PRIVACY POLICY

QoreChain Association
Registered in Switzerland
Email: team@qorechain.io
Effective Date: 17.11.2025
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1. INTRODUCTION

Welcome to QoreChain. QoreChain Association ("QoreChain," "we," "us," or "our") is committed to protecting your privacy and ensuring transparency in how we collect, use, and safeguard your personal information.

This Privacy Policy explains how we collect, use, disclose, and protect your information when you access or use:

- Our website at qorechain.io and dashboard.qorechain.io (the "Website")
- Our blockchain network and associated services (the "Network")
- Our AI-powered development tools including Smart Contract Generator and Auditor (the "AI Tools")
- Any related services, features, or functionalities (collectively, the "Services")

By accessing or using our Services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree with this Privacy Policy, please do not use our Services.

Important Note on Blockchain Technology: The QoreChain Network operates on distributed ledger technology. Certain information recorded on the blockchain is permanent, immutable, and publicly accessible by design. This Privacy Policy explains the distinction between traditional data we control and blockchain data that cannot be altered or deleted.

2. AGE RESTRICTIONS AND ELIGIBILITY

You must be at least 18 years of age (or the age of majority in your jurisdiction, whichever is higher) to use our Services. We do not knowingly collect or solicit personal information from anyone under the applicable age of majority. If you are under 18 (or the applicable age of majority), please do not attempt to register for the Services or send any personal information about yourself to us.

If we learn that we have collected personal information from a person under the applicable age of majority, we will delete that information as quickly as possible. If you believe that we might have any information from or about a person under the applicable age of majority, please contact us at team@qorechain.io.

3. INFORMATION WE COLLECT

3.1 Information You Provide Directly

Account Registration (via Google OAuth) When you create an account using Google Sign-In, we collect:

- Full name
- Email address
- Google profile identifier
- Profile picture (if available)
- Account creation timestamp

Wallet Information

- Blockchain wallet addresses you connect or create
- Public keys associated with your account
- Wallet labels or nicknames you assign

Communications

- Messages you send through our support channels
- Feedback and survey responses
- Newsletter subscription preferences

AI Tool Inputs

- Prompts and queries submitted to our AI Smart Contract Generator
- Code snippets uploaded for AI Smart Contract Auditor analysis
- Configuration parameters and preferences

3.2 Information Collected Automatically

Usage Data

- IP address and geolocation (country/region level)
- Device information (type, operating system, browser type and version)
- Pages visited, features used, and time spent on Services
- Referral sources and exit pages
- Date and time stamps of activities

Blockchain Network Data

- Transaction hashes and timestamps
- Smart contract deployment and interaction records
- Gas fees and network performance metrics
- Cross-chain bridge activity
- Node performance data (if you operate a validator)
- Staking and delegation activities

Performance and Analytics

- Error logs and crash reports
- Network latency and throughput metrics
- Feature usage statistics
- A/B testing participation and results

3.3 Cookies and Tracking Technologies

We use cookies and similar tracking technologies to operate and improve our Services:

Essential Cookies (Required for functionality):

- Authentication tokens and session management
- Security and fraud prevention
- Load balancing and performance optimization

Analytics Cookies (Used to improve Services):

- Google Analytics: Website traffic and user behavior analysis
- Amplitude: Product usage patterns and feature adoption
- Custom analytics for blockchain network performance

You can control cookie preferences through your browser settings. However, disabling essential cookies may prevent you from accessing certain features of our Services.

For detailed cookie information, including specific cookies used, retention periods, and opt-out options, please see our Cookie Policy at [COOKIE POLICY URL].

3.4 Information from Third Parties

Google OAuth Provider

- Identity verification data from Google
- Email verification status
- Account security information

Blockchain Data Providers

- Public blockchain transaction data
- Token balance information from connected wallets
- Smart contract interaction histories

Analytics and Service Providers

- Aggregated demographic information
- Device and browser fingerprinting data
- Fraud detection signals

4. HOW WE USE YOUR INFORMATION

4.1 Primary Uses

We use your information for the following purposes:

Service Delivery and Operation

- Create and manage your account
- Authenticate and authorize access to Services
- Process blockchain transactions and smart contract deployments
- Provide AI-powered development tools functionality
- Link wallet addresses to your user profile for seamless interaction
- Enable cross-chain operations and interoperability features

