

Effective Date: January 1, 2025

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Arcex Inc. Privacy Policy

Arcex, Inc. (“Arcex” or “we” or “us”) respects your privacy and is committed to protecting it. This Privacy Policy, together with all related/linked information, documents and the Terms of Use, describes the personal information we collect from you or that you may provide to us when you visit our website (“Arcex Website”), or which we otherwise gather in connection with services, products, and applications offered by Arcex (“Services”).

Key, non-exhaustive points about our information practices are summarized below, followed by comprehensive explanations of each subject.

- **Collection.** We may collect information about you, such as wallet ID information, commercial information, internet or other similar network activity, and details of any payment transactions you carry out through the Services. [See below to learn more.](#)
- **Use.** We use your information to provide our Services and process payments, to improve and expand our Services including developing new products and services, for marketing, and for market research. [See below to learn more.](#)
- **Sharing.** We share your information to provide you with the Services, to improve the quality, safety, and security of the Services, to comply with applicable law, to respond to your requests, and to allow recipients to use it for marketing or other purposes, subject to your consent where required. [See below to learn more.](#)
- **Data Security.** We use reasonable administrative, technical and physical security to protect the personal information we retain. [See below to learn more.](#)
- **Data Retention.** We retain your personal information for the period necessary to fulfill the purposes outlined in this Policy unless longer retention is required by law. [See below to learn more.](#)
- **Choices.** You have choices regarding how we use and share your information for marketing and other purposes. Certain choices and rights are dependent upon your location. [See below to learn more.](#)
- **Children’s Privacy.** We do not target or knowingly collect any information from children under the age of 13. [See below to learn more.](#)
- **Privacy Notice for EU and UK Residents.** If you are an EU or UK resident, you have additional rights regarding your control and access to the data we collect from you. [See below to learn more.](#)

- **Changes to Our Privacy Policy.** We will notify you of any material changes by posting the updated version of this Privacy Policy and, where changes are material, notifying you by your e-mail address on file with us. [See below to learn more.](#)
- **Contact Information and Challenging Compliance.** Please contact us at legal@arcex.app if you have any questions or concerns regarding our data handling practices. [See below to learn more.](#)

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

The information we collect depends on how you interact with us, the Services you utilize, and the choices you make. We collect information about you from different sources and in various ways.

Information You Provide to Us. Arcex collects information you provide directly to us through the Services, via email, or through your communications or interactions with us. This may include, but is not limited to, the following:

- **Identifying information**, such as your name, screen name, account identifier, wallet ID, or other information you choose to share with us.
- **Contact information**, such as your address, e-mail address, or telephone numbers if you choose to share them with us.
- **Preferences**, such as your preferences for communication, language, and time zone.
- **Security**, such as passwords, security questions, usernames, or any other information you choose to provide to us when you create an account with us.

Information from Other Sources. Arcex may receive information about you if you use any other websites affiliated with Arcex or from information you post on or submit in connection with the Services. Arcex may also receive your information from third party marketing companies that we use to provide you with information concerning our Services and other information.

Information We Collect through Automatic Data Collection Technologies.

As you navigate through and interact with the Arcex Website, we may use automatic data collection technologies to collect certain information, including:

- **Information Collected Using Cookies.** Cookies are data files created when you visit a website and those files are stored locally (on your device). When visiting the Arcex Website, we may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to make your experience on the Arcex Website more personal and interactive. Information collected may include websites you visited before browsing the Arcex Website, pages you viewed on the Arcex Website, number of times you accessed the Arcex Website, how long you spent on the Arcex Website, and other web traffic data. You may be able to disable the

use of Cookies (or disallow the use of Cookies on specific websites) by adjusting your web browser settings.

- **Information Collected Using Web Analytics Tools.** We may use Google Analytics Advertising features such as demographics and interest reporting to collect data about the gender, age, and interests of visitors to the Arcex Website. You can read Google’s security and privacy policies for Google Analytics at policies.google.com/technologies/partner-sites. You may opt out of having your data used by Google Analytics by accessing Google’s Ads Settings, Ad Settings for mobile apps, or any other available means.

You can prevent the storage of Cookies by setting your browser software accordingly.

Disclosure of Other Data. The type and/or methodology of data collection may change from time to time. Any such changes that apply to your information is reflected in the “[Information We Collect about You and How We Collect It](#)” section of this Privacy Policy.

OUR USE OF YOUR PERSONAL INFORMATION

We use the information we collect in the following ways:

- **To Provide Services.** We use collected information to facilitate the use and purchase of our Services, including facilitating transactions, billing and invoicing where relevant.
- **To Send You Promotional Materials.** We use your information to fulfill your requests, including, but not limited to, requests to receive promotional materials. Promotional materials may include newsletters or other information regarding Arcex Services. We also use your information to share other services or products that may be of interest to you. Promotional materials may be conveyed in emails. If you no longer wish to receive these materials, you may opt out by following the opt-out instructions included in our correspondence or by contacting us at legal@arcex.app.
- **To Improve Our Services.** We collect information using cookies (data files created when you visit a website) and/or analytic tools. We use this information to personalize your experience on the Arcex Website or with Arcex and/or to improve the security, design, and/or function of the Arcex Website. We may also use your information to improve, support, and develop our Services.
- **To Fulfill or Meet the Reason you Provided the Information.** For example, if you share your name and contact information to request information or ask a question about our Services, we will use that information to respond to your inquiry. We may also save and use your information to market or promote our Services.
- **To Provide Customer Support.** We may use your information internally to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.

