

Privacy Statement (24 February 2021)

1. [Thriven](#)

Thriven B.V. with address Louis Couperusplein 2, 2514 HP, Den Haag and registered with the chamber of commerce under number 81242883 (**Thriven**) is responsible for the processing of data as described in this privacy policy. This privacy statement sets out how Thriven processes your personal data. This Privacy Statement was last amended on 24 February 2021.

2. [What personal data do we process?](#)

When using the services or website of Thriven, we collect and process the following personal data: first name, last name, email address, country, city, address, zip-code, username, discord name, KYC information and other details so we can best assist you.

We do not knowingly collect any information from individuals under 18 years of age.

3. [Cookies](#)

Cookies are small and simple data files that are stored on your computer or mobile device when you use our website. The cookies we use are functional, analytical and marketing cookies. Functional cookies ensure the proper functioning of the website. The analytical cookies measure the use of the website so that we can implement improvements. When we use Google Analytics cookies, we sign a processor agreement with Google, we mask the last octet of the IP-address, we do not share personal data and we do not use the Google Analytics-cookies for other Google-services. The marketing cookies keep track of which advertisements you have seen and what your online search and buying behavior is so that we can show you relevant offers and content. We will only use marketing cookies if you have consented to the placing of marketing cookies. If you do not give permission for this, you will be shown random advertisements. If you do consent to the placing of the marketing cookies, you always have the option to adjust your browser settings so that your internet browser no longer stores marketing cookies. We would like to point out that the settings of each browser must be adjusted on every device you use. In addition, you can always choose to delete your cookie history via your browser settings.

4. [From whom do we collect information](#)

Thriven collects personal data from the following types of individuals:

- Individuals contacting us;
- Website users;
- Website registrants;
- Customers who have an account on a third-party service such as exchanges or wallets and add API keys for this service to our software;
- Clients and representatives and ultimate beneficial owners of clients.

5. [What is the purpose and the grounds of our processing?](#)

We process personal data for the purpose of providing our service, for improving our website and services, for compiling user statistics, for marketing purposes and in order to comply with statutory obligations.

The legitimate basis for the processing of personal data will be – depending on the type of personal data concerned – the following:

- We need to process personal data for the purpose of fulfilling our contractual obligations to you, for instance to register an account, to execute our services properly and to keep our software-based services safe and secure, to allow us to work with a third-party service such as exchanges or wallets and add API keys for this service to our software and making a payment for the license fee for our software;
- We need to process certain personal data in order to meet legislation on business accounting and tax purposes;
- We have an interest in processing data, for instance for marketing purposes, to administer its internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, unless your privacy interests outweigh our interest;
- If none of the aforementioned bases for processing apply, then we will request your consent to process certain personal data. You are free to withdraw your consent at any time.

6. [Payment Services](#)

We use several payment service providers (PSP) to process the transactions initiated from our website. Any information related to the payment is processed directly by their servers and we do not store payment details or personal data related to the payments in full.

ThriveN receives and stores sensitive payment details depersonalized and masked for technical purposes. ThriveN also receives and stores some insensitive payment details and personal data in the part necessary for business accounting and tax purposes. For the protection of your personal data relating to the payment process, please refer to third party PSPs privacy policies when making the payment.

7. [Disclosing your information](#)

In order to provide our service, we engage the services of other parties to process personal data on our behalf. Sometimes we are legally obliged or a court will order us to hand over personal data to such parties as the Dutch Tax and Customs administration, the police or a regulatory body.

If we instruct a third party to process personal data on our behalf and we have and retain control over the processing, we will sign a written processing agreement with the third party concerned (the 'processor'). That document will lay down agreements on such points as the objective, the duration and scope of the processing, the retention times and the security measures for the personal data. A processor within the meaning of the GDPR could (for example) be a party carrying out certain IT work for us or a financial service provider facilitating payments.

We do not sell or otherwise disclose without consent the personal data it holds, except where there is a legal requirement, allowed under applicable legislation.

8. [Transferring your information](#)

We will endeavor to process your data solely within the European Union by saving your data on a server located in the EU wherever possible. Sometimes this will not be possible. When we engage the services of data processors, we stipulate that – where possible - they must save personal data on servers located in the EU. To the extent that this is not possible, we take the necessary measures to provide a suitable level of protection to ensure that your personal data is secure.

9. [Storing your information](#)

We adopt appropriate data storage measures to protect against unauthorized access, alteration, disclosure or destruction of your personal data.

When we transfer your personal data, we take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Statement. We ensure that both we and our partners take adequate and appropriate technical, physical and organizational security measures to protect your data. We also put in place data transfer agreements and other contractual protections with these third parties, using European Commission approved terms.

10. [Protecting your information](#)

Thriven is committed to data security and protection of your personal data. All data is protected by security integrated safeguards appropriate to the level of sensitivity of the data through physical measures, such as secure areas, technical measures, such as encryption and secure servers, and organizational and administrative measures.

Thriven only retains personal data for as long as it is legal and necessary for the purposes for which it was collected.

11. [Your rights to your information](#)

You are entitled, under certain circumstances, to access any personal data processed by us or to have it corrected or deleted or restrict its processing. Sometimes you can also lodge an objection or request a transfer of your personal data. To submit a request to us in this respect, please contact us by sending an email to support@thriven.nl. If in doubt about your identity, we are entitled to ask you to provide proof of your identity first.

You have the right to inspect, restrict and correct your personal data, after a written request. Thriven will respond to your requests within a reasonable time, within 30 days, unless there is a valid reason for not doing so, at which point you will be notified. If we receive a request for access or rectification, we may ask you to verify your identity before acting on the relevant request, to ensure your information is protected and kept secure. In any case, you are able to modify and update some of your personal information by logging into your account on our Website.

You hereby agree that the stopping of processing or erasing your personal data at your wish may affect the quality of service provision and may lead to termination of agreements between Thriven and you.

If you no longer wish to receive email messages or any other electronic messages from us, then you can deregister for these by clicking on the unsubscribe button in an email message received from us. You can also deregister by contacting us.

12. [Changes to this Privacy Policy](#)

Thriven has the discretion to update this Privacy Statement at any time. When we do, we revise the updated date at the top of this page. We encourage you to frequently check this page for any changes to stay informed. You acknowledge and agree that it is your responsibility to review this Privacy Statement periodically and become aware of modifications.

13. [Contacting us](#)

Please contact us via support@thriven.nl if you have any questions about this Privacy Statement or about the personal data we hold about you.

You can also submit a complaint to the Dutch Data Protection Authority via www.autoriteitpersoonsgegevens.nl.
