## **Utopian Contributors LLC Privacy Policy**

Effective Date: November 16, 2025

At Utopian Contributors, we are profoundly committed to protecting your personal data and ensuring your privacy. This policy outlines our protective stance, how we collect, use, and safeguard your data, and your rights under the European Union's General Data Protection Regulation (GDPR) and the California Consumer Privacy Act/California Privacy Rights Act (CCPA/CPRA).

# 1. Principles of Data Protection and Transparency

We adhere to the following principles to ensure the highest standard of data protection:

- **Fairness and Lawfulness:** Processing data only where we have a clear legal basis and with the user's full knowledge.
- **Purpose Limitation:** Collecting data only for specific, explicit, and legitimate purposes clearly stated below.
- Data Minimization: Collecting only the data strictly necessary for our stated purposes.
- Accuracy: Maintaining accurate and up-to-date data.
- Storage Limitation: Retaining data only as long as necessary for the stated purposes.
- **Integrity and Confidentiality:** Implementing robust security measures to protect against unauthorized or unlawful processing and accidental loss.

# 2. Data We Collect and Our Lawful Basis for Processing

We collect minimal data necessary to provide our service. The following table details the categories of data, the specific purpose for collection, and the legal basis for processing, as required by GDPR:

Category of Personal Data	Specific Data Points Collected	Purpose of Processing	Lawful Basis (GDPR)
Identity Data	Name, Email Address	Account creation, essential service communication, and identity verification.	Contract (Necessary for service)
Blockchain Data	Non-custodial Crypto Wallet Address	Facilitating decentralized transactions and service contributions.	Contract (Necessary for service)
Usage Data	IP address, device type, browser information, pages visited, time spent on the app/site.	Essential operational analytics (security, performance), and to fulfill our legitimate interest in improving the user experience.	Legitimate Interest (Service improvement & Security)
Transaction Data	(No direct collection of payment card information. This data is handled by our third-party processor.)	Processing and verifying transactions.	Contract (Necessary for service)

#### 3. How We Use Your Personal Data

We use your data only for the purposes explicitly listed below. We will never process your data for new, incompatible purposes without informing you and, where required, obtaining a new consent.

- **To Provide and Maintain the Service:** To create and manage your account and facilitate contributions.
- Security and Fraud Prevention: To monitor for and prevent malicious activity.
- **Service Improvement (Analytics):** To understand how our services are used to make informed improvements. **Note:** This is only performed using anonymized or aggregated data where possible.
- Legal Compliance: To comply with all applicable legal and regulatory obligations.

# 4. Strict Data Sharing and Disclosure

Your data is not for sale. **We do not sell or share your personal information to third parties** for cross-context behavioral advertising. We only disclose your data under the following highly restricted conditions:

Recipient Category	Purpose of Sharing	Protective Requirement
Payment Processors	To securely process financial transactions.	Data is tokenized; we only share the minimum required for the transaction. Processor is contractually obligated to meet GDPR/CCPA standards.
Analytics Providers	To understand service usage and performance.	Data is shared only in anonymized or pseudonymized form to prevent re-identification.
Legal Obligations	When required by law or to protect our rights (e.g., court order).	We challenge any overbroad request and notify the user unless legally prohibited.

# 5. Your Data Protection Rights (GDPR & CCPA/CPRA)

You have extensive rights over your personal data. We are committed to honoring these requests promptly and without undue delay.

Right	Description	Applicability
Right to Know/Access	The right to know what personal data is being collected and to obtain a copy of the specific pieces of data collected.	EU & California
Right to Deletion	The right to request the deletion of your personal data (The Right to be Forgotten).	EU & California
Right to Correction	The right to rectify inaccurate or incomplete personal data.	EU & California

EU & Right to The right to object to processing based on legitimate Object/Opt-Out interests, and to opt-out of the "sale" or "sharing" of California personal information (even though we do not sell or share). Right to Data The right to receive your personal data in a structured, EU **Portability** commonly used, and machine-readable format. Right to California The right not to be discriminated against for exercising Non-Discriminatio your privacy rights.

#### **How to Exercise Your Rights:**

To exercise any of these rights, please submit a verifiable request to our Data Protection Officer at: **ludwig@utopiancontrib.com** 

## 6. Data Security and Retention

- Security Measures: We use advanced technical and organizational measures, including encryption (in transit and at rest), pseudonymization, and strict access controls to protect your data from unauthorized access or disclosure.
- Retention: We retain your personal data only for as long as necessary to fulfill the
  purposes for which it was collected or as required by law. For account holders, data is
  generally retained for the life of the account plus a short reconciliation period (e.g., 90
  days) after closure, after which it is securely deleted.

### 7. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes to our practices or for other operational, legal, or regulatory reasons. We will notify you of any material changes by posting the new policy on our website and updating the "Effective Date" at the top of this document. We encourage you to review this policy periodically.

# 8. Contact Information

If you have any questions or concerns about this Privacy Policy or our data practices, please contact us at:

**Utopian Contributors LLC** 

Address: 1021 East Lincolnway #1252, Cheyenne, Wyoming 82001

Email: ludwig@utopiancontrib.com

Data Protection Officer/Privacy Request Portal: ludwig@utopiancontrib.com