PRIVACY & COOKIE POLICY

Last updated: _____

INTRODUCTION

At **Scopium** and **Scopium Exchange** ("Scopium", "we", "our", or "us"), we are committed to protecting your privacy and ensuring that your personal data is handled responsibly, transparently, and in accordance with applicable data protection laws.

This Privacy & Cookie Policy ("Policy") explains how we collect, use, disclose, and safeguard your personal information when you interact with our services through *scopium.com*, *scopium.io*, or any affiliated platform that offers token trading, token creation, or livestreaming functionality (collectively, the "Platform").

We process personal data in accordance with the principles established under the **EU General Data Protection Regulation (GDPR)**, **UK GDPR**, **Data Protection Act 2018**, and other applicable data privacy laws.

This Policy applies to all users of the Platform, including traders, visitors, registered users, creators/streamers, and any third-party integrators. By using our services, you consent to the practices described herein. If you do not agree with any part of this Policy, you must not access or use the Platform.

SECTION 1: DATA WE COLLECT

We collect and process several categories of personal data to provide, operate, and improve the services offered through the Scopium platform. The nature and scope of data collected depend on

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your level of interaction with the Platform — whether as a general visitor, verified trader, or registered content creator.

1.1 Account Registration Data

When you create an account on Scopium or interact with platform features, we may collect:

- **Email address** (required for account management and communications)
- **Phone number** (if provided voluntarily or required during enhanced verification)
- **Username and account preferences**
- **Wallet addresses** connected to your user profile

This information is necessary to establish your account, authenticate access, provide support, and comply with our platform terms.

1.2 Know Your Customer (KYC) Data

For users who apply to stream content or receive donations, full identity verification is required. During this process, we may collect the following KYC-related data through third-party verification providers:

- **Government-issued ID documents** (passport, national ID, driver's license)
- **Facial selfie or video capture** (for identity match)
- **Proof of address** (e.g., utility bill, bank statement)
- **Date of birth and country of residence**
- **Verification metadata** (e.g., submission timestamp, device fingerprint)

This information is processed strictly for the purposes of legal compliance, fraud prevention, and eligibility verification for revenue-generating features (streaming and donations).

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1.3 Blockchain Data

We do not actively monitor or store private keys, wallet seed phrases, or on-chain transactions. However, for performance and security purposes, we may:

- Passively associate wallet addresses with platform accounts
- View publicly available blockchain data (e.g., on Solscan) related to token creation, trade volume, or donation flows
- Log transaction hashes relevant to actions initiated via the Platform

All on-chain data is public by nature, but we do not reprocess or combine it with off-chain user profiles except where necessary to resolve fraud or abuse.

1.4 Technical & Device Information

When you access the Platform, whether through browser or mobile device, we automatically collect certain technical data to ensure service functionality, compliance, and abuse prevention. This includes:

- **IP address**
- **Device type and operating system**
- **Browser information**
- **Access times and session duration**
- **Device and browser fingerprinting data**
- **Geolocation estimation (country-level)**

Use of VPNs, proxy services, or anonymizing tools is **not permitted**, particularly for users accessing monetized features. We may restrict or suspend accounts that attempt to circumvent location-based controls or monitoring mechanisms.

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1.5 Cookie & Tracking Technologies

We use various types of cookies and similar technologies to:

- Enable core functionality (e.g., session persistence, authentication)
- Analyze user behavior for platform improvement
- Personalize user experience (e.g., language preferences)
- Serve limited marketing communications (where permitted)

More information is available in **Section 6: Cookies and Tracking** of this Policy.

1.6 Communication Data

If you contact us via email or support channels, or if you report a user or dispute a transaction, we may collect:

- **Your contact information**
- **Your message or complaint content**
- **Related metadata (timestamps, attachments)**
- **Support or enforcement history tied to your account**

We retain such communications to resolve issues, comply with legal obligations, and improve the safety and transparency of the Platform.

SECTION 2: LEGAL BASIS & PURPOSES OF PROCESSING

Scopium processes personal data in accordance with applicable data protection laws, including the **General Data Protection Regulation (EU) 2016/679 ("GDPR")**, the **UK GDPR**, and equivalent global frameworks. We rely on a combination of legal bases to lawfully process user data, depending on the nature of the data and the purpose for which it is used.

