

Amazing Teknoloji ve Pazarlama A.Ş.

Privacy Policy of <https://maxiruby.com/>

Introduction

This Privacy Policy describes how Amazing Teknoloji ve Pazarlama A.Ş. (herein referred to as "Maxiruby", "We", "Our", and "Us") collects, uses, processes, discloses, shares, transfers, and protects the information You provide on <https://maxiruby.com/> ("Website"). This Privacy Policy constitutes a part of the Terms and Conditions of the Website ("T&Cs"). The terms used in this Privacy Policy will share the same definition as those stipulated in the T&Cs except for others indicated herein.

We respect and value your privacy as well as the integrity of the information You have provided and/or permitted Us to collect. Thus, We endeavour to follow industry standards to ensure the security and confidentiality of your Personal Information when You use Our Services or access Maxiruby Platform.

When accessing, connecting, using, clicking carefully read, acknowledge, understand, and accept all terms stipulated in this Privacy Policy. We will on, or engaging in any Services provided on Maxiruby Platform, You are strongly advised to not use your information, in any shape or form, for any other purpose that has not been indicated in this Privacy Policy or the T&Cs without providing You prior notification or obtaining consent from You.

This Privacy Policy has incorporated several provisions from the General Data Protection Regulation ("GDPR"), specifically following its Personal Information Processing rules within the European Economic Area ("EEA").

This Privacy Policy will inform You about the following matters among several others:

Acceptance of the Privacy Policy

Our Relationship with You

Personal Information that We collect

How We collect Personal Information

How We use Personal Information

How We protect Personal Information

How long We retain Personal Information

Cookies

Sharing your Personal Information

Third-Party Collection of Personal Information

Designated Countries and Your Legal Rights

Rights of the residents of the EEA

Cross-Border Transfer of Personal Information

Limitations

Updates or amendments to the Privacy Policy

How to contact Maxiruby

Acceptance of the Privacy Policy

By accessing, connecting, clicking on, using, or engaging in Our Services, You indicate and confirm that You have consented and agreed to the terms of this Privacy Policy. We will not use your Personal Information for any other purpose that has not been covered in this Privacy Policy or the T&Cs without providing You prior notification or obtaining your consent.

If You do not agree, either partially or wholly, to this Privacy Policy, You must immediately discontinue accessing, connecting, using, or engaging in Our Services and Maxiruby Platform. This Privacy Policy does not apply to services offered by other companies or service providers or other websites linked from Our Platform.

Our Relationship with You

Maxiruby has the relationship with individuals on its Services as described below:

"User" is an individual providing personal information to Us via Our Website, Medium pages, social media accounts, or other means. For example, User can engage and complete additional Maxiruby social media engagement tasks, to entitle for add up to the whitelist for each IDO fundraising event or interact with Us on Our social media accounts.

Hereinafter, We may refer to User as "You" in this Privacy Policy.

Personal Information that We collect

For the purposes of this Privacy Policy, Personal Information is information that can be used to identify, describe, relate, or associate with a particular individual. The following are the types of information We collect, store, and process when You use Our services:

Information provided by You when connecting with MAXIRUBY and for KYC purpose

Prior to connecting or participating in MAXIRUBY Platform to use Our Services, You must provide Us with your full name, birthday date, nationality, home address, location, government identification number (Identification Card/Passport Number and Date of the Issuance of Identification Card/Passport), telegram username, digital wallet address, email address, IP address, documentation for proof of address and other information as We required which can be used to distinguish your identity, to access the MAXIRUBY Platform and for the Know Your Customer ("KYC") Verification purpose. Additionally, You will use single sign – on (also known as "OAuth") by logging in to Our Services using Metamask. These services will authenticate your identity and provide You the option to share certain information with Us such as your username and email address.

Furthermore, You will be required to upload facial image data, namely photo images of your face and provide additional information when firstly connecting with MAXIRUBY such as linking to your Facebook account, Telegram, LinkedIn, GitHub, Google, or Twitter of other social media accounts, and more.

Information collected by Us as You use Our services

Usage Information

When You engage or use Our Services, We will monitor your information in relation to your usage of MAXIRUBY Services through your device such as your IP address, phone number, the type of device You use to access Our Platform, device information, which websites You visited before accessing Our Services or Platform, browser type, Information about your browser, Date and Time You visit Our Platform, Volume of data transmitted and network operator. This information will either be directly obtained by MAXIRUBY or through third party service providers.

