MONAVATE US, INC.
PRIVACY POLICY

Last Reviewed and Updated: September 16, 2026

California Notice at Collection/State Law Privacy Rights: See the State Privacy Rights Notice section below for important information about your rights under applicable state privacy laws.

Monavate US, Inc. and its affiliates and parent organization (collectively, **"Monavate onChain," "we," "our,"** and/or **"us"**), values the privacy of individuals who use our websites (including www.monavateonchain.com (the **"Site"**)), applications, or services, including software that is downloadable from the Site, and any services that link to this Privacy Policy (collectively, our **"Services"**). This privacy policy (the **"Privacy Policy"**) explains how we collect, use, and disclose Personal Data from users of our Services. For the purposes of this Privacy Policy, **"Personal Data"** means information that relates to an identified or identifiable natural person.

Notice to Users Outside the United States: Please see the Notice to Users Outside of the United States section below for additional information for individuals residing in jurisdictions outside of the United States with comprehensive data protection or data privacy laws, including United Kingdom, Switzerland and the European Economic Area.
By using our Services, you agree to the collection, use, and disclosure of your Personal Data as described in this Privacy Policy. Beyond this Privacy Policy, your use of our Services is also subject to our Terms and Conditions.

Certain third-parties, including API providers or financial institutions, may require you to provide them with Personal Data directly in order to use their services through their integration with the Monavate onChain Services.

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INFORMATION WE COLLECT

Monavate onChain aims to collect as little Personal Data from users as possible when using our Services. However, we may need to collect certain Personal Data from or about you or your devices from various sources in order to provide you with full access to the Services, as described below.

Information You Provide to Us Through the Site. When you contact us, sign up for the Services, sign up to receive any correspondence (like a newsletter or marketing communications), customer service, or participate in certain beta programs and new/trial services, we collect any Personal Data you provide to us, such as your name, email address, and country of residence.

For certain Monavate onChain card services, including those offered by our third-party partners, or other requested services we may collect the Personal Data necessary in order to permit you access to the relevant features and Services, including:

- **Contact data,** such as your first and last name, email address, and phone number.
- **Verification data** (e.g. identity verification) used in conjunction with Contact Data for compliance with Know Your Customer, Anti-Money Laundering, OFAC, and similar compliance obligations, such as a photo ID and video for verification purposes.
- **Transactions data**, that is, the amounts, currencies, and destination wallet address(es) or recipient information.
- **Communications data** based on our exchanges with you, including when you contact us for customer support, communicate with us via chat features, social media, or otherwise, which may include your social media username.
- **User-generated content data**, such as any communications you send to other users through the Monavate onChain Services, if any.

Information We Collect Automatically Through the Site. We may automatically collect information about you and your devices when you use our Site. For example, when you visit our Site, we collect your internet protocol (IP) address, web browser type, web browser language, operating system type, the website you visited before browsing to our Site, a pseudonymous User ID that is unique to Monavate onChain for Monavate onChain's internal use in improving its products and services, the pages you view, the length of time you spend on a page, the dates and times of your visits, the hyperlinks you click on, and other information about your use of our Site. When performing an exchange through a third-party API provider, we log information such as the wallet addresses and the transaction IDs involved.

Service Interaction Data. We may automatically collect data corresponding to your interactions with our Services, such as event data and software feature usage and analytics data, which we use for security purposes, to verify the functionality of features in the Services, and to improve our Services.

Cookies. We and the third-party API providers may collect information through our Services using cookies, pixel tags, or similar technologies. Our third-party partners, such as analytics or advertising partners, may use these technologies to collect information about your online activities over time and across different websites. Cookies are small text files containing a string of alphanumeric characters. A pixel tag is a single pixel, transparent GIF image with a unique identifier that can recognize certain types of data on your device (similar to how cookies do). When we refer to "cookies" in the remainder of this Privacy Policy, such reference includes cookies, pixel tags, or similar technologies deployed on our Site.

We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Site.

