

# Privacy Policy

This is the Privacy Policy of SPCores Ltd. (hereinafter referred to as "SPCores," "we," "us," or "our"). Our Privacy Policy outlines how we collect, use, share, and safeguard personal information. It also highlights your associated choices regarding the use, access, and correction of your personal data. We process personal data in compliance with the General Data Protection Regulation (GDPR) and in accordance with the data protection laws applicable in Singapore. We may periodically update this policy, and the latest version will be made available on our website.

## Data Processing Responsibility

SPCores Ltd. is accountable for the processing of your personal data in relation to the utilization of our website, acquisition of services, and/or products, as outlined in this Privacy Policy.

## Contact Information:

SPCores Ltd.

10 Anson Road,

#13-09 International Plaza,

079903 - Singapore

Registered under the Unique Entity Number (UEN): 202308446E

For any inquiries concerning the collection, processing, or use of your personal data, or to exercise your rights regarding your personal information, please reach out to our Data Protection Officer at

[support@spcores.com](mailto:support@spcores.com).

## Types of Information Collected

### 1. General Users:

When you engage or register on the SPCores platform, we collect:

Cryptocurrency wallet address, which serves as your primary identifier within our system.

### 2. Affiliates:

For those registering as an Affiliate with SPCores (an individual or business entity entering an Affiliate Agreement with us for promotion and sale of SPCores services/products/opportunities), additional data collection includes:

- First and last name.
- Country of residence.
- Date of Birth.
- Business name (if applicable).
- Business address (if applicable).
- Telephone number.
- Company registration number (for business entities).
- Personal identity card number, tax identity number, or social security number (if applicable).
- Digital copies of personal identification, which could include passport, driver's license, or personal identity card, coupled with a personal image.

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### **Legal Protections and Responsibilities:**

In alignment with the PDPA and associated Singaporean regulations, all garnered personal data undergoes stringent safeguarding. SPCores employs advanced security measures to guard against potential loss, misuse, and alteration of your data.

Affiliates hold the responsibility to ensure the accuracy of the data they provide. Prompt updates to personal data are necessary upon encountering changes or discrepancies.

Under particular legal circumstances, such as adhering to regulatory obligations or lawful public authority requests, SPCores might have to disclose certain personal data.

Both Affiliates and general users can access, correct, or erase their stored personal data with SPCores. Such requests should be channeled to our Data Protection Officer.

**Note on KYC Procedure:** Engaging in our Affiliate system mandates a Know Your Customer (KYC) process. This ensures transparent operations and compliance with anti-money laundering (AML) standards. All information acquired during this phase is stored securely with restricted access.

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## Usage of Personal Data

Your personal data, once gathered, is leveraged strictly for the ensuing purposes:

### 1. Fulfillment of Our Contractual Commitment:

- Maintaining fluent communication, whether via email, phone, or other available channels.
- Delivering the services and products as per your request.
- Ascertaining and tracking your due compensation.
- Managing compensation payments.
- Generating bills, receipts, and other fiscal documentation.
- Monitoring credit.
- Establishing and upholding your account.
- Processing and completing orders.

### 2. Payment Facilitation:

Upon placing an order on our platform, the payment for chosen services or products must be finalized. For this, you might have to share financial particulars, such as credit card digits, expiry date, and security code. However, SPCores does not process or retain this data. It is relayed directly, and securely (encrypted), from you to a third-party payment processing entity. Your transaction is handled by Stripe or other payment gateways we collaborate with, as per their respective privacy policies.

### 3. Cryptocurrency Wallet Data:

For Affiliates, provision of the unencrypted public key of your wallet might be necessary to request cryptocurrency-based payments. It is imperative to understand that we NEVER solicit or store your unencrypted private key.

### Legal Compliance and Assurances:

The exclusive aim of this data utilization is to uphold our commitment to you and to ensure transparency in all transactions. SPCores remains committed to safeguarding all personal data and employs rigorous security mechanisms to ensure its protection.

Any user or Affiliate can forward inquiries, access requests, or corrections related to their stored personal data to SPCores's Data Protection Officer.