AI Model Training and Improvement

- Analyze prompts and inputs submitted to AI Tools (logged but not permanently stored)
- Train and improve our AI Smart Contract Generator and Auditor models
- Develop new AI features and capabilities
- Enhance natural language processing accuracy
- Improve code generation and security audit quality

Platform Improvement and Analytics

- Monitor and analyze usage patterns and trends
- Conduct product research and development
- Test new features and improvements (A/B testing)
- Optimize network performance and scalability
- Debug technical issues and improve system reliability

Communication and Support

- Respond to your inquiries and support requests
- Send transactional emails (account notifications, security alerts)
- Provide technical assistance and troubleshooting
- Send service announcements and updates

Marketing and Promotional Activities

- Send newsletters about QoreChain developments
- Deliver product updates and new feature announcements
- Share promotional offers and incentives
- Conduct market research and surveys
- Personalize marketing content based on your interests and usage

Security and Fraud Prevention

- Detect and prevent fraudulent activities
- Monitor for security threats and vulnerabilities
- Enforce our Terms of Service and policies
- Protect against malicious actors and abuse
- Conduct security audits and risk assessments

Legal Compliance and Protection

- Comply with applicable laws and regulations
- Respond to legal requests and prevent illegal activities
- Enforce our legal rights and defend against claims
- Conduct audits and maintain records as required by law

4.2 Legal Bases for Processing (GDPR)

For users in the European Economic Area (EEA), United Kingdom, and Switzerland, we process your personal data based on the following legal grounds:

- **Contractual Necessity**: Processing necessary to provide the Services you've requested
- **Legitimate Interests**: Fraud prevention, security, analytics, and product improvement (where not overridden by your rights)
- **Consent**: Marketing communications, non-essential cookies, and AI model training (where required)
- **Legal Obligation**: Compliance with laws, regulations, and legal processes

5. HOW WE SHARE YOUR INFORMATION

We do not sell, rent, or trade your personal information to third parties for their marketing purposes. We share your information only in the following circumstances:

5.1 Service Providers and Partners

We engage trusted third-party service providers to perform functions on our behalf:

Analytics and Performance

- Google Analytics (Google LLC) - Website and user behavior analytics
- Amplitude (Amplitude, Inc.) - Product analytics and usage patterns
- AWS (Amazon Web Services) - Cloud infrastructure and hosting

Authentication and Security

- Google OAuth (Google LLC) - User authentication and identity verification
- Security and fraud detection services

Communication Services

- Email service providers for transactional and marketing emails

- Customer support platforms

These service providers have access to your personal information only to perform specific tasks on our behalf and are obligated to protect your information and use it only for the purposes we specify.

5.2 Blockchain Network Participants

By design, certain information is shared with the QoreChain Network:

Public Blockchain Data (Permanently recorded and publicly accessible):

- Wallet addresses involved in transactions
- Transaction amounts, timestamps, and hashes
- Smart contract deployments and interactions
- Token transfers and balances
- Validator and staking activities

Network Participants:

- Validators and node operators who process transactions
- Other network users who query blockchain data
- Blockchain explorers and indexing services
- Cross-chain bridge protocols and connected networks

Important: This blockchain data is pseudonymous but NOT anonymous. While your real-world identity is not directly recorded, blockchain analytics firms and sophisticated actors may be able to correlate wallet addresses with identities through various means.

5.3 Business Transfers

In the event of a merger, acquisition, financing, reorganization, bankruptcy, or sale of assets, your information may be transferred as part of that transaction. We will notify you via email and/or prominent notice on our Website of any change in ownership or use of your personal information.

5.4 Legal Requirements and Protection

We may disclose your information when we believe in good faith that disclosure is necessary to:

- Comply with applicable laws, regulations, legal processes, or governmental requests
- Enforce our Terms of Service, policies, or other agreements
- Protect the security, rights, or property of QoreChain, our users, or the public
- Detect, prevent, or address fraud, security, or technical issues
- Respond to claims of violations of the rights of third parties

5.5 With Your Consent

We may share your information for purposes not described in this Privacy Policy when we have your explicit consent to do so.

6. INTERNATIONAL DATA TRANSFERS

QoreChain is based in Switzerland, and our Services are accessible globally. We process and store information in Switzerland, the United States, and other jurisdictions where our service providers operate, including the European Union, Asia, Turkey, and Latin America.