Our Services use the following types of cookies for the purposes described below:

- **Functional Cookies.** We use functional cookies to recognize you when you return to our Site.
- **Analytics and Performance Cookies.** We use analytics and performance cookies for website analytics purposes to operate, maintain, and improve the Site. We also use analytics cookies for attribution purposes to understand how you learned of the Services. The information gathered by these cookies is aggregated and anonymized and does not identify any specific individual visitor. We use Google Analytics to collect and process certain analytics data on our behalf. Google Analytics uses its own cookies that help us understand how you engage with the Site and may also collect information about your use of other websites, apps, and online resources. The links below provide additional information and resources for Google Analytics:
    - Google Analytics
    - Prevent the Use of Google Analytics in connection with your use of our Services
- **Advertising Cookies.** We may allow third-party advertising partners to use cookies on the Site to collect information about your browsing activities over time and across websites. For example, our advertising partners, which may include Meta, TikTok and X (formerly known as Twitter), may deploy pixel tags on our Site for interest-based advertising purposes. Using the Meta, TikTok and X pixel tags, we (and Meta, TikTok, and X on our behalf) may collect information about you such as your visits to the Site, webpages viewed, clicks, form submissions, downloads, sign-ups and other browsing activities. We use this information to understand the effectiveness of, and improve, our interest-based advertising campaigns, and for the other applicable purposes detailed in this Privacy Policy. The links below provide additional information and resources regarding interest-based advertising facilitated by Meta, TikTok, and X:
    - Meta
    - TikTok
    - X

Further information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org.

You can block cookies by setting your internet browser to block some or all of the cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site. You can change your browser settings to block or notify you when you receive a cookie, delete cookies or browse our Site using your browser's anonymous usage setting. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings. If you do not agree to our use of cookies or similar technologies which store information on your device, you should change your browser settings accordingly. You should understand that some features of our Site may not function properly if you do not accept cookies or these technologies. Where required by applicable law, you will be asked to consent to certain cookies and similar technologies before we use or install them on your computer or other device.

Information We Collect from Other Sources. We may receive Personal Data about you from third parties, such as data, service, or marketing partners, or we may collect public blockchain data that can be tied to crypto wallets. We may combine this data with other Personal Data we have about you and otherwise use it as described in this Privacy Policy.

Other data not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

HOW WE USE THE PERSONAL DATA WE COLLECT

We use the Personal Data we collect for the following purposes:

- To establish an account, or access the Services.
- To provide, maintain, debug, improve, and enhance our Services.
- To understand and analyze how you use our Services and develop new products, services, features, and functionality.
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, provide you with communications, respond to comments and questions, and otherwise provide customer support.
- For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable, or otherwise of interest to you.
- To personalize your experience on our Site such as identifying you as a repeat visitor.
- To facilitate the connection of third-party services or applications.
- To create pseudonymous, de-identified and/or aggregated data to improve for our business processes, including to improve our Services.
- To find and prevent fraud, detect security incidents, and respond to trust and safety issues that may arise.
- For compliance purposes, including complying with Know Your Customer requirements for the Services, enforcing our Terms and Conditions or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- To contract with third-party partners providing aspects of the Services, including providing customer service, verifying customer information, providing advertising or marketing services, providing analytic services or providing similar services on behalf of the business or service provider.

- For other purposes for which we provide specific notice at the time the Personal Data is collected.

HOW WE SHARE THE PERSONAL DATA WE COLLECT

We do not share or otherwise disclose Personal Data we collect from or about you except as described below or otherwise disclosed to you at the time of collection.

- **Affiliates.** We may share any information we receive with our affiliates and subsidiaries for any of the purposes described in this Privacy Policy.
- **Advertising Partners.** We may share your Personal Data with third-party advertising companies for the interest-based advertising purposes described above.
- **Authorities and Others.** We may disclose your Personal Data to law enforcement, government authorities, and private parties if we believe doing so is required or appropriate to: (i) comply with applicable laws; (ii) respond to law enforcement requests and legal process, such as a court order or subpoena; or (iii) protect the rights, property, and safety of Monavate onChain, our employees, agents, customers, and others, including to enforce our agreements, policies, and Terms and Conditions.
- **Business Transferees.** We may transfer your Personal Data to service providers, advisors, potential third-party partners and service providers, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company, or we sell, liquidate, or transfer all or a portion of our assets.
- **Partners.** We may share your Personal Data with third parties with whom we partner to provide the Services, as well as social media platforms, parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or to carry out other related activities that allow our Services to interact with services our partners provide.
- **Professional Advisors.** We may share your Personal Data with professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.
- **Vendors and Service Providers.** We may share your Personal Data with third parties that provide services on our behalf, such as hosting, information technology, customer support, email delivery, marketing, research and analytics, for know your customer identity verification for the Services, to allow us to operate the Services or our business, or other services offered as necessary to comply with applicable governing laws and regulations.
- **Third Parties Designated by You.** In addition to transactions being visible on the public blockchain, we also may disclose your Personal Data with third parties where you have instructed us or provided your consent to do so.

