

Privacy Policy for Eden Investments

Effective Date: July 1, 2025

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1. Introduction

Eden Investments ("Eden," "we," "us," or "our") is committed to protecting your privacy. This Privacy Policy governs the collection, use, storage, and sharing of personal data through our website, <https://www.edeninvestments.xyz/>, hosted on Wix, and our user account portal, <https://rodger6640.softr.app/>, powered by Softr and potentially integrated with Airtable, as part of our pilot project in Sri Lanka ("Pilot Project"). The Pilot Project allows users to invest Rs. 1,000,000 or Rs. 500,000 (for select users), converted to USDT, invested for a 9% APY, and returned after 6 months. We comply with Sri Lanka's Personal Data Protection Act No. 9 of 2022 (PDPA) and the General Data Protection Regulation (GDPR) for EU users, ensuring transparency and security in handling your data.

2. Data We Collect

We collect the following types of data to facilitate your participation in the Pilot Project:

2.1 Personal Information

- Name, email address, phone number, and residential address.
- Know Your Customer (KYC) details, including passport, national ID, or other government-issued identification, to comply with Anti-Money Laundering (AML) regulations.

2.2 Financial Information

- Bank account details for deposits and withdrawals.
- Investment amounts (Rs. 1,000,000 or Rs. 500,000) and transaction history (e.g., LKR-to-USDT conversions, investment returns) stored and displayed on <https://rodger6640.softtr.app/>.

2.3 Usage Data

- IP address, browser type, device information, and website interactions (e.g., pages visited, time spent) collected by Wix on <https://www.edeninvestments.xyz/>.
- Access patterns and usage data collected by Softtr on <https://rodger6640.softtr.app/> and potentially Airtable for portal functionality.
- Cookies and similar technologies to track usage, with your consent (see Section 8).

3. How We Use Your Data

We use your data for the following purposes:

- **KYC/AML Compliance:** Verify your identity and comply with legal requirements.
- **Investment Processing:** Convert LKR to USDT, manage investments, and process withdrawals.
- **Account Management:** Update your user portal (<https://rodger6640.softtr.app/>) with investment status (balance, 9% APY, days to maturity) and send monthly statements.
- **Customer Support:** Respond to inquiries via email (info@edeninvestments.xyz) or phone (+94777127167).
- **Marketing and Updates:** Send project updates, educational content, and promotional offers via email or phone, with an option to opt-out.
- **Website Improvement:** Analyze usage data to enhance functionality on <https://www.edeninvestments.xyz/> and <https://rodger6640.softtr.app/>.
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4. Data Sharing and Disclosure

We share your data only as necessary and under strict confidentiality agreements:

- **Third-Party Exchange Platforms:** Share financial data with a secure third-party exchange platform to convert LKR to USDT and USDT to LKR, ensuring compliance with forex regulations.
- **Financial Partners:** Share data with vetted financial partners to manage investments, ensuring security and confidentiality.
- **Wix, Softr, and Airtable:** Wix collects usage data (e.g., IP addresses, cookies) as the website host (<https://www.edeninvestments.xyz/>), Softr collects access patterns for the user portal (<https://rodger6640.softr.app/>), and Airtable may process usage data for portal management. These platforms act as data processors under our direction, bound by their respective privacy policies.
- **Legal Requirements:** Disclose data to comply with Sri Lankan laws, court orders, or regulatory requests (e.g., Central Bank of Sri Lanka audits).
- **Service Providers:** Share with trusted providers (e.g., cloud storage, analytics) who assist in website and portal operations, bound by data protection agreements.

We do not sell or rent your personal data to third parties for marketing purposes.

5. Data Security and Storage

We implement robust measures to protect your data:

- **Encryption:** All data is encrypted using AES-256 encryption during transmission and storage.
- **Access Controls:** Data access is restricted to authorized personnel with two-factor authentication (2FA).
- **Security Audits:** Regular audits and vulnerability assessments to identify and mitigate risks.
- **Storage Location:** Data is stored on secure cloud servers (e.g., Google Cloud) in Singapore, a jurisdiction with strong data protection standards. Wix, Softr, and Airtable may process data in their respective locations (e.g., US for Airtable), subject to safeguards.
- **Backups:** Encrypted backups are maintained to ensure data integrity, with access logs monitored.