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Below is a detailed overview of the **legal grounds** and **intended purposes** for which Scopium collects and processes your information:

2.1 Contractual Necessity

We process certain data because it is **necessary to perform a contract** or to take steps prior to entering into a contract. This includes:

- Creating and managing your user account
- Enabling core functionality of the Platform, including token creation, trading, or donation processing
- Providing customer support and responding to user inquiries
- Enforcing our Terms & Conditions, KYC requirements, and streaming access policies
- Communicating with users regarding account activity, transaction confirmations, and platform notifications

2.2 Legal Obligation

We are required by law to collect and retain certain categories of data to comply with financial regulations, anti-money laundering (AML) laws, tax obligations, and fraud prevention protocols. This includes:

- Collection and verification of KYC documentation for streamers
- Retention of KYC data for compliance with reporting and regulatory duties
- Cooperation with law enforcement or regulatory authorities in case of legal requests
- Logging IP addresses and transactional activity for security and audit purposes

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2.3 Legitimate Interests

In some cases, we process data based on our **legitimate interests** in operating, securing, and improving the Platform, as long as such interests are not overridden by your rights or freedoms. These include:

- Preventing fraud, abuse, or unauthorized access
- Monitoring system performance and ensuring platform stability
- Investigating reports of policy violations, content abuse, or unlawful behavior
- Analyzing usage trends to enhance the user experience
- Enforcing platform rules and maintaining community standards

2.4 Consent

Where required by law, or where no other lawful basis is appropriate, we rely on your **explicit consent** to process data. This applies to:

- The use of certain non-essential cookies (analytics, marketing, preference cookies)
- Sending marketing communications or updates (only where legally permitted and opt-in)
- Enabling streaming and donation features after KYC
- Processing any data for optional features or services not required for account functionality

You have the right to **withdraw consent at any time**, without affecting the lawfulness of processing based on consent before its withdrawal.

2.5 Vital Interests & Legal Claims

In rare circumstances, we may process data to:

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- Protect the vital interests of the user or another person (e.g., in case of fraud or threats to personal safety)
- Establish, exercise, or defend against legal claims in litigation or dispute resolution

SECTION 3: HOW WE SHARE YOUR DATA

Scopium takes privacy and data protection seriously. We do **not sell** your personal data to third parties. However, we may **share your data** in limited circumstances with trusted service providers, partners, and regulators to fulfill our legal and operational obligations, or where required to deliver core platform functionality.

Below is an overview of the **categories of third parties** we share data with and the **purposes** for such sharing:

3.1 Service Providers and Subprocessors

We engage carefully vetted third-party vendors to help us operate and improve the Scopium platform. These include providers in the following categories:

- **Cloud hosting and infrastructure providers** (e.g., for servers, databases, content delivery)
- **KYC and identity verification providers** (for streamers completing required onboarding)
- **Analytics and usage monitoring platforms** (to track behavior and enhance performance)
- **Payment gateways or blockchain integrations** (for token trades or donations)
- **Email and notification services** (for account communications and alerts)
- **Cybersecurity providers** (for fraud monitoring, DDoS protection, and bot filtering)

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All third-party subprocessors are contractually bound by confidentiality obligations and are **only permitted to process data as necessary to provide their specific service** on our behalf.

3.2 Public Blockchain Networks

Certain data, such as **wallet addresses** and **transaction hashes**, are inherently public when interacting with blockchain-based features. These are:

- **Stored on-chain and visible to anyone using block explorers** (e.g., Solscan for Solana)
- Not directly linked to personally identifiable information unless you associate your wallet with your Scopium account or public identity

We do not control the accessibility or permanence of on-chain data. Blockchain data is not deletable and may be used by third parties (e.g., indexers, aggregators) beyond our control.

3.3 Legal and Regulatory Disclosures

We may disclose your information to public authorities, regulators, law enforcement, or legal counsel if required to do so by law or where we believe in good faith that such disclosure is reasonably necessary to:

- Comply with legal obligations (e.g., AML regulations, court orders, or subpoenas)
- Investigate, prevent, or take action against suspected illegal activities or violations of our Terms
- Protect the rights, safety, or property of Scopium, our users, or the public

Where feasible and not legally prohibited, we will attempt to **notify you before such disclosure** is made.

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3.4 Corporate Transactions

In the event of a corporate transaction, such as a **merger, acquisition, financing, reorganization, or sale of assets**, your personal data may be transferred to the acquiring or successor entity. In such cases:

- We will ensure that the new entity is subject to the same or substantially similar data protection commitments
- You will be notified of the transaction via email or platform announcement if required by law

3.5 Cross-Border Data Transfers

As a global platform, we may store or process your data on servers located **outside of your home country**, including in jurisdictions **that may not offer the same level of data protection** as your country of residence.

Where data is transferred from the **European Economic Area (EEA), United Kingdom, or Switzerland** to third countries:

- We implement **Standard Contractual Clauses (SCCs)** or rely on other **lawful mechanisms** (e.g., adequacy decisions, binding corporate rules) to ensure data protection standards
- You may **request a copy of the relevant transfer mechanism** used for your personal data by contacting us

SECTION 4: DATA RETENTION & USER RIGHTS

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4.1 Data Retention Periods

Scopium retains personal data only for as long as necessary to fulfill the purposes for which it was collected, including to comply with legal, regulatory, accounting, or reporting obligations. The retention periods vary depending on the type of data and your role on the platform (e.g., trader vs. streamer).