We collect this type of information to ensure that Our interface and/or Platform is seamlessly accessible for all users around the world, except users in the prohibited jurisdictions.

Communication Information

You hereby agree that We are entitled to collect and use or process the Personal Information You have provided on Our Platform or generated through your usage of MAXIRUBY Services for the purpose of being able to communicate with You through messages, requests, emails, live chats, file attachments in connection with your transactions on MAXIRUBY, or any other information related to your contact with MAXIRUBY. If You contact Us, We will keep a record of the information shared during the correspondence.

Financial Information

You hereby agree that, for the purposes stipulated in this Privacy Policy, We are entitled to collect and use the information contained in or related to your financial information when You use Our services. This includes, without limitation, your transaction history such as your initial cryptocurrency or token amount, your MAXi Token amount, your staking instructions, your BEP-20 wallet address etc.

We collect this financial information to monitor suspicious financial activities to protect You from fraud, resolution of legal cases, as well as any other purposes disclosed in this Privacy Policy.

Parts of MAXIRUBY Services are public, including any information disclosed on Our social media accounts, thus You acknowledge that such parts of MAXIRUBY Services may appear on search engines or other publicly available platforms, and may be "crawled", searched and used by the third parties or other Users and Customers of the Services. Please do not post any information that You do not wish to reveal publicly.

How We collect Personal Information

Information automatically collected by Us

We will collect and process Personal Information automatically provided by You under the following situations.

when You visit and/or firstly connect with the Website;

when You voluntarily complete any user survey or provide feedback to Us via emails or any other electronic channels including on Our social media accounts;

when You use browser cookies or any other relevant software upon visiting the Website; or

other situations where We may automatically collect your information as described in this Privacy Policy, Our T&Cs, or other relevant agreements with You.

Information collected by the third-party

We will collect your Personal Information from the third parties as required or permitted to the extent of applicable laws. Information from the third-party sources will include, but will not be limited to, public databases, ID verification partners, KYC Verification partners, blockchain data, marketing partners and resellers, advertising partners, and analytics providers.

Anonymized and Aggregated Data

We will also collect other Information in the form of anonymized and aggregate information where all information will be combined and then removed of personally identifiable information, making it unusable for the identification of specific individuals. Aggregated data could be derived from your personal data, but it is not considered as personal data under applicable laws. For example, We may aggregate your usage data to calculate the percentage of users accessing a specific feature of MAXiRUBY Services. However, if We combine or connect aggregated data with your personal data so that it can directly or indirectly identify You, You acknowledge that We treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We use anonymized or aggregate users' information for the purposes stipulated in this Privacy Policy at any time, including gaining better understanding of users' needs and behaviours, conducting business intelligence and marketing initiatives, and detecting security threats. In this regard, We reserve the right to implement innovative technologies as they become available to be used for strategic planning and operational processes.

How We use Personal Information

Your Personal Information will be made available to need-to-know basis to MAXiRUBY, Our Affiliate, Our Partners and/or within Our group of companies. This will include, but not be limited to, the employees and/or any persons or third parties working for MAXiRUBY who are responsible for using and protecting your Personal Information.

We use and process your Personal Information for the following purposes or in the following ways:

To provide Our Services

We respect data protection principles, and process personal data only for specified, explicit, and legitimate purpose for which such personal data were provided. We primarily use your Personal

information, either collected or delivered, in order to enable your use of MAXIRUBY Services (including, but not limited to, processing transactions), to improve the efficiency of the Services, the process to participate in the IDO fundraising project event, and to verify your identity.

To protect users

We use the information collected to protect Our Platforms, Users' information, and archives. We also use IP addresses and cookies to detect suspicious activities and to protect against automated abuse such as spam, phishing, and Distributed Denial of Service ("DDoS") attacks, and other security risks.

To comply with regulations and compliance

For Our legitimate interests, We will use the information in compliance with Our legal obligations, global and local industry standards, and Our AML/KYC/CTF procedures. In the case where it is strictly necessary (i.e., to protect the vital interests of the users or other natural persons, to prevent or mitigate fraud, to fulfil the purpose of public interest, or to pursue Our reasonable interests), We may use and process your Personal Information without obtaining your consent. You hereby expressly authorise MAXIRUBY to disclose any and all information relating to You in MAXIRUBY's possession to any law enforcement or government officials upon a valid request.

