

## Sablier Labs Ltd Privacy & Cookie Policy

(Last updated 21.12.2023)

1. INTRODUCTION	
Who are we?	We are Sablier Labs Ltd a company incorporated and registered in England with company number 14144591 and registered office The London Office, 85 Great Portland Street, London, England, W1W 7LT. Where we decide the means or purpose of processing your personal data, we are the data "controller."
What's this policy about?	<p>This policy explains how we process your personal data as a data controller when you:</p> <ul style="list-style-type: none"> <li>● are a "User" of our website (<a href="https://sablier.com">https://sablier.com</a>) any of its respective subdomains, and any other website or app of ours that links to this privacy policy (together, the "Services"); and</li> <li>● invest in our business as a "Shareholder".</li> </ul> <p>We update this policy from time to time so please check back in.</p>
Contact us <i>(if you have questions about this policy or to exercise your rights)</i>	<p>Write to us at: <a href="mailto:legal@sablier.com">legal@sablier.com</a> with any questions about our personal data processing.</p> <p>If you are in the UK and we cannot resolve your issue, you can also get in touch with the Information Commissioner's Office: <a href="https://ico.org.uk/concerns">https://ico.org.uk/concerns</a>. If you live in a European country outside the UK, you can alternatively submit a complaint to the supervisory authority in your country.</p>
What are your rights?	<p>You have the following rights in respect of personal data, although these rights may be limited in some circumstances:</p> <ul style="list-style-type: none"> <li>● Ask us to send a copy of your data to you or someone else</li> <li>● Ask us to restrict, stop processing, or delete your data</li> <li>● Object to our processing of your data</li> <li>● Object to use of your personal data for direct marketing</li> <li>● Ask us to correct inaccuracies</li> </ul> <p>If we rely on consent to process data, or send direct marketing, you can withdraw consent by email to the address above.</p>
Is there anything else to note?	<p>Please note that when you use the Services, you are interacting with the Ethereum and other EVM blockchains, which provide transparency into your transactions. Sablier does not control and is not responsible for any information you make public on the Ethereum or other blockchains by taking actions through the Services.</p> <p>The Services may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and are not responsible for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link towards a third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly if you have any questions.</p>