Data Category	Retention Period
Account information (email, wallet link, preferences)	For the life of the account, or until deleted by user
KYC data (ID, selfie, proof of address)	**Indefinitely**, for legal and regulatory compliance
Transaction logs (e.g., trade records, token mints)	**60 days** from date of action or event
Streaming metadata (IP, device)	**60 days** from date of stream
Chat logs / communications	Up to **60 days** after submission or stream end
Customer support and enforcement data	Case-by-case; retained until resolved or closed
Cookie data	See Section 6: Cookie Usage

Upon expiry of the retention period, data is securely deleted, anonymized, or aggregated unless it is required for the establishment, exercise, or defense of legal claims.

4.2 Your Data Protection Rights

Subject to applicable law, you have the following rights in relation to your personal data:

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a) Right to Access

You have the right to request a copy of the personal data we hold about you, along with certain related information, free of charge.

b) Right to Rectification

You may request correction of inaccurate or incomplete personal data we maintain about you.

c) Right to Erasure ("Right to be Forgotten")

You may request deletion of your personal data where there is no compelling reason for its continued processing, provided no legal or regulatory obligation requires its retention.

d) Right to Restrict Processing

You may request that we suspend processing of your data under certain circumstances (e.g., pending a data accuracy challenge or objection).

e) Right to Object to Processing

You may object to processing based on legitimate interests or direct marketing. We will cease processing unless we demonstrate compelling legitimate grounds to continue.

f) Right to Data Portability

You have the right to receive a copy of your personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller, where technically feasible.

g) Right to Withdraw Consent

Where processing is based on your consent (e.g., optional cookies, marketing), you may withdraw that consent at any time without affecting the lawfulness of prior processing.

h) Right to Lodge a Complaint

You have the right to file a complaint with a **supervisory authority** in your jurisdiction if you believe that our data handling practices violate applicable laws. For users in the EU, you may

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contact your national Data Protection Authority. For UK users, this is the **Information Commissioner's Office (ICO)**.

4.3 Exercising Your Rights

To exercise any of your data rights, please contact us at:

Email: info@scopium.io
Subject Line: "Data Rights Request – [Your Name]"

We may request proof of identity or additional information to verify your request. All valid requests will be processed **within one (1) month**, subject to legal extensions for complex or excessive cases.

SECTION 5: AUTOMATED DECISION-MAKING, AGE RESTRICTIONS & DATA SECURITY

5.1 Automated Decision-Making & Profiling

Scopium may use automated tools and logic-based systems to assist in platform operations, especially where it is necessary to ensure compliance, security, and platform integrity. These automated processes may include:

- **Fraud detection algorithms** to flag unusual or potentially malicious wallet behavior
- **IP and device reputation scoring** to identify abuse, bot usage, or unauthorized access
- **Streaming and trading activity analysis** for risk scoring, feature restrictions, or enhanced KYC triggers
- **Content moderation filters** for detecting banned or suspicious keywords in streaming metadata or user submissions

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These systems help us make faster and more consistent decisions in line with our Terms & Conditions, but human review is available in cases where users seek clarification, appeal a decision, or contest an enforcement action.

If you are subject to a decision based solely on automated processing that produces legal or similarly significant effects (e.g., denial of monetization or account suspension), you may request a review by a human decision-maker.

5.2 Age Restrictions and Children's Privacy

Scopium is intended **strictly for users aged 18 and older**. We do not knowingly collect, solicit, or process personal data from children under the age of 18, and the platform is not designed to be used by minors under any circumstances.

By using our services, you represent and warrant that you are **at least 18 years old** and have full legal capacity to enter into a binding agreement.

If we learn that we have inadvertently collected personal information from a minor under the applicable age threshold, we will delete that information promptly and take reasonable steps to block access to the associated account.

5.3 Data Security Measures

We implement **industry-standard technical and organizational measures** to safeguard the confidentiality, integrity, and availability of your personal data. These measures include, but are not limited to:

- **Encryption in transit and at rest**, where applicable
- **Firewalls and intrusion detection systems**
- **Strict access controls** based on role, purpose, and need-to-know

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- **Secure storage of KYC records** in protected infrastructure provided by certified third-party vendors
- **Regular vulnerability assessments and patching**
- **Account activity monitoring** to detect and respond to unusual behavior

While no system can guarantee absolute security, we are committed to **minimizing risks of unauthorized access, data loss, or compromise** through rigorous security practices and continuous improvements.