INTERNATIONAL DATA TRANSFERS

Your information, including the Personal Data that you provide to us, may be transferred to, stored at and processed by us outside the country in which you reside, including, but not limited to the

United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By providing any information, including Personal Data, on our Site, you consent to such transfer, storage, and processing. We may also transfer Personal Data from the European Economic Area or the United Kingdom to the United States, as needed, to perform the Services that you have requested from us. We will take steps that we believe to be reasonably necessary to treat your Personal Data securely and in accordance with this Policy.

SECURITY

We employ organizational, technical, and administrative measures designed to protect Personal Data within our organization and with our affiliates and parent entities. However, as no electronic transmission or storage of Personal Data can be entirely secure, we can make no guarantees as to the security or privacy of your Personal Data. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us via the "Contact Information" section below.

RETENTION

We will only retain your Personal Data as long as reasonably required for the purposes for which we collected it. In the context of customer support, we retain information sufficient to connect subsequent requests from the same user in order to provide efficient service, unless a longer retention period is required or permitted by law (for example for regulatory purposes).

THIRD-PARTIES

Our Services may contain links or API connections to other websites, products, or services that we do not own or operate. We are not responsible for the privacy and advertising practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party API providers or any Personal Data you disclose to these third parties. We encourage you to read their privacy policies before providing any Personal Data to them.

DO NOT TRACK SIGNALS

Some Internet browsers may be configured to send "Do Not Track" signals to the online sites that you visit. We currently do not respond to "Do Not Track" signals. To find out more about "Do Not Track," please visit www.allaboutdnt.com

CHILDREN

Our Services are not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us as provided. If we learn that we have collected personal information through the Services from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

YOUR RIGHTS AND CHOICES

In this section, we describe the rights and choices available to all users. Users who are located in certain U.S. states, and Europe can find additional information about their rights below.
Opt-out of Marketing Communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Advertising choices. You may be able to limit use of your Personal Data for interest-based advertising through the following settings/options/tools:

- **Browser settings.** Changing your internet web browser settings to block third-party cookies.
- **Privacy browsers/plug-ins.** Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
- **Platform settings.** Certain platforms offer opt-out features that let you opt-out of use of your information for interest-based advertising. For example, the following platforms provide details about how users can exercise their choice to opt-out of interest-based advertising as follows:
    - Google: https://adssettings.google.com
    - Meta: https://www.facebook.com/help/769828729705201?ref=cookies
    - TikTok: https://www.tiktok.com/privacy/ads-and-your-data/en
    - X: https://help.x.com/en/safety-and-security/privacy-controls-for-tailored-ads
- **Ad industry tools.** Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
    - Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp
    - Digital Advertising Alliance: optout.aboutads.info.
    - AppChoices mobile app, available at https://www.youradchoices.com/appchoices, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- **Mobile settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes.

We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

Declining to provide information. We need to collect Personal Data to provide the Services to you. For example, if you do not provide the information necessary for us or our third-party service providers to meet the necessary compliance obligations related to the applicable know-your-customer requirements, you will be unable to access the Services.

CONTACT INFORMATION

We welcome your comments or questions regarding our privacy practices. If you have questions about your privacy related to the Services or this Privacy Policy, you may contact us at:

Mail:	Monavate US, Inc. 8 The Green, Ste A, Dover, Delaware, 19901
Email:	info@monavateonchain.com

CHANGES TO THIS PRIVACY POLICY

We will post any updates to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we process Personal Data previously collected from you through our Services, we will notify you by email or other means.

STATE PRIVACY RIGHTS NOTICE

Except as otherwise provided, this section applies to residents of California, Colorado, Connecticut, Utah, Virginia and other states to the extent they have privacy laws applicable to us that grant their residents the rights described below (collectively, the **"State Privacy Laws"**).