## Account Registration and Maintenance with Crypto wallet

For seamless usage of our products or services, a connection to your cryptocurrency wallet is imperative. This serves as your unique identifier, eliminating the need for traditional login credentials such as usernames, passwords, or email addresses. By linking your cryptocurrency wallet, you authorize its use for both registration and login purposes on our platform.

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## Identity and Address Validation for Affiliates (KYC Procedures)

Upon expressing interest to become an Affiliate, you might undergo a rigorous “Know Your Customer” (KYC) verification, which necessitates the validation of your identity and residence. This involves the perusal of documents like your passport, driver's license, or national identity card. Through a combination of our proprietary Shlen Power system and manual assessments, identity verification is facilitated. At Shlen Power, we emphasize that unnecessary retention or unwarranted processing of your identity verification data is strictly avoided. Furthermore, we reserve the right to decline the activation of an Affiliate account based on unsatisfactory verification outcomes and to perform regular identity audits. All operations strictly adhere to our privacy standards. Additionally, Shlen Power reserves the prerogative to utilize and disseminate these data with legal entities, third-party agencies, and government bodies.

## Affiliate Web Panel

Once onboarded as an Affiliate, the Shlen Power web panel becomes accessible to you. It offers an in-depth overview of your availed services and products. Displayed information includes, but isn't limited to, personal details like name, address, email, and pertinent cryptocurrency wallet addresses, transactions, and order specifications.

Within the web panel, the team overview offers insights into Affiliates under your purview. Information such as their wallet identifier, residency details, Affiliate metrics, and more becomes available. This data serves a singular purpose - to compute and trace your commission rights.

Potential provision of marketing tools, aimed at an enhanced comprehension of your leads, is also on the cards. It is crucial to note that the data processed via these tools, on behalf of an Affiliate, is not encompassed by this policy. Instead, a distinct Data Processing Agreement guides its handling.

## Direct Marketing and Communication Initiatives

Upon receiving your express consent, SPCores may utilize your personal details to communicate with you through various marketing instruments and provide informative content. This encompasses newsletters, promotional content, and other pertinent information that might be of interest to you. Our primary communication channels include email, postal mail, and recognized messaging platforms such as Messenger or WhatsApp.

Emphasizing our commitment to your choice, such outreach endeavors are initiated only with your explicit agreement. Should you wish to withdraw from our marketing communications:

1. **Email:** For emails, you can swiftly unsubscribe by clicking on the designated "unsubscribe" link usually placed at the bottom of our promotional emails.
2. **Social Channels:** For platforms like Messenger or WhatsApp, they offer specific processes to manage subscriptions. To understand more and deactivate personalized ads and offers on these platforms, consult the respective platform's official website or support resources.
3. **Direct Contact:** For comprehensive assistance or to cease all communications containing promotional material, please contact our support team directly.

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## Preserving Your Privacy

We prioritize the integrity and privacy of your data. We respect and act according to your communication preferences, ensuring a seamless adjustment to any changes you might desire.

### Google Analytics

Like most websites, this we use Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website. Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a thirdparty data processor (see section about "International Transfer" below). Google may also transfer this information to third parties where required to do so by law or where such third parties process this data on Google's behalf. Google states that it will never associate your IP address with other data held by Google.

GA makes use of cookies, details of which can be found on Google's developer guides and on our Cookies Policy. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website.

### Google Tag Manager

Google Tag Manager (GTM") is a tag management system to manage JavaScript and HTML tags operated by Google LLC. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). GTM is a little snippet of code that helps us track user behavior across our sites and then pushes the data to our Google Analytics account. The GTM tool itself (which implements the tags) is a cookie-less domain and does not register personal data but makes it easier for us to integrate and manage our tags. The tool causes other tags to be activated which may, for their part, register data under certain circumstances. Google Tag Manager does not access this information. If recording has been deactivated on domain or cookie level, this setting will remain in place for all tracking tags implemented with Google Tag Manager. We consider Google to be a third-party data processor (see section about "International Transfer"

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below). If you have performed deactivation, GTM takes this deactivation into account. For more information about GTM's privacy practices can be found at <https://policies.google.com/privacy?hl=en> and terms of use at <https://www.google.com/analytics/tag-manager/use-policy/>