5.4 Security Breach Notification

In the event of a data breach that is likely to result in a high risk to your rights or freedoms, we will:

- Notify you **without undue delay** after becoming aware of the breach
- Provide details of the nature of the breach, the likely consequences, and the measures taken or proposed to address it
- Notify relevant data protection authorities in accordance with applicable legal requirements

SECTION 6: COOKIES, TRACKING TECHNOLOGIES & DO-NOT-TRACK

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6.1 Use of Cookies and Similar Technologies

Scopium uses cookies and related technologies (such as local storage, pixels, and device fingerprinting) on its websites and services to improve user experience, maintain platform security, and deliver personalized content.

Cookies are small data files stored on your browser or device that allow us to recognize you, remember your preferences, and analyze how our services are used.

We categorize our cookies as follows:

a) Strictly Necessary Cookies

These cookies are essential for the functioning of the Platform and cannot be disabled. They are used to:

- Authenticate sessions
- Maintain user logins
- Enable core features such as token creation, trading, and donation tools
- Protect against malicious activity and fraud

b) Analytics Cookies

These cookies collect aggregated data to help us understand how users interact with the Platform and how to improve our content, features, and layout. Examples include:

- Page views
- Navigation paths
- Device/browser metrics
- Geographic breakdowns (non-identifying)

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We use third-party analytics providers such as **Google Analytics** or equivalent GDPR-compliant tools.

c) Preference Cookies

These cookies allow us to remember your personal settings, such as:

- Language and region
- Theme or layout choices
- Consent banner acknowledgments

Disabling these cookies may affect usability and personalization.

d) Marketing Cookies

While Scopium does not display third-party advertisements, we may use first-party marketing cookies to:

- Track platform feature usage for internal promotional analytics
- Measure engagement with Scopium platform announcements or releases

No invasive ad tracking or behavioral profiling is conducted.

6.2 Cookie Consent and Management

Upon your first visit to Scopium, you will be presented with a cookie banner allowing you to:

- Accept all cookies
- Reject non-essential cookies
- Customize your preferences

You can update your preferences at any time by accessing the “Cookie Settings” panel located in the footer of our site. Most browsers also offer tools to delete or block cookies globally.

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Please note that disabling cookies may affect your ability to use certain features or complete transactions on the Platform.

6.3 Do-Not-Track (DNT) and Global Privacy Controls

Scopium respects browser-based **Do-Not-Track (DNT)** signals and **Global Privacy Control (GPC)** headers where technically feasible and legally required.

If your browser sends a DNT or GPC signal:

- We will treat this as an **opt-out from non-essential cookies** (e.g., analytics and marketing)
- Essential cookies required for platform security and functionality will continue to be set unless prohibited by law

We continue to monitor developments in global privacy standards and will update our compliance mechanisms as required.

SECTION 7: CONTACT INFORMATION, POLICY UPDATES & SUPERVISORY AUTHORITY

7.1 Contacting Us

If you have any questions, requests, or concerns regarding this Privacy & Cookie Policy, your personal data, or your rights under applicable law, you may contact us at:

Scopium / Scopium Exchange
Attn: Privacy Compliance
Email: info@scopium.io
Registered Address: London, United Kingdom

We aim to respond to all legitimate data inquiries within **30 days**, though this period may be extended in complex cases. If your request involves sensitive data (e.g., access, deletion), we may require identity verification.

7.2 Data Protection Officer (DPO)

Although Scopium does not currently process sensitive data at a scale that mandates the appointment of a Data Protection Officer (DPO) under the GDPR or UK GDPR, we are committed to high privacy standards and have designated an internal privacy contact point.

Should our operations expand into regulated data categories or markets, we will publicly appoint a DPO and update this section accordingly.

7.3 Changes to This Policy

We may update this Privacy & Cookie Policy from time to time to reflect changes in:

- Legal or regulatory requirements
- Our data practices or product features
- Security or technical developments
- Platform structure or jurisdiction

All updates will be published with a new "**Last Updated**" date at the top of the policy. For material changes that affect your rights or our obligations, we will notify you:

- Through a platform notification or banner, and/or
- Via email (if you have provided one)

You are encouraged to review this Policy periodically to stay informed about how we process your data.

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7.4 Supervisory Authority

If you are located in the **European Economic Area (EEA)**, **Switzerland**, or the **United Kingdom**, and believe we have not adequately resolved a privacy complaint, you have the right to lodge a complaint with your local data protection authority.

For example:

- **UK Users:**
  Information Commissioner's Office (ICO)
  Website: https://ico.org.uk
- **EU Users (General):**
  You may contact your national supervisory authority listed here:
  https://edpb.europa.eu/about-edpb/board/members_en

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