This section describes how we collect, use, and share Personal Information (defined below) of residents of these states and the rights these users may have with respect to their Personal Information. Please note that not all rights listed below may be afforded to all users and that if you are not a resident of one of these states listed above, you may not be able to exercise these rights. In addition, **we may not be able to process your request if you do not provide us with sufficient detail to allow us to confirm your identity or understand and respond to it.**

For the purposes of this Section, **Personal Information** has the meaning given to "personal data", "personal information" or other similar terms, and "Sensitive Personal Information" has the meaning given to "sensitive personal information," "sensitive data", or other similar terms in the State Privacy Laws, except that in neither case does such term include information exempted from the scope of the State Privacy Laws. In some cases, we may provide a different privacy notice to

certain categories of residents of these states, such as job applicants, in which case that notice will apply instead of this section.

Personal Information does not include information that is:

- Lawfully made available from government records.
- Deidentified or aggregated.
- Otherwise excluded from the scope of the State Privacy Laws.

Your State Law Privacy Rights

State Privacy Laws may provide residents with some or all of the following rights. However, these rights are not absolute, and some State Privacy Laws do not provide these rights to their residents. Therefore, we may decline your request in certain cases as permitted by law.

Right to Know and Access. You may submit a verifiable request for information about how we have collected and use your Personal Information during the past 12 months: (i) categories of Personal Information collected; (ii) business or commercial purposes for which categories of Personal Information are collected or sold by us; (iii) categories of sources from which we collect Personal Information; (iv) categories of third parties with whom we share Personal Information; (v) the categories of Personal Information disclosed or sold for a business purpose; and (vi) of the categories of third parties to whom the Personal Information was disclosed or sold for a business purpose. You can also request a copy of the Personal Information that we have collected about you.

Right to Appeal. You can appeal our denial of any request validly submitted.

Right to Correction. You can ask us to correct inaccurate Personal Information that we have collected about you.

Right to Deletion. Subject to certain exceptions, you may submit a verifiable request that we delete Personal Information about you that we have collected from you.

Right to Opt-Out. In some circumstances, you may have opt-out rights with respect to your Personal Information:

- **Opt-out of certain processing for targeted advertising purposes.** You can opt-out of certain processing of personal information for targeted advertising purposes.
- **Opt-out of profiling/automated decision making.** You can opt-out of automated processing or profiling performed on personal information to evaluate, analyze, or predict personal aspects related to a person's economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.
- **Opt-out of other sales of personal data.** You can opt-out of other sales of your Personal Information.

Nondiscrimination. You have the right not to receive discriminatory treatment for the exercise of your privacy rights, subject to certain limitations.

Revoke consent. You may have the right to revoke your consent to our processing of your Personal Information.

Consumers under 16. We do not have actual knowledge that we sell or share the personal information of consumers under 16 years of age.

Sensitive Personal Information. We do not process Sensitive Personal Information for the purpose of inferring characteristics about consumers under the California Consumer Privacy Act (**"CCPA"**).

Shine the Light. We do not rent, sell, or share Personal Information with non-affiliated companies for their direct marketing uses as contemplated by California's "Shine the Light" law (Civil Code § 1798.83), unless we have your permission.

Submit Requests to Exercise Your Right to Know/Access, Appeal, Correction, or

Deletion. To submit requests to exercise your right to know/access, appeal, correction, or deletion, please email us via our Contact Information section.

Submit Requests to Exercise Your Right to Opt-out of the "Sale" or "Sharing" of Your Personal Information. While we do not sell Personal Information for money, like many companies, we use services that help deliver interest-based ads to you as described above. The State Privacy Laws may classify our use of some of these services as "selling" or "sharing" your Personal Information with the advertising partners that provide the services. You can submit requests to opt-out of tracking for targeted advertising purposes or other sales of Personal Information by emailing us via the Contact Information section.

Verification of Identity; Authorizing an Agent. We may not be able to process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. We may need to verify your identity to process your know/access, appeal, correction, or deletion requests and we reserve the right to confirm your residency. To verify your identity, we may require government identification, a declaration under penalty of perjury, or other information, where permitted by law.

Under some State Privacy Laws, you may be permitted to authorize an agent to make a request on your behalf. However, we may need to verify your authorized agent's identity and authority to act on your behalf. We may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you or your agent to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your privacy rights on your behalf, providing the information we request to verify your identity, or providing us with confirmation that you have given the authorized agent permission to submit the request.