6.1 Transfer Mechanisms

When we transfer personal data from the EEA, UK, or Switzerland to other countries, we implement appropriate safeguards, including:

EU-U.S. Data Privacy Framework (where applicable)

- Compliance with Privacy Shield principles for U.S. transfers

Standard Contractual Clauses (SCCs)

- European Commission-approved model contracts with service providers
- Supplementary measures where required to ensure adequate protection

Adequacy Decisions

- Reliance on European Commission adequacy decisions for certain countries

Swiss-U.S. Data Privacy Framework (where applicable)

- Compliance with Swiss data protection requirements

6.2 Your Rights Regarding International Transfers

If you are located in the EEA, UK, or Switzerland, you have the right to:

- Obtain information about the safeguards we use for international transfers
- Object to transfers where safeguards are insufficient
- Request copies of Standard Contractual Clauses

For questions about international data transfers, contact us at team@qorechain.io.

7. DATA RETENTION

7.1 Traditional Data Retention

Active Accounts

- Account information: Retained while your account is active

- Usage data and logs: Typically retained for 12-24 months for analytics and security purposes
- AI tool inputs: Logged for training purposes, then deleted within 90 days
- Marketing preferences: Retained until you unsubscribe or delete your account

Deleted Accounts

- Upon account deletion, we delete or anonymize your personal information within 30 days
- Certain information may be retained longer if required by law or legitimate business purposes (e.g., fraud prevention, legal compliance)
- Aggregated, anonymized data may be retained indefinitely for analytics

Legal and Security Retention

- Information related to legal disputes or investigations: Retained as necessary
- Security incident logs: Retained for up to 7 years
- Financial records: Retained as required by applicable law (typically 7-10 years)

7.2 Blockchain Data Retention

Immutable Data

- Blockchain transactions, smart contracts, and associated data are permanent and immutable by design
- This information CANNOT be deleted, modified, or anonymized once recorded on the blockchain
- Even after account deletion, your blockchain wallet addresses and transaction history remain publicly accessible

What This Means:

- Consider carefully before executing blockchain transactions
- Use separate wallets for privacy-sensitive activities
- Blockchain data exists independently of your QoreChain account
- We cannot comply with deletion requests for blockchain-recorded data

8. YOUR PRIVACY RIGHTS

Your rights vary depending on your location. We respect and facilitate the exercise of your privacy rights under applicable laws.

8.1 Rights for All Users

- **Access**: Request access to the personal information we hold about you
- **Correction**: Request correction of inaccurate or incomplete information
- **Deletion**: Request deletion of your account and personal information (subject to blockchain limitations)
- **Marketing Opt-Out**: Unsubscribe from marketing communications at any time

- **Cookie Control**: Manage cookie preferences through your browser

8.2 Additional Rights (GDPR - EEA, UK, Switzerland)

If you are located in the EEA, UK, or Switzerland, you have additional rights:

- **Portability**: Receive your personal data in a structured, machine-readable format
- **Restriction**: Request restriction of processing under certain circumstances
- **Object**: Object to processing based on legitimate interests or for direct marketing
- **Withdraw Consent**: Withdraw consent at any time (without affecting prior processing)
- **Automated Decision-Making**: Right not to be subject to decisions based solely on automated processing
- **Lodge a Complaint**: File a complaint with your local data protection authority

Swiss Users: Contact the Federal Data Protection and Information Commissioner (FDPIC)
EEA/UK Users: Contact your national supervisory authority

8.3 California Privacy Rights (CCPA/CPRA)

California residents have specific rights under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA):

Right to Know

- Categories of personal information collected
- Categories of sources
- Business or commercial purposes for collection
- Categories of third parties with whom we share information
- Specific pieces of personal information collected

Right to Delete

- Request deletion of personal information (subject to exceptions)

Right to Opt-Out

- We do not sell or share personal information for cross-context behavioral advertising
- We do not sell personal information of users under 16

Right to Non-Discrimination

- Equal service and pricing regardless of privacy rights exercise

Right to Correct

- Request correction of inaccurate personal information

Right to Limit Use of Sensitive Personal Information

- Request limitation on use of sensitive personal information (where applicable)

Authorized Agent

- Designate an authorized agent to make requests on your behalf

8.4 Other Jurisdictions

Brazil (LGPD): Rights similar to GDPR, including access, correction, deletion, and portability

Turkey (KVKK): Rights to access, correction, deletion, and objection to processing

Asia-Pacific (PDPA and similar): Rights vary by country but generally include access, correction, and opt-out rights

