

Privacy Policy – CannaGreen Project

Effective Date: March 25th, 2025

This Privacy Policy explains how Real Estate and Service AP GmbH, a company registered in Zug, Switzerland ("we", "us", "our"), collects, uses, discloses, and protects your personal data in connection with the use of the CannaGreen Token (CGN), the associated platform, and related services.

1. Controller Information

The data controller is:

Real Estate and Service AP GmbH

Chamerstrasse 176, 6300 Zug, Switzerland

Email: petrovitsky@grower.com.ua

2. Types of Data Collected

We may collect the following categories of personal data:

- Identity Data: full name, date of birth, nationality, identification documents (e.g., passport).
- Contact Data: email address, phone number.
- Financial Data: wallet addresses, bank account (for fiat operations), source of funds.
- Technical Data: IP address, browser type, usage logs.
- KYC/AML Documentation: collected via trusted providers (e.g., SumSub, IDnow).

3. Purpose of Data Processing

We process your data for the following purposes:

- To verify your identity in accordance with KYC/AML regulations.
- To enable participation in the CannaGreen Token ecosystem.
- To comply with legal obligations (Swiss and EU financial and privacy laws).
- To communicate important updates about your account or the project.
- To ensure platform security and fraud prevention.

4. Legal Basis for Processing

We process your personal data based on:

- Your consent (Art. 6(1)(a) GDPR);
- Legal obligations under AML/KYC laws (Art. 6(1)(c) GDPR);
- Legitimate interests in securing our platform and ensuring compliance (Art. 6(1)(f) GDPR).

5. Data Sharing

We may share your data with:

- KYC/AML service providers (e.g., SumSub, IDnow);
- Swiss financial institutions or SROs for compliance checks;
- Legal or regulatory authorities, if required by law.

6. Data Transfers

Your data may be processed and stored within Switzerland or the European Economic Area (EEA). We ensure appropriate safeguards are in place for any international transfers, in line with GDPR requirements.

7. Data Retention

We retain your data only as long as necessary for the purposes outlined, and in accordance with Swiss financial record-keeping laws and EU regulations. Typically, KYC data is retained for up to 10 years after the end of the business relationship.

8. Your Rights (under GDPR)

You have the right to:

- Request access to your data;
- Correct or update inaccurate information;
- Request deletion of your data (where legally possible);
- Withdraw consent at any time;
- Object to certain processing;
- File a complaint with a supervisory authority.

9. Cookies and Tracking

We may use essential and analytical cookies for platform functionality and usage insights. You can manage cookie settings in your browser.

10. Contact for Privacy Concerns

For any questions or privacy-related requests, please contact us at:

petrovitsky@grower.com.ua

This Privacy Policy may be updated from time to time. Changes will be communicated via email or posted on the official CannaGreen platform.

Acknowledgement of Privacy Policy

I hereby acknowledge that I have read and understood this Privacy Policy. I agree to the collection and processing of my personal data as described above.

Participant:

Name: _____

Signature: _____

Date: _____