Additional information.

- **Sensitive personal information.** We do not use or disclose sensitive personal information, including for purposes that California residents have a right to limit under the California Consumer Privacy Act, as amended ("**CCPA**").
- **Retention**. We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.
- **Deidentification.** We do not attempt to reidentify deidentified information derived from personal information, except for the purpose of testing whether our deidentification processes comply with applicable law.
- **Profiling.** We do not engage in profiling, as defined by applicable state privacy laws, in furtherance of decisions that produce legal or similarly significant effects.

Personal information that we collect, use and disclose. We have summarized the Personal Information we collect and may disclose to third parties by reference below to both the categories defined in the "Information We Collect" section of this Policy above and the categories of Personal Information specified in the CCPA (Cal. Civ. Code §1798.140) and the below describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Personal Information ("PI") we collect	**CCPA statutory category**	**Categories of third parties to whom we "disclose" PI for a business purpose**	**Categories of third parties to whom we "sell" or "share" PI**
• *Information You Provide to Us (**Site only**)*	• *Identifiers* • *Commercial information* • *California customer records*	• *Affiliates* • *Advertising partners* • *Authorities and others* • *Business transferees* • *Partners* • *Professional advisors*	• *Advertising partners (to facilitate online advertising)*

Personal Information ("PI") we collect	**CCPA statutory category**	**Categories of third parties to whom we "disclose" PI for a business purpose**	**Categories of third parties to whom we "sell" or "share" PI**
		• *Vendors and Service providers* • *Third parties designated by you*	
• *Information We Collect Automatically (**Site only**)*	• *Identifiers* • *Online Identifiers* • *Commercial information* • *Internet or Network Information*	• *Affiliates* • *Advertising partners* • *Authorities and others* • *Business transferees* • *Partners* • *Professional advisors* • *Vendors and Service providers* • *Third parties designated by you*	• *Advertising partners (to facilitate online advertising)*
• *Service Interaction Data*	• *Identifiers* • *Online Identifiers* • *Commercial information* • *Internet or Network Information*	• *Affiliates* • *Third parties designated by you* • *Professional advisors* • *Authorities and others* • *Business transferees*	• *Advertising partners (to facilitate online advertising)*
• *Information We Collect from Other Sources*	• *Identifiers* • *Online Identifiers* • *Commercial information* • *Internet or Network Information*	• *Affiliates* • *Third parties designated by you* • *Professional advisors* • *Authorities and others*	• *Advertising partners (to facilitate online advertising)*

Personal Information ("PI") we collect	CCPA statutory category	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
		• *Business transferees*	

NOTICE TO USERS OUTSIDE OF THE UNITED STATES

GENERAL

Where this Notice to Users Outside of the United States applies. The information provided in this "Notice to Users Outside of the United States" section applies only to residents of those jurisdictions outside of the United States with comprehensive data protection or data privacy laws, including United Kingdom, Switzerland and the European Economic Area (collectively, "Europe"), to the extent the laws of that jurisdiction are applicable to us and grant their residents the rights described below.

Personal information. References to "Personal Information" in this Privacy Policy should be understood to include a reference to "personal data" (as defined in the GDPR) – i.e., information about individuals from which they are either directly identified or can be identified.

Special Categories of Personal Data. References to "special categories of personal data" in this European section of this Privacy Policy should be understood to mean special categories of personal data as defined in the GDPR – i.e. personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purposes of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Controller. Monavate onChain is the controller in respect of the processing of your personal information covered by this Privacy Policy. See the 'Contact Information' section above for our contact details.

OUR LEGAL BASES FOR PROCESSING

In respect of each of the purposes for which we use your personal information, data protection laws in certain jurisdictions, including Europe, require us to ensure that we have a "legal basis" for that use.
Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to perform a contract, we are about to enter into or have entered into with you (**"Contractual Necessity"**).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (**"Legitimate Interests"**). More detail about the specific

legitimate interests pursued in respect of each Purpose we use your personal information for is set out in the table below.
- Where we need to comply with a legal or regulatory obligation (**"Compliance with Law"**).
- Where we have your specific consent to carry out the processing for the Purpose in question (**"Consent"**).