For measurement, research and development purposes-

We actively measure and analyse your information to understand the way You use and interact with Our Services, and Our Platform, and to provide You with the unique and personalized experience. For example, We allow You to use social media plugins on Our Services (e.g., Telegram, Twitter, etc.), We keep track of your preferences such as display name, time zone, and so on. This review is continuously conducted by Our operation teams to continuously improve Our Platforms' performance and to resolve issues with User experience.

In addition, We use such information to monitor trends, and improve Our Services, Our administration, the content and layout of the Website, and to develop new Services for You.

For communication purposes

We use your Personal Information, collected or derived from your communication devices or your email address, to interact with You directly, to provide You with necessary support, and/or to keep You informed of wallets connected, transactions, staking instructions, security details, as well as other aspects. All direct communications will be appropriately maintained at MAXIRUBY, or the service providers designated by MAXIRUBY, to be reviewed for accuracy, retained as evidence, or

used to perform other statutory requirements or other obligations as stipulated in this Privacy Policy and the T&Cs.

To enforce Our T&Cs, and other relevant agreements

Personal Information is also used to enforce Our T&Cs continuously and actively among, and other agreements relating to the Services on MAXiRUBY Platform . Activities in this regard include, but are not limited to, reviewing, processing, verifying, investigating, mitigating and preventing any potentially prohibited or illegal activities that may violate preceding provisions, or disclose relevant information to third parties in accordance therewith. In light of this, MAXiRUBY shall be entitled to freeze/close/delete accounts or any User activity on the Website as necessary to any User found to be engaged in any activities that violate Our T&Cs and other relevant agreements.

For marketing and advertising

We will share your Personal Information with Our marketing partners for the purposes of targeting, modelling, and/or identifying analytics as well as marketing and advertising. We may send You marketing communications to alert You about new Services, yet You can opt-out of Our marketing activities at any time.

For other purposes

Provided that we need to process or use your Personal Information for other purposes not stipulated in this Privacy Policy, We will notify or request your consent to use such information. We will not use your Personal Information for purposes other than the purposes stipulated in this Privacy Policy without your prior consent except where it is necessary for our legitimate interests (or for Our Affiliate, Our Partners and/or Our group of companies) and your interests and fundamental rights do not override those interests.

How We protect Personal Information

MAXiRUBY takes reasonable care to protect the MAXiRUBY's security as well as your Personal Information from loss, misuse, disclosure, alteration, and destruction. We take reasonable steps to maintain physical, technical, and employ procedural safeguard to ensure the confidentiality, integrity of your Personal Information. The safeguards include the use of firewalls, and data encryption, enforcing physical access controls to Our premise and files, and limiting access to Personal Information only to those employees, agents or third parties who need access to that information to process it for Us.

We also implement certain reasonable security measures to protect your Personal Information from unauthorized access, and such security measures are in compliance with the security practices and procedures as prescribed under the applicable laws.

However, You agree and acknowledge that it is impossible to fully guarantee the security of your Personal Information by implementing the above-mentioned safeguard and measures. It is not absolute protection to your Personal Information and by accessing the Services.

You agree that We will not hold any responsibility for the acts committed by those who gain unauthorized access or abuse your information and services. In addition, We will not hold any responsibility for any act committed by the third-party service providers who are contractually engaged with Us to maintain an appropriate security measure for protecting your Personal Information. Thus, You are recommended to understand this responsibility and to independently take safety precautions to protect your Personal Information, particularly your credential information such your BEP-20 wallet address. You hereby agree that We will not be liable for any information leakage and other damage or loss not caused by Our intention or gross negligence, including, but not limited to, hacker attacks, power interruptions, or unavoidable technical failures.

How long We retain Personal Information

You are aware that your Personal Information will continue to be stored and retained by Us or by a third-party processor engaged by Us for KYC Verification while You have been using or accessing MAXIRUBY Platform and the Services, and after your use of the Services for a reasonable period of time stipulated under the applicable law.

In addition, We may be required by applicable laws and regulatory requirements to retain certain information, including your Personal Information, your identification verification materials, information relevant to AML/KYC/CTF procedures, information related to staking instructions, account agreements, and other agreements between Us and third-parties, account statements, and other records after You stop accessing or participating in MAXIRUBY.

Cookies

We will use cookies and other technologies or methods of web and analytic tools to gather, store, and analyse certain information related with your access to and activities through the Services, including when You visit the Website.

