



**mavin**  
Content. Integrity. Movement.

## Privacy policy

### Introduction

At Mavin.org ("Mavin") we appreciate your contribution and support to fight misinformation and place a high value on your personal privacy. We respect the personal nature of the information you provide us on our website and faithfully recognize the importance of protecting this information. In adopting this privacy policy (this "Privacy Policy"), our intent is to balance our legitimate business interests in collecting and using your personal information with your reasonable expectations of privacy and in line with the General Data Protection Regulation ("GDPR").

Mavin takes your privacy very seriously and shall handle your (personal) data with the utmost security and care. In this Privacy Policy, you will learn how we handle your data as well as learn about your rights concerning our processing of your data. We advise that you read this Privacy Policy carefully. In case you have any questions or remarks, please contact us at [privacy@mavin.org](mailto:privacy@mavin.org).

### Description of Mavin

Mavin is developed by the 'Limited Liability Company The Floq BV', with registered office at Zuid-Hollandlaan 7, 2596 AL, Den Haag, The Netherlands and listed at the Traderegister of the Dutch Chamber of Commerce under 61154466.

The Floq BV is as the controller under the GDPR ultimately responsible for the correct processing of your personal data.

Mavin has appointed a data protection officer. You may contact Mark van Rijmenam at [privacy@mavin.org](mailto:privacy@mavin.org).

### The data we collect

Mavin may collect the following information for the purpose(s) described below:

- initials, name and surname;
- company name and function;
- email address;
- phone number;
- bank and payment details (in case of a subscription);
- content of (online) communication;
- linked social media accounts (optional);
- IP address;
- details of your browser;
- duration of your visits to our website; and
- your click behaviour during your visits to our website.

## Usage of your personal data

Mavin will collect the personal data mentioned in this Privacy Policy exclusively for the following purposes:

- to provide our services to you, including but not limited to the execution of agreements you have entered into, to verify your identity (KYC), to complete order management and invoicing, to create a membership account, to maintain accurate information about you, and/or to carry out or respond to questions, requests, complaints and/or instructions from you;
- to carry out, monitor, analyse and improve our business;
- to troubleshoot, operate and improve our (digital) services and our website; and
- to send newsletters, marketing communications, and/or other information that may interest you and if given consent to.

## Legal basis for processing your personal data

Mavin will process your above-mentioned personal data exclusively on the (legal) basis listed below, as such in accordance with article 6 of the GDPR:

- given consent to the processing (you may withdraw your consent at any time);
- for the performance of your contract;
- for compliance with a legal obligation to which Mavin may be or is subject(ed); and
- for the purposes of the legitimate interests pursued by Mavin.

## How we obtain your personal data

Mavin has obtained your data because you have provided this data to us by using our service. You provide data by creating an account on Mavin.org, by using the Mavin.org website or by using any of the Mavin tools.

## Retention of your personal data

Mavin will retain your personal data for as long as legally required or for as long as necessary to provide you with any requested services or for any of the other purposes listed in this Privacy Policy.

In the interest of maximum transparency, we list below a few examples of the retention periods for personal data:

- The retention period for accounting records and financial administration is 7 years in accordance with tax legislation.
- The retention period for your requests, questions and our responses and other actions to handle your request is 6 months after your question or complaint has been solved or the inquiry was closed.

We will take reasonable steps to destroy or de-identify personal data we hold if it is no longer needed for the purposes set out above or after the expiration of the defined retention term.

# Your rights

Under the GDPR you have a number of rights with regard to your data and the processing thereof:

## Access

You may access your personal information and make any necessary changes in your account. If you would like to see which personal data Mavin has obtained about you, you may exercise your right of access by submitting a request to Mavin. You have the right to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format. In addition, if you have an account on Mavin, you can also delete any data that we have collected from you.

## Rectification

If you wish to make changes to the personal information that you have seen as a result of a request for access and you are unable to make the changes yourself in your account, you may request that Mavin makes these changes for you. You may request that Mavin modifies, corrects, supplements, erases or shields your information.

## Restriction of processing of personal data

You also have the right, under certain conditions, to ask Mavin to restrict the processing of your personal data.