We have set out below, in a table format, the legal bases we rely on in respect of the relevant purposes for which we use your personal information – for more information on these Purposes and the data types involved, see 'How We Use The Personal Data We Collect' above. Note that, for those jurisdictions in which consent is the only legal basis available, we rely on consent for the processing of Personal Data pursuant to this Privacy Policy.

Purpose	**Categories of personal information involved**	**Legal basis**
Service delivery, analytics, and operations (incl. service enhancement, personalization, and improvement)	• Any and all data types described in the 'Information We Collect' section above as relevant in the circumstances	• Compliance with Law, if we are legally obliged to respond to your request. • Consent, in respect to any special categories of personal data we may be processing or optional cookies we may use. • Legitimate Interest, in all other cases – our legitimate interests to develop, improve and communicate about our organization.
Marketing	• Any and all data types described in the 'Information We Collect' section above as relevant in the circumstances	• Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organisation and sending marketing communications for that purpose. • Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.
To facilitate connections and engagements with third-party services or applications (incl.	• Any and all data types described in the 'Information We Collect' section above as relevant in the circumstances	• Legitimate Interests – we have a legitimate interest in promoting these promotions and contests, including associated publicising of our business and operations.

Purpose	Categories of personal information involved	Legal basis
third-party API providers)		• Consent – in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given promotional communications.
Compliance and protection	• Any and all data types described in the 'Information We Collect' section above as relevant in the circumstances	• Compliance with Law. • Legitimate interest. Where Compliance with Law is not applicable, we and any relevant third parties have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety.
To create pseudonymous, aggregated, de-identified and/or anonymized data	• Any and all data types described in the 'Information We Collect' section above as relevant in the circumstances	• Legitimate interest. We have legitimate interest in understanding what may be of interest to our customers, improving customer relationships and experiences, delivering relevant content to our customers, measuring and understanding the effectiveness of the content we serve to our customers.
Further uses	• Any and all data types described in the 'Information We Collect' section above as relevant in the circumstances	• The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the Personal Information was collected. • Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.

RETENTION

We retain personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for Compliance and protection purposes.
To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information, we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

OTHER INFO

No Automated Decision-Making and Profiling. As part of the Services, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects.

YOUR RIGHTS

General. Your jurisdiction's data protection laws may give you certain rights regarding your Personal Data, which may include one or more of the rights below. To the extent such rights are applicable, we will comply with your requests to exercise such rights in accordance with applicable law. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no good reason for us continuing to process it - you also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Portability.** Port a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information, for example if you want us to establish its accuracy or the reason for processing it.
- **Object.** Object to our processing of your personal information where we are relying on Legitimate Interests – you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time.

Exercising These Rights. You may submit these requests by email to info@monavateonchain.com or our postal address provided above. We may request specific information from you to help us confirm your identity, your jurisdiction of residence, and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information and the applicable law in your jurisdiction), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions.

Your Right to Lodge a Complaint with your Supervisory Authority. In addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your jurisdiction of residence.

- For users in the European Economic Area – the contact information for the data protection regulator in your place of residence can be found here: https://edpb.europa.eu/about-edpb/board/members_en

- For users in the UK – the contact information for the UK data protection regulator is below:
  The Information Commissioner's Office
  Water Lane, Wycliffe House
  Wilmslow - Cheshire SK9 5AF
  Tel. +44 303 123 1113
  Website: https://ico.org.uk/make-a-complaint/

- For users in Switzerland – the contact information for the Swiss data protection regulator is below:
  Federal Data Protection and Information Commissioner
  Feldeggweg 1
  CH – 3003 Bern
  Switzerland
  Tel. +41 058 462 43 95
  Website: https://www.edoeb.admin.ch/edoeb/en/home/meldeportale.html

DATA PROCESSING LOCATIONS

We are a U.S.-based company and many of our service providers, advisers, partners or other recipients of data are also based in the U.S. This means that, if you use the Service, your personal information will necessarily be accessed and processed in the U.S. It may also be provided to recipients in other countries outside of your jurisdiction of residence, including jurisdictions that may not provide an equivalent level of protection for Personal Data to your home jurisdiction. By engaging with the Services, you understand and, to the extent required under applicable law, consent to the transfer of your Personal Data to the U.S. and other jurisdictions.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of your jurisdiction and you may have the right to

receive a copy of the appropriate safeguards under which your personal information is transferred by contacting us at info@monavateonchain.com.