8.5 How to Exercise Your Rights

To exercise any of these rights, please contact us at:

- **Email**: team@qorechain.io
- **Subject Line**: "Privacy Rights Request - [Your Right]"
- **Include**: Your full name, email address, and specific request

Response Time:

- GDPR requests: Within 30 days (extendable by 60 days if complex)
- CCPA requests: Within 45 days (extendable by 45 days if necessary)
- Other jurisdictions: As required by local law

Verification:

- We may request additional information to verify your identity before processing requests
- This protects your information from unauthorized access

No Fee:

- We do not charge a fee for most privacy rights requests
- Excessive or repetitive requests may incur a reasonable fee

9. DATA SECURITY

We implement industry-standard security measures to protect your information:

9.1 Technical Safeguards

Encryption

- TLS/SSL encryption for data in transit
- Encryption at rest for sensitive data
- Post-quantum cryptography (PQC) for blockchain operations (ML-KEM Kyber-1024, ML-DSA Dilithium-5)

Access Controls

- Multi-factor authentication (MFA) for accounts
- Role-based access control (RBAC) for internal systems
- Principle of least privilege for data access

Infrastructure Security

- Secure cloud infrastructure (AWS)
- Regular security audits and penetration testing
- DDoS protection and rate limiting
- Intrusion detection and prevention systems

9.2 Organizational Safeguards

Policies and Training

- Employee confidentiality agreements
- Regular security awareness training
- Data protection impact assessments (DPIAs)
- Incident response and breach notification procedures

Vendor Management

- Security requirements for third-party service providers
- Regular vendor security assessments
- Data processing agreements with appropriate safeguards

9.3 Limitations

User Responsibility

- You are responsible for maintaining the security of your account credentials
- Use strong, unique passwords and enable MFA
- Do not share your account access with others
- Secure your connected blockchain wallets

No Absolute Security

- No method of transmission or storage is 100% secure
- We cannot guarantee absolute security of your information
- You use our Services at your own risk

Blockchain Security

- Blockchain transactions are irreversible; verify carefully before confirming
- Lost wallet private keys cannot be recovered
- We are not responsible for losses due to user error or wallet compromise

9.4 Data Breach Notification

In the event of a data breach that affects your personal information, we will:

- Notify affected users without undue delay (within 72 hours where required by GDPR)
- Report to relevant supervisory authorities as required by law
- Provide information about the breach and steps we're taking to address it
- Advise you on protective measures you can take

10. THIRD-PARTY LINKS AND SERVICES

Our Services may contain links to third-party websites, applications, or services that are not operated by QoreChain. This includes:

- Blockchain explorers and indexing services
- Third-party DeFi protocols and dApps
- External wallets and wallet providers
- Social media platforms
- Partner websites and services

Important: We are not responsible for the privacy practices of these third parties. We encourage you to read their privacy policies before providing any information. This Privacy Policy applies only to information collected by QoreChain.

11. AI AND AUTOMATED DECISION-MAKING

11.1 AI Tool Usage

Our AI Smart Contract Generator and Auditor use machine learning models to:

- Generate smart contract code based on natural language prompts
- Analyze smart contracts for security vulnerabilities and optimization opportunities
- Provide development suggestions and best practices

How Your Input Is Used:

- Prompts and queries are logged (not permanently stored) for quality assurance
- Inputs are used to train and improve our AI models
- Data is aggregated and anonymized before training
- Individual inputs are deleted within 90 days

Your Control:

- You can opt out of AI training by contacting team@qorechain.io
- Opting out may limit functionality of AI Tools

11.2 Automated Decision-Making

We do not use automated decision-making that produces legal or similarly significant effects without human oversight. AI-generated outputs (such as smart contracts) are recommendations only; you maintain full control over implementation decisions.

For EEA/UK/Swiss users: You have the right not to be subject to decisions based solely on automated processing. Contact us if you have concerns about automated decision-making.

12. DO NOT TRACK SIGNALS

Some browsers include a "Do Not Track" (DNT) feature that signals to websites that you do not want your online activities tracked. Due to lack of industry consensus on DNT interpretation, our Services do not currently respond to DNT signals.

However, you can control tracking through:

- Browser cookie settings
- Opting out of analytics cookies in our Cookie Policy
- Using browser privacy extensions
- Exercising your privacy rights as described in Section 8

13. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other operational reasons.

Notification of Changes:

- Material changes: Email notification to registered users at least 30 days before effective date
- Non-material changes: Updated "Last Updated" date at the top of this policy
- Continued use of Services after changes constitutes acceptance

Your Options:

- Review changes when notified
- Contact us with questions or concerns
- Stop using Services if you disagree with changes
- Delete your account before changes take effect

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your information.

14. CHILDREN'S PRIVACY

Our Services are not directed to individuals under 18 years of age (or the age of majority in their jurisdiction, whichever is higher). We do not knowingly collect personal information from children.

If You Are a Parent or Guardian: If you believe your child has provided personal information to us, please contact us immediately at team@qorechain.io. We will delete such information from our systems as quickly as possible.

Age Verification: We rely on user self-certification of age during account creation. If we discover that a user is under the required age, we will terminate the account and delete associated information (subject to legal retention requirements).

15. CONTACT US

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

QoreChain Association
Email: team@qorechain.io
Subject Line: "Privacy Inquiry"

Data Protection Officer (for GDPR inquiries):
Email: team@qorechain.io
Subject Line: "DPO - Privacy Request"

Response Time: We aim to respond to all inquiries within 5-10 business days.

Supervisory Authority (EEA/UK/Switzerland):
If you are unsatisfied with our response, you have the right to lodge a complaint with your local data protection authority.

16. SPECIFIC JURISDICTIONAL PROVISIONS

16.1 European Economic Area, United Kingdom, and Switzerland

Data Controller: QoreChain Association, Switzerland

Legal Basis Summary:

- Contractual necessity for service provision
- Legitimate interests for analytics, security, and improvement
- Consent for marketing and non-essential cookies
- Legal compliance for regulatory obligations

International Transfers: As described in Section 6

Representative: For inquiries, contact team@qorechain.io

16.2 California, United States

Business Purpose Categories (last 12 months):

- Account management and service delivery
- Marketing and communications
- Analytics and product improvement
- Security and fraud prevention
- Legal compliance

Categories of Personal Information Collected: As described in Section 3

Sources: Directly from you, automatically from devices, from third-party authentication providers

Third-Party Disclosure: Service providers only (no sales)

Retention: As described in Section 7

CCPA Rights: As described in Section 8.3

Authorized Agent: You may designate an authorized agent by providing written authorization

Financial Incentives: We do not offer financial incentives for personal information collection

16.3 Brazil

Data Controller: QoreChain Association

Legal Basis: LGPD compliance for data processing activities

Rights: Access, correction, deletion, portability, and consent withdrawal

Data Protection Authority: Autoridade Nacional de Proteção de Dados (ANPD)

16.4 Turkey

Data Controller: QoreChain Association

KVKK Compliance: Processing in accordance with Turkish Personal Data Protection Law

Rights: Information, access, correction, deletion, objection

Data Protection Authority: Kişisel Verileri Koruma Kurumu (KVKK)

16.5 Asia-Pacific Jurisdictions

Singapore (PDPA): Consent-based processing with purpose limitation

Thailand (PDPA): Data subject rights including access and deletion

Other APAC: Compliance with local data protection regulations

17. GLOSSARY OF TERMS

Blockchain: A distributed ledger technology that records transactions across multiple computers in a way that makes records immutable.

Personal Data/Personal Information: Information that identifies, relates to, or could reasonably be linked with you or your household.

Processing: Any operation performed on personal data, including collection, storage, use, disclosure, or deletion.

Controller: The entity that determines the purposes and means of processing personal data (QoreChain Association).

Processor: An entity that processes personal data on behalf of the controller (our service providers).

Pseudonymization: Processing that renders personal data non-identifiable without additional information kept separately.

Wallet Address: A unique alphanumeric identifier on a blockchain that can send and receive transactions.

Smart Contract: Self-executing code deployed on a blockchain that automatically enforces agreement terms.

Gas Fees: Transaction fees paid to process operations on a blockchain network.

18. ACKNOWLEDGMENT AND ACCEPTANCE

By using QoreChain's Services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy.

You specifically acknowledge and accept that:

- Blockchain data is permanent, immutable, and publicly accessible
- We cannot delete information recorded on the blockchain
- AI tool inputs may be used for model training
- Your information may be transferred internationally
- You meet the minimum age requirement for your jurisdiction
- You have the authority to provide any personal information you share

If you do not agree with this Privacy Policy, you must not use our Services.

END OF PRIVACY POLICY

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For the latest version of this Privacy Policy, please visit: https://qorechain.io/privacy