- **To Maintain Safety and Security.** We may use your information internally to help maintain the safety, security, and integrity of our Services, databases and other technology assets, and business.
- **To Further Product Development.** We may use your information for testing, research, analysis, and product development to allow us to develop and improve our Services.
- **To Comply with Our Legal Obligations.** We may use your information if we are required to respond to a law enforcement request and as required by applicable law, court order, or governmental regulations.
- **Other uses:**
 - To present our Services and its content to you.
 - To carry out our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection.
 - To notify you about changes to our Services.
 - As described to you separately when collecting your personal information.

OUR SHARING OF YOUR PERSONAL INFORMATION

We share personal information with your consent, when you direct us to share it with others, or as necessary to complete your transactions or provide the Services you have requested or authorized.

We may share your information with the following parties:

- **Our Partners.** With Software/IT, cloud service providers, consultants, financial, legal and other similar providers we use to support our business, for the purpose of supporting our business.
- **With Other Third Parties.** We may share your information when legally required to do so, such as at the request of governmental authorities conducting an investigation or to verify or enforce compliance with policies governing the Arcex Website and applicable laws. In addition, we may disclose user information if we believe disclosure is necessary to protect the rights, property or safety of Arcex, or any of our respective affiliates, business partners, customers or others.
- **Corporate Transactions.** In connection with, during, or upon completion of a merger, acquisition, asset sale, or other business transaction that involves some, or all, of Arcex's assets, data you have provided to Arcex may be transferred to a successor/purchaser as part of a transaction.

We may share de-identified information in accordance with applicable law without restriction with third parties for advertising, promotional, or other marketing purposes.

DATA SECURITY

We use reasonable administrative, technical and physical security to protect any personal information we receive and retain and to help ensure that it is used in accordance with this Privacy Policy. Should you have further questions or concerns about our security measures, please contact us using the information below.

DATA RETENTION

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless longer retention is required by law or for auditing purposes. Where you choose to place information, including but not limited to personal information, on a blockchain transaction, such information becomes part of a public record and thereafter we have no technical means to remove or obscure such information.

CHOICE AND CONTROL OF YOUR PERSONAL INFORMATION

You can control how your information is used in the following ways below in accordance with applicable law:

Updating your Personal Information You request to change any personal information of yours that we maintain by contacting legal@arcex.app.

Opting Out of Communications. Our promotional materials include instructions for opting out of receiving further communications. If you no longer wish to receive promotional emails, you may opt out by contacting us with your request at legal@arcex.app. Please note that even if you opt out of receiving marketing communications, we may still communicate with you regarding an established business relationship, if one has been established. Please allow a reasonable time after reaching out for us to process your request.

Opting Out of Analytics Tools. You may opt out of having your data used by Google Analytics via Google's Ads Settings, Ad Settings for mobile apps, or any other available means. Please visit policies.google.com/technologies/partner-sites for more information on how to do this.

Adjusting Cookie Settings. Most browsers accept Cookies until you change your browser settings. If you do not wish for the Arcex Website to collect your information using Cookies, you can typically disable the use of Cookies (or disallow the use of Cookies on specific websites) by changing your browser settings. However, if you remove or reject Cookies, it could affect how the Arcex Website works for you.

California Do Not Track Disclosure.

Do Not Track (“DNT”) is a privacy preference that you can set in your web browsers, which allows you to opt out of tracking by websites and online services. We do not currently recognize or respond to DNT signals. For more information about DNT, please see www.eff.org/issues/do-not-track.

Nevada Opt Out Right.

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth below.

CHILDREN UNDER THE AGE OF 13

Our Services are not designed or intended to collect information from children under the age of 13. Arcex does not knowingly collect or maintain any information from children under the age of 13.

CROSS-BORDER TRANSFERS

Arcex is based in the United States; however, information collected about you may be collected, stored and processed in other locations outside of the United States. When we transfer and process information about you, we will process and protect it as described in this Privacy Policy. By using the Services, you consent to the transfer of information to countries outside of your country of residence which may provide for different data protection rules than in your country.

PRIVACY NOTICE FOR EU AND UK RESIDENTS

If you are an EU or UK resident, under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include the following:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of any personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of any personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove any of your personal data where there is no good reason for us continuing to process it, to the extent that it is technically feasible for us to do so. You also have the right to ask us to delete or remove any of your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific technical and/or legal reasons which will be notified to you, if applicable, following our verification of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes, however, please note that we do not process personal data for these purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, any of your personal data we may hold in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at legal@arcex.app.

1. No fee usually required.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

2. What we may need from you.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

3. Time limit to respond.

We try to respond to all legitimate requests within 30 days. Occasionally it could take us longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

4. Data Protection Authority.

If you are unsatisfied with our response to any issues that you raise with us regarding our collection, use, or retention of your personal information, you may have the right to make a complaint with the data protection authority in your jurisdiction by contacting the data protection authority.

CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our Privacy Policy on the Arcex Website. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified in your account or through a notice on the Arcex Website home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting the Arcex Website and this Privacy Policy to check for any changes. **Your continued use of the Arcex Website or our Services following the posting of changes constitutes your acceptance of such changes.**

CONTACT INFORMATION AND CHALLENGING COMPLIANCE

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. If you have questions regarding this Privacy Policy or our data privacy practices, or if you believe we may have violated applicable law, please contact us at legal@arcex.app.