Despite these measures, no system is entirely secure. We are not liable for unauthorized access beyond our control but will notify you promptly of any breach per legal requirements.

6. Data Retention

- **Retention Period:** We retain your data for 5 years after the Pilot Project ends (December 31, 2025) or as required by Sri Lankan financial regulations (e.g., AML record-keeping).
- **Deletion:** After the retention period, data is securely deleted using industry-standard methods, unless further retention is legally required.

7. Your Rights

Under PDPA and GDPR, you have the following rights regarding your data:

- **Access:** Request a copy of your personal data via info@edeninvestments.xyz.
- **Correction:** Request correction of inaccurate or incomplete data.
- **Deletion:** Request deletion of your data after the Pilot Project, subject to legal obligations (e.g., AML records).
- **Restriction:** Request restriction of data processing in certain cases (e.g., while a correction request is pending).
- **Data Portability:** Request your data in a machine-readable format for transfer to another service.
- **Opt-Out:** Unsubscribe from marketing communications by clicking the "unsubscribe" link in emails or contacting us.
- **Consent Withdrawal:** Withdraw consent for data processing where applicable, though this may prevent participation in the Pilot Project.

To exercise these rights, email info@edeninvestments.xyz. We will respond within 30 days, as required by law. Requests involving data processed by Wix, Softr, or Airtable may require coordination with those platforms.

8. Cookies and Tracking

- **Cookies:** We use cookies on <https://www.edeninvestments.xyz/> (via Wix) and potentially <https://rodger6640.softr.app/> (via Softr/Airtable) to track usage, improve functionality, and personalize your experience (e.g., session management, analytics).
- **Consent:** A cookie consent banner on <https://www.edeninvestments.xyz/> allows you to accept or decline non-essential cookies (e.g., analytics, marketing). Essential cookies (e.g., for login) are always active. Softr and Airtable may deploy cookies for portal functionality, subject to this consent.
- **Third-Party Analytics:** We use tools like Google Analytics to collect anonymized usage data, with IP anonymization enabled, processed via Wix.

9. International Data Transfers

- **Transfer Mechanism:** Data is transferred to Singapore for storage on secure cloud servers, complying with GDPR's Standard Contractual Clauses (SCCs) and PDPA requirements for cross-border transfers. Wix, Softr, and Airtable may process data in the US (e.g., Airtable's servers), adhering to the Data Privacy Framework or equivalent safeguards.
- **Safeguards:** Transfers are encrypted, and third-party providers are bound by data protection agreements ensuring equivalent safeguards.

10. Children's Privacy

The Pilot Project is not intended for individuals under 18 years of age. We do not knowingly collect data from children. If you believe we have such data, contact us to have it deleted.

11. Compliance and Data Protection Officer

- **Compliance:** We comply with Sri Lanka's Personal Data Protection Act No. 9 of 2022 and GDPR for EU users.
- **Data Protection Officer (DPO):** Our DPO oversees compliance and can be reached at dpo@edeninvestments.xyz for privacy concerns or complaints.

12. Third-Party Links

<https://www.edeninvestments.xyz/> and <https://rodger6640.softr.app/> may contain links to third-party websites (e.g., exchange platforms). We are not responsible for their privacy practices. Review their policies before sharing data.

13. Changes to This Privacy Policy

We may update this Privacy Policy to reflect changes in our practices or legal requirements. Updates will be posted on <https://www.edeninvestments.xyz/>, with notice via email at least 7 days in advance. Continued use of the website or portal after changes constitutes acceptance of the revised policy.

14. Contact Information

For questions, concerns, or to exercise your rights, contact us at:

- **Email:** info@edeninvestments.xyz
- **Phone:** +94777127167
- **Website:** <https://www.edeninvestments.xyz/>
- **User Portal:** <https://rodger6640.softtr.app/>

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