A "cookie" is a small piece of information that a website assigns to your device while You are viewing a website. Cookies are beneficial and may be used for various purposes. These purposes include, among other things, allowing You to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between You and the Services quicker, easier and smoother. Our Website will use the following types of cookies:

Strictly Necessary Cookies

These cookies are essential to enable You to log in, navigate a website, and use its features or to provide a service requested by You. We will not need to obtain your consent in order to use these cookies.

Functionality Cookies

These cookies allow the website to remember choices You make (such as your username, language, or the region You reside in) and provide enhanced, more personal features. The information these cookies collect remains anonymous, and they cannot track your browsing activity on other websites.

Performance cookies

These cookies collect information about how You use a website, for example, which pages You go to most often, how much time You spend on a page, record difficulties You may experience while using the website such as error messages. All information collected by these cookies is aggregated and therefore anonymous. It is only used to improve the efficiency of the website.

Targeting Cookies or Advertising Cookies

These cookies are used to deliver advertisements tailored to You and your interests specifically. They are also used to limit the number of times You see an advertisement as well as help measure the effectiveness of the advertising campaign. These cookies remember that You have visited a website, and this information is shared with other organizations such as advertisers. Quite often targeting or advertising cookies will be linked to the sites' functionality provided by the other organizations.

You may remove these cookies by following the instructions of your device preferences. However, if You choose to disable cookies, some features of MAXiRUBY Services may not operate properly or become inaccessible, and your online experience may be limited. For Further information please visit our Cookies Policy.

Sharing your Personal Information

We will not rent, sell, or disclose your Personal Information to any third parties, except to those who require access to the information to perform their tasks and duties under the binding agreements executed with Us and to share with third parties who have a legitimate purpose for accessing it.

We may share, transfer, disclose, or allow access to your Personal Information to the following third parties for the purposes described below:

We may disclose Personal Information to the third parties in order to administer or process a transaction, or services You have authorized or requested, or in the context of facilitating the execution of a transaction, or We may disclose Personal Information to third parties that provide supporting services, or analytical information for the purpose of the Service improvement, only where we have a lawful basis to do so or under an agreement or legal requirements for the transfer of Personal Information.

We will be required to verify your identities by applicable laws and regulatory requirements and rely on third-party services to perform these verifications. Personal Information that You provide to Us during the initial connecting process is passed to these services at KYC Verification process and on an ongoing basis thereafter.

We may disclose or transfer a part of your Personal Information We collect if We are involved in a business transition or any merger and/or acquisition (M&A) projects. In such M&A event, your Personal Information might be among the assets transferred, but it will be protected and secure in accordance with this Privacy Policy.

We may share your Personal Information with law enforcement, and government officials when We are compelled to do so by a subpoena, a court order to prevent financial loss, to report suspected illegal activity or to investigate violations of any of Our T&Cs or any other applicable policies.

We may share your Personal Information with third-party processors acting on behalf of MAXIRUBY or engaged by MAXIRUBY to process your Personal Information for MAXIRUBY, Our Affiliate and/or Our Partners.

All Affiliate and Third Parties with whom We share your Personal Information have their privacy policies. However, they will be expected to protect this information in a manner that aligns with the provisions described in this Privacy Policy.

Third-Party Collection of Personal Information

This Privacy Policy only addresses the use and disclosure of the Personal Information We collect from You. To the extent that You disclose your information to other parties through the use of Our Services such as by clicking on a link to any other websites of our partner networks, different rules

regarding Privacy Policies may apply to their use or disclosure of the Personal Information You disclose to them.

You hereby acknowledge that We will not be responsible for the products, services, or descriptions of products or services that You receive from the third-party websites or to the content or privacy practices of the third-party websites. Also, this Privacy Policy will not be applied to any such third-party products and services that You access through MAXIRUBY Platform. You are knowingly and voluntarily assuming all risks of using third-party websites to purchase products or services, and You agree that We will have no liability whatsoever concerning such third-party websites and your usage of them.

Your relationship with these third parties and their services and tools is independent of your relationship with Us. These third parties may allow You to permit/restrict the information that is collected. It may be in your interest to individually restrict or enable such data collections.

Designated Countries Privacy Right and Your Legal Rights

This provision applies to Users of the Services that are located in the EEA, United Kingdom and/or Switzerland (herein collectively referred as "Designated Countries") at the time of Data or Personal Information being collected. We may ask your information regarding your nationality, your location, which country You are in when You use Our Services or Platform, or We may rely on your IP address. We cannot apply this provision to Users who do not provide information about the location or obfuscates location information so as not to appear located in the Designated Countries.