2. YOUR PERSONAL DATA AND HOW WE USE IT		
Your data	How we use it	Sources and recipients

<p><u>Enquiry data</u> (<i>information we receive when you get in touch</i>) including:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Other personal data you send to us as part of enquiries.</li> </ul> <p><u>How long we keep it</u></p> <p>7 years from when our relationship with you ends.</p>	<p>We process this information to respond to your support and other enquiries.</p> <p><u>Legal basis</u></p> <p>We may process this data in accordance with the terms of our contract with you (where we need this information to provide Services to you) or to take steps you request prior to entering into a contract.</p> <p>We also use this to pursue our legitimate interests, including: (a) our interest in responding to enquiries to ensure smooth operation of our business and services; and (b) to understand our customers and improve our Services, by taking onboard your feedback.</p> <p><u>More information</u></p> <p>You may be required to provide us with certain information for us to respond to your enquiries.</p>	<p><u>Sources</u></p> <ul style="list-style-type: none"> <li>• We collect this information from you when you send it to us.</li> </ul> <p><u>Recipients</u></p> <p>We use Crisp Chat as a customer relationship management tool. Find out more about Crisp at <a href="https://crisp.chat/en/privacy/">crisp.chat/en/privacy/</a></p>
<p><u>Stream Information</u></p> <p>We use the following data to display details of active and historic streams on our website:</p> <ul style="list-style-type: none"> <li>• Wallet addresses (of sender and recipient)</li> <li>• Status of streams (e.g. tokens sent, and the status of the stream).</li> </ul> <p><u>How long we keep it</u></p> <p>We do not store this data which is simply fetched and displayed through our website as and when requested</p>	<p>Our website may allow visitors to view the status of streams, in which case the website will display publicly information about streams available on the relevant blockchain.</p> <p><u>Legal basis</u></p> <p>We process this data to pursue our legitimate interest in providing visitors to our website the ability to view the status of streams more easily through a graphical user interface, rather than querying the blockchain directly.</p>	<p><u>Sources &amp; Recipients</u></p> <p>We collect this from the public blockchain, using an API provided by ConsenSys Software Inc. (<a href="https://consensys.net/privacy-policy/">https://consensys.net/privacy-policy/</a>)</p>
<p><u>Sanction Screening</u></p> <p>We use the following data to check whether wallets interacting with our platform might be subject to sanctions:</p> <ul style="list-style-type: none"> <li>• Wallet address</li> </ul> <p><u>How long we keep it</u></p> <p>We do not store your wallet address after comparing it against sanction lists</p>	<p>In some cases, if you use our Services, we may compare your wallet address against sanction lists.</p> <p><u>Legal basis</u></p> <p>We may process this data to comply with our legal obligations from time to time.</p> <p>We also use this to pursue our legitimate interests, including our interest in restricting the use of our Services by those who are subject to sanctions.</p>	<p><u>Sources &amp; Recipients</u></p> <p>We use TRM Labs, Inc, to carry out sanction checks</p>
<p><u>User Analytics</u> (<i>data about how you interact with our Services</i>) including:</p> <ul style="list-style-type: none"> <li>• <u>Log and Usage Data</u>: service-related, diagnostic, usage, and performance information our</li> </ul>	<p>We use cookies, similar technologies and other software to collect analytics data about users of our Services, to understand how people use them, where they come from, which devices and operating systems</p>	<p><u>Sources &amp; Recipients</u></p> <ul style="list-style-type: none"> <li>• We use Mixpanel, Rollbar and Google Analytics to process some of this data</li> </ul>

<p>servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).</p> <ul style="list-style-type: none"> <li>● <u>Device Data</u>. We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.</li> <li>● <u>Location Data</u>. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address).</li> </ul> <p><u>How long we keep it</u></p> <p>After 26 months underlying data is deleted, but we may retain aggregated statistics generated from that data which are anonymous.</p>	<p>they use, and how they interact with our Services, along with logs of errors which may occur in providing our Services, to help improve and maintain our Services, and to identify usage trends.</p> <p><u>Legal basis</u></p> <p>We process analytics data if you have given your consent.</p> <p><u>More information</u></p> <p>You can opt out of allowing us to collect this information either by refusing consent to our use of cookies and similar technologies, or (in the case of Location Data) by disabling your Location setting on your device.</p> <p>You can find out more about how Google processes analytics data by <a href="#">clicking here</a>.</p> <p>You can withdraw your consent for Google analytics by using the following link: <a href="#">Google Analytics</a>.</p>	<p>when we collect it from you.</p>
<p><u>Shareholder Data</u>: (data used to administer and manage your investment in our business) including:</p> <ul style="list-style-type: none"> <li>● Name;</li> <li>● Social media username</li> <li>● Phone number</li> <li>● Email address</li> </ul>	<p>We use this information to administer and manage your investment in our business, including to:</p> <ul style="list-style-type: none"> <li>● draft and sign the investment documentation (such as Subscription Agreement and Shareholders' Agreement);</li> </ul>	<p><u>Sources &amp; Recipients</u></p> <ul style="list-style-type: none"> <li>● Our bank account and blockchain wallet providers and those who provide AML screening services to us from time to</li> </ul>