### Google Fonts Google Fonts

is an interactive directory with over 800 fonts, which Google provides free of charge. On our website we use Google fonts from Google Inc. The company Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for the European area. To prevent any information transfer to Google servers, we have integrated the Google fonts locally, i.e. on our web server – not on the servers of Google. This means that there is no connection to Google servers and therefore no data transfer or storage. In this way, we act in accordance with data protection laws and do not send any data to Google Fonts. Google gives us unlimited access to all fonts. This means we have unlimited access to a sea of fonts and can thus get the best out of our website. More about Google Fonts and other questions can be found at <https://developers.google.com/fonts/faq?tid=311177224>

### Cloudflare CDN

We use the “Cloudflare CDN” service provided by Cloudflare Inc., 101 Townsend St., San Francisco, CA 94107, USA. (hereinafter referred to as “Cloudflare”) that acts as the Content Delivery Network (CDN) on our website. A CDN helps to deliver content from our online offering, especially files such as graphics or scripts, faster with the help of regionally or internationally distributed servers. This enables Cloudflare to analyze data transactions between your browser and our website and to work as a filter between our servers and potentially malicious data traffic from the Internet. When you access our content, you connect to Cloudflare, Inc. servers, transmitting your IP address and, if applicable, browser data such as your user agent. This data will be processed exclusively for the above purposes and for the maintenance of the security and functionality of Cloudflare. In this context, Cloudflare may also use cookies or other technologies deployed to recognize Internet users, which shall, however, only be used for the herein described purpose

The use of Cloudflare is based on our legitimate interest in a provision of our website offerings that is as error free and secure as possible (Art. 6 Sect. 1 lit. f GDPR).

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: [www.cloudflare.com/media/pdf/cloudflare-customerdpa.pdf](http://www.cloudflare.com/media/pdf/cloudflare-customerdpa.pdf). For more information on Cloudflare's security precautions and data privacy policies, please follow this link: [www.cloudflare.com/privacypolicy/](http://www.cloudflare.com/privacypolicy/).

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## Log file information

We collect and store information through the use of “cookies” and other automated means whenever you visit our website. This information may include information such as your computer's Internet Protocol address, browser type, browser version, your login attempts, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics. This enables us to improve our website and deliver a better service to you. We collect your IP address to track technical issues and errors so we can improve our website. We use your IP address and log activities to be able to avoid or eliminate fraudulent use of your account. This way we can see if there is an irregular amount of login attempts on your account to allow us to detect fraud. In such an instance we may request you to verify your identity using your Account Information. We store your IP address and your activities on our website for this purpose in our logs. You may always contact us if you wish to delete this information and/or personal data from our files. Find out more about the cookies we use in our “Cookie Policy”.

## Our Presence on Social Media SPCores

actively engages on various social media platforms, including but not limited to Facebook, Twitter, LinkedIn, YouTube, and Instagram. Through these channels, we may:

- Showcase our events and campaigns.
- Celebrate our community's milestones and achievements.
- Host contests, giveaways, and other promotional activities.

### Interactions and Data Processing on Social Media

1. **Direct Communications:** If you reach out to us or engage with our content on social media, we may process relevant data such as your social media handles to respond to inquiries, acknowledge achievements, or facilitate participation in our promotions.
2. **Participation in Contests or Promotions:** For those partaking in our contests or promotional events on social media, we might request personal data like your name, address, or email for prize distribution and related communications. This data is processed with your explicit consent and specific terms for each event will be provided as needed.
3. **Acknowledgements & Celebrations:** To celebrate special occasions, recognize accomplishments, or extend birthday wishes, we might ask for your name, photograph, date of birth, and rank. This information, when shared on our social media platforms, is done so only with your explicit consent.
4. **Additional Purposes:** While this policy aims to cover most common interactions on social media, there might be instances where your data could be processed for reasons beyond those listed here. In such cases, we will provide clear information regarding the purpose during the event registration or as part of the specific activity terms.