We use and process your Personal Information based on a valid lawful basis of the GDPR and any equivalent regulations (collectively referred as "Data Protection Laws"). The lawful basis for processing your Personal Information includes (i) your consent, (ii) performance of a contract, (iii) a legitimate interest, (iv) a compliance with legal obligations, (v) protection your vital interest, and (vi) public task.

In the event of any conflict or inconsistency between any term in this provision and other terms contained in this Privacy Policy, the term in this provision will govern and control over Users in the Designated Countries.

Under certain circumstances when You use Our Services, You have the rights under the Data Protection Laws in relation to your Personal Information. These rights include the followings:

Right to be informed

You reserve the right to be informed about the collection, use, and process of your Personal Information.

Right of access

You reserve the right to make a request for a copy of the Personal Information We hold about You and specific information regarding Our processing of this information.

Right to rectify

You reserve the right to request Us to update, correct, or complete your Personal Information that You believe to be outdated, inaccurate, or incomplete. You will rectify at any time by informing Us via our contact channels.

Right to Erasure ("Right to be Forgotten")

You may request to have your Personal Information deleted from Our records where (i) your Personal Information is no longer necessary to be used for the Services or on the Platform, (ii) Personal Information was collected in relation to processing that You previously consented to, but later withdrew such consent, or (iii) your Personal Information was collected in relation to processing activities to which You object, and there are no overriding legitimate grounds for Our processing.

Please be informed that the Right to be Forgotten mentioned above is not an absolute right. We are compelled to fulfil your request only where the retention of your Personal Information might cause an infraction of the GDPR or applicable law to which We are subject. We shall exercise reasonable efforts in having your Personal Information erased to the extent required by the GDPR or applicable law including in communicating erasure to Our recipients of your Personal Information unless that proves to be impossible or a disproportionate effort.

Right to data portability

You reserve the right to request to transfer a machine-readable copy of your Personal Information to You or the third-party of your choice. We will provide You, or third-party, your Personal Information in a machine-readable format. This right only applies to Personal Information You have consented Us to use.

Right to restrict processing

You may request Us to restrict or suppress the processing of your Personal Information under certain circumstances as follows:

to contests the accuracy of the Personal Information;

when the processing is considered unlawful, but You do not wish to have your Personal Information erased;

where We no longer need to process your Personal Information, but the information must be retained for the establishment, exercise or defence of legal claims; and

where You have objected to Our processing your Personal Information, but We need to determine whether Our legitimate interest overrides your objection.

Right to object

You may object to Our reliance on Our legitimate interests as the basis of Our processing of your Personal Information that impacts your rights. You may also object to Our process of your Personal Information for direct marketing purposes.

Right to withdraw consent ("Opt-out")

You reserve the right to withdraw your consent at any time where We are relying on it to process your Personal Information. Withdrawing your consent does not affect the lawfulness of Our processing of your Personal Information prior to withdrawing.

If You wish to exercise these rights as aforementioned, please inform and contact Us via Our Platform, including the Website or send a request to support@maxiruby.com

Please also be noted that there are some limitations when You wish to exercise any one of these individual rights. We may limit your individual rights in the following situations:

- (i) Where denial of access is required by laws;
- (ii) When granting access would have a negative impact on others' privacy;
- (iii) In order to protect Our rights and properties;
- (iv) Where the request burdensome.

Cross Border Transfer of Personal Information

As a part of your use of and to ensure better and seamless delivery of the Services to You, We may store, process, analyse, transfer your Personal Information in location globally, including countries other than your home jurisdiction, and/or locations outside the Designated Countries where there may have data protections with less protection than the EU GDPR or the equivalent data protection laws.

Our Service and Platform contain the transmission of your Personal Information to or to be transferred to or to be processed outside of the country where You are located or outside the Designated Countries, it is not suggestible if your Personal Information is restrictive.

However, if You wish to continue using Our Services outside the Designated Countries and your home locations, We will ensure that We will transfer your Personal Information only to country that has the required contractual provisions for transferring Personal Information in place with the third parties to which your Information is transferred, or to country where is approved by the EU authorities as providing an adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection in the jurisdiction of the party receiving the information. In this manner, You hereby expressly consent to this transfer, and agