in the United States. The Dispatch ledger and the DAN are a decentralized network, and nodes may be located anywhere in the world. By consenting to this Policy and providing information to Dispatch or for storage on the Dispatch ledger or the DAN, you are agreeing to the transfer of that information to that global network in accordance with this Policy, including to countries that may not have privacy laws or practices equivalent to those in your home country.

In certain cases, we may agree EU Standard Contractual Clauses ([https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)) with parties in the EU that transfer Personal Information to us.

## **9. UPDATES TO THIS POLICY**

From time to time, Dispatch may update this Policy to reflect changes in the law, changes in our services, or for other reasons. Updated versions of this Policy will be posted on our website. If we make material changes to the Policy, we will send a copy of the updated Policy to customers and users who have provided us with their contact information.

## **10. CONTACT INFORMATION AND COMPLAINTS**

If you have inquiries or complaints about this Policy or your Personal Information, you should first contact us at [privacy@dispatchlabs.io](mailto:privacy@dispatchlabs.io) or via [our website](#). If we receive a complaint, we will contact the person who made the complaint to follow up.

Dispatch works with the appropriate regulatory authorities to resolve any complaints regarding Personal Information that we cannot resolve with our customers and users directly. If we are unable to resolve a privacy concern that you raise, you may also have the right to complain to the data protection authorities in your country.