**Visitor Statistics and Third-party Platforms** We routinely receive analytical data from our social media campaigns, providing insights into visitor engagement and preferences. While SPCores and the respective social media platforms jointly manage this data, for individual data rights and concerns, the social media platform often serves as the primary point of contact. We may assist the platform, where required, in ensuring they address your queries or grievances.

For a comprehensive understanding of how these third-party platforms handle personal data, and to adjust your privacy settings accordingly, kindly consult the respective platform's official website and privacy policies.

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## Data Sharing Practices

1. **Collaborative Sharing:** For the effective execution of the agreement established with our users, we might share certain data with our parent company and third-party service providers. These entities are strictly bound by either this Privacy Policy or relevant confidentiality, oath, or legal obligations. Your personal data may be shared with:
  - Your sponsor and downline, facilitating network-related activities.
  - Professional advisors, including but not limited to banks, insurance companies, auditors, legal counsel, accountants, and other specialized advisors.
  - Platforms and providers related to payments, identity verification, compensation tracking, and self-billing.
  - Customer care units, inclusive of chat and messaging service providers.
  - Providers for email, hosting, software, telecommunication, Google Analytics, and social media.
  - Regulatory or governmental bodies, when necessary.

2. **Change of Control:**

In scenarios where SPCores undergoes significant structural changes, such as a merger, acquisition, bankruptcy, dissolution, or asset sale, your personal information might be among the transferred or sold assets. The acquiring entity will be obligated to adhere to the assurances made in this Privacy Policy.

3. **Legal Requests & Prevention of Harm:**

- **Legal Compliance:** We might disclose your information when confronted with legal demands (e.g., search warrants, subpoenas, court orders) if we believe in good faith that such disclosure is mandated by law.
- **Safety Measures:** We retain the right to access, conserve, and distribute your data when we genuinely believe it aids in identifying, preventing, or addressing fraudulent activities, ensuring the safety of the public, facilitating investigations, or averting imminent threats. Such data may be kept, accessed, or processed for extended durations, especially if it becomes a part of legal directives, government scrutiny, or probes concerning potential breaches of our terms, policies, or to thwart potential harm.



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## Safety and security

Shlen Power has taken appropriate technical and organizational measures to ensure that the regulations and requirements relating to data protection are observed and upheld both by ourselves and by our external service providers. We use the latest technologies to protect your information against loss or unlawful processing. We use safeguards to help keep the information collected through the Service secure; requesting a unique password to verify your identity before granting you access to your account, tracking of user log-in attempts, encryption of sending personal data via our website (SSL) and regularly updating our systems are examples of these measures. If you think that your data is not properly secured or if you have indications that your data is being misused, please send us an email. However, Shlen Power cannot ensure the security of any information you transmit to Shlen Power or guarantee that information on the website may not be accessed, disclosed, altered, or destroyed. We request you to do your part to help us. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and Shlen Power, at all times. We are not responsible for the functionality, privacy, or security measures of any other organization.

## International transfer

In principle, your personal data will not be transferred to and maintained on computers located outside the European Economic Area ("EEA"). However, in the case of some of the non-European service providers that we engage, data processing outside the EEA cannot be excluded, for example:

Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States (Analytics); Privacy Office Onfido Limited, 3 Finsbury Avenue, London, EC2M 2PA, United Kingdom.

In order to comply with EU legislation, we carefully consider whether an adequate level of protection can be provided. These service providers are only permitted to use the information insofar as reasonably necessary for the performance of the agreement you have concluded with us. Where necessary, we conclude data transfer agreements with these service providers based on standard contractual clauses established by the European Commission. These service providers may be obliged to provide access to your data based on their applicable laws and regulations. For more information about safeguards for international transfers, please contact us using the contact details provided in this Privacy Policy.

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## Retention period

In accordance with the law, Shlen Power does not retain your personal data any longer than is reasonably necessary for attaining the purposes for which they were collected outlined in this Privacy Policy, or for the duration required by any legal, regulatory, accounting or reporting requirements, whichever is the longer. We will retain your personal data as follows

Type of personal data	Retention period
Customer data (First name, last name, address, email address, telephone number)	Up to 5 years after the last transaction due to the statutory limitation period for claims for damages. This information may serve as evidence.
Affiliate data (Company name, name of contact person, business address, business email address, business telephone number)	Up to 5 years after deactivation of the Affiliate account or termination of the Affiliate agreement, whichever is later, due to the statutory limitation period for claims for damages. This information may serve as evidence.
Account information Customer (username, email address, password)	As long as your account is active. It will take 30 days for the account to be completely removed from all our systems.
Account information Affiliate (username, email address, password)	5 years after termination of the Affiliate agreement. Thereafter the account will be anonymised, which will no longer be considered personal information.
Affiliate financial records such as a cryptocurrency wallet address and other payment details you choose to provide	7 years due to our legal administration obligation. If and to the extent that your public key and other wallet information represents personal data, any personal information stored on the blockchain as part of a transaction will remain there indefinitely due to the nature of blockchain technology
Correspondence	Up to 5 years after the last transaction due to the statutory limitation period for claims for damages. This information may serve as evidence
Marketing communications (email address, WhatsApp number, messenger ID, postal information)	Until you unsubscribe. If you decide that you no longer wish to receive the marketing communications, we will keep the withdrawal of your request. You may unsubscribe from our advertisements, offers at any time.
Personal data obtained through social media	If used in connection with each promotional activity, the data will not be provided to third parties and will be destroyed once the promotional activity is no longer valid. If used in connection with congratulatory purposes and publishing on social media account(s), as long as you ask us to remove the posts, which you can do so at any time.

Upon expiry of the applicable retention period, we will securely destroy your personal data in accordance with applicable laws and regulations. In some circumstances we may anonymize your personal data so that it can no longer be associated with you, in which case it is no longer personal data. Privacy Policy If you would like details of the retention periods for a particular aspect of your personal information which is not detailed above, please contact us at [privacy@spcores.com](mailto:privacy@spcores.com).

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## Inspection and correction

You have the statutory right to know what personal data of yours we have stored and to whom we have disclosed it. You are entitled to request information at no cost about your data at any time and without charge, and to demand its correction, deletion or blocking. You may also revoke your consent to the processing methods at any time with immediate effect for the future.

You can easily access most of your data (including the data provided by you) and rectify/correct such data through your registered account. If you have created an account on our website as a customer, you can delete your account by sending us an email to remove your account.

If you have created an account on our website as an Affiliate, you can send us an email to deactivate your account. Your position within your team will remain visible, but we will anonymise your personal information, in which case it is no longer considered personal information.

If you wish, we can send your personal data to you so that you can transfer it to another party. You can make a request to that effect by sending an email to us. Most likely, in such case we will no longer be able to continue our service as we can no longer guarantee the safeguard of your personal data.

In addition, you can ask us to restrict the processing of your personal data (for example if you deem the information to be incorrect, the processing is unnecessary or the processing is unlawful) or the termination of use of your personal information. Also, you have the right to not be subject to a decision based solely on automated processing.

Remember, you can always object to the processing of your personal data.

If you would like further information about how your personal information is stored, or you wish to exercise one of your aforementioned rights, please send us an email. You may be contacted by our customer support team in order to verify your identity before we fulfil your request. This is to protect your privacy.

## Third-party applications, websites, and services

We are not responsible for the practices employed by any applications, websites or services linked to or from our website, including the information or content contained within them. Please remember that when you use a link to go from our Service to another application, website or service, our Privacy Policy does not apply to those third-party applications, websites, or services. Your browsing activity and interaction on any third-party application, website, or service, including those that have a link on our website, are subject to that third party's own rules and policies.

## Children's privacy

We do not intend to address to children (under 13 in the US, under 16 for EU residents, or other age as required by local law) ("Children"). We do not knowingly collect personally identifiable information from Children. If you are a parent or guardian and you are aware that your Children has provided us with personal information, please contact us. If we become aware that we have collected personal

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information from a child under the age of 16 (or the applicable age in their territory) without verification of parental consent, we take steps to remove that information from our servers.

### **Changes to this privacy policy**

We may modify or update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### **How to contact us**

If you have any questions about this Privacy Policy of the Service, please send an email to our Data Protection Officer at [privacy@spcores.com](mailto:privacy@spcores.com)