## Right to object

If processing of your data takes place on the grounds of 'legitimate interest' by Mavin or a third party, you have the right to object to that processing. The right to object does not apply to any ratings that Mavin users have provided on any content, any time. Any rating provided by Mavin users or the Mavin AI do not reflect the opinion of Mavin (The Floq BV) at any time and, therefore, Mavin cannot be held responsible for these ratings.

## Portability of data

You have the right to obtain your personal data from Mavin. Mavin will provide this in a structured and commonly used format, which can easily be opened using commonly used digital systems.

## Right to erasure

You may request that we erase data concerning yourself that we have recorded, for example if you object to the processing of your personal data.

## Automated processing

Mavin uses AI to determine the initial Mavin Trust Score of an article. The Mavin Trust Score directly influences the Mavin Reputation Score of the author of that content. The more users that will rate an article, the smaller the influence of the AI will be on the Mavin Trust Score. The Mavin AI is completely open source and at any time you can analyse how the Mavin AI rates content. You can provide feedback on how we should improve the AI, but we cannot remove any ratings by our AI as these are stored on chain. The Mavin Reputation Score determines the influence your rating has on a particular topic and determines the number of Mavin Tokens a user can earn. We use algorithms to determine the number of tokens you earn. At all times, anyone will be able to investigate the blockchain, collect all ratings that belong to a piece of content or user and calculate themselves to see if the Mavin Trust Score or the Mavin Reputation Score has been calculated correctly. In case of a mismatch, you can contact us and we will then investigate the issue.

## Withdrawing consent

When the legal basis for a particular processing is your explicit consent, you have the right to withdraw that consent. This does not affect past processing but does mean that we will no longer be allowed to process this data in the future. It may also result in Mavin no longer being able to provide you with certain services.

## Response from Mavin

A request can be sent to [privacy@mavin.org](mailto:privacy@mavin.org). Mavin will comply with your request as soon as possible and in any case no later than one (1) month after Mavin has received such a request. If Mavin rejects your request, we will indicate in our reply why the request was rejected.

## Recipients of your personal data

Your data may be transmitted to:

- Data processors such as Google Analytics, Comentarismo and/or Hotjar

It is possible that Mavin is required to submit your data to a third party, for example, to fulfil a legal obligation. However, once we integrate private smart contracts, we will not have access to your personal data and, hence, we will never be able to comply with any request to provide your legal name to a government if you have published content incognito on associated decentralised platforms. In the case you published incognito on associated centralised platforms, it is up to that platform whether or not to reveal your identity.

## Transfer to third countries or international organisations

It may be necessary, for instance for technical and operational reasons, to transfer your (personal) data to affiliates of Mavin located outside the European Economic Area. Due to the possibility that the regulations in the area of privacy protection do not offer the same protection as within the European Economic Area, Mavin will aim to protect your privacy as much as possible. If that is not possible, Mavin will ask your consent to transfer your (personal) data to countries that do not maintain an adequate protection level. You may withdraw your consent at any time.

## What are cookies and how does Mavin use them?

Cookies are small pieces of (text) information that are sent to your browser when you visit the website of Mavin and then stored on the hard disk or in the memory of your device. The cookies placed via Mavin's website cannot damage your device or the files stored on it. With 'cookies', we also mean comparable techniques collecting information, such as device fingerprinting.

Some cookies are necessary to operate the website, but these do not collect any personal data. Other cookies we use for statistical purposes, which do not collect any personal data. We also can collect marketing cookies, which do collect personal data. You can determine whether you wish statistical or marketing cookies and at any time you can change your preference via [Mavin.com/cookies](https://mavin.com/cookies). Any changes that you make will be reflected automatically.

## Updates to this Privacy Policy

This Privacy Policy is subject to changes. We, therefore, advise you to regularly read the Privacy Policy for any such changes. We will post any required or desired amends to our privacy policy onto our blog and newsletter with a time stamp and versioning.

## Questions, remarks, and complaints

If you have any questions regarding this Privacy Policy or the way in which Mavin uses your data, you can send an e-mail to [privacy@mavin.org](mailto:privacy@mavin.org). If you have a complaint about the way your data is processed, please send an e-mail to [privacy@mavin.org](mailto:privacy@mavin.org). Furthermore, you always have the right to contact the competent national data protection authority. In The Netherlands, this is the [Autoriteit Persoonsgegevens](#).

This Privacy Policy has last been updated on July 7, 2020.