<ul style="list-style-type: none"> <li>• Legal addresses, including home address</li> <li>• Blockchain wallet address</li> <li>• Photo ID</li> <li>• Bank account details</li> </ul> <p><u>How long we keep it</u> We retain your information for the duration of your investment in our business, while you are a shareholder, and for 5 years thereafter, unless required to retain it for longer by law.</p>	<ul style="list-style-type: none"> <li>• process your investment such as recording your payments into our bank account, or blockchain wallet addresses;</li> <li>• maintain statutory registers.</li> </ul> <p>Our legal basis for this processing is typically to perform our contract with you or take steps you request prior to entering a contract.</p> <p>We also use data for these purposes in accordance with our legal, tax, accounting, and associated obligations. The legal basis for this processing is compliance with legal obligations.</p> <p>We may use certain information (such as your name, contact details, and social media username) to understand whether you and we (and our shareholders) are well suited to a proposed investment. The legal basis for this processing is pursuit of our (and your, and our shareholders’) legitimate interests in ensuring that the parties to a proposed transaction are suitable.</p>	<p>time will receive your information.</p> <ul style="list-style-type: none"> <li>• We may also store this information in Google Drive.</li> </ul> <p>Please review the Google privacy policy to understand how they collect, use, and share personal information: <a href="https://support.google.com/drive/answer/2450387">https://support.google.com/drive/answer/2450387</a></p>
<p>Where explicit retention periods are not described above, we hold data for as long as necessary bearing in mind the purpose for which it was collected. To determine the appropriate period, we consider the amount, nature, and sensitivity of the data, the potential risk of unauthorised access, and legal requirements.</p>		

### 3. COOKIES, ANALYTICS AND SIMILAR TECHNOLOGIES

Cookies, pixels and other technologies store and access data on your device to help websites and apps work. This table explains their purpose, how long they last, and who else can access their data. We get your consent to use them unless they are essential for our sites, apps or services.

Most browsers allow control over cookies, for more information: [Google Chrome](#) | [Microsoft Edge](#) | [Mozilla Firefox](#) | [Microsoft Internet Explorer](#) | [Opera](#) | [Apple Safari](#).

Other settings to disable certain similar technologies: [Windows Advertising ID](#) | [iOS and Mac OS Ad Tracking](#) | [Google Analytics](#) | [Your Ad Choices](#).

Cookie/data	Duration	Purpose	Access
twid, d_prefs, auth_token, G_ENABLED_IDPS, kdt, cd0, guest_id, _widgetsettings	Between 3-12 months  (G_ENABLED_IDPS and _widgetsettings are stored until removed)	These are used to provide the Twitter widgets on our page	Twitter accesses these cookies to enable social media functionality on our website by checking whether you are logged in to Twitter when you visit our website.  You can find more information about how Twitter processes personal data here:  <a href="#">Twitter Privacy Policy</a>

Crisp Client cookies	6 months	These cookies are used to provide chat functionality on our website	N/A
Docusaurus	Until removed	These cookies are used by our documentation pages on our website to check whether you have already seen alerts or whether they should be highlighted	N/A
Mixpanel	12 months	Analytics - To help us understand how you use our Services, such as how often, so we can improve our Services.	N/A
_ga	2 years	Analytics - To help us understand how you use our Services, such as how often, so we can improve our Services.	You can find out how Google uses analytics data by <a href="#">clicking here</a> .

#### 4. TRANSFERS AND DISCLOSURE

Transfers	Your data is generally stored in the UK. Where we use data processors outside the UK or Europe and transfer personal data to a country which does not provide an adequate level of protection, we use contracts approved by the European Commission or UK Information Commissioner's Office which give personal data protection similar to that which it has in Europe. For more information, including regarding the specific safeguards used to protect data which is transferred internationally, drop us a line using the contact details at the start of this policy.
Disclosure	Other than as set out above, we may disclose your personal data: <ul style="list-style-type: none"> <li>• Where required by law, government, competent authorities, or the courts or to establish, exercise or defend our legal rights, and for the purposes of preventing crime and fraud (for example, we may share personal data with our professional advisors, investigators, or credit reference agencies).</li> <li>• With members of our corporate group, our suppliers, and subcontractors, as necessary for the purposes set out in this policy.</li> <li>• If involved in an investment, merger, acquisition, or sale of our organisation or assets, personal data we hold may be shared based on the legitimate interests of us, our shareholders, customers, and other parties to a transaction, unless those interests are outweighed by prejudicial impacts upon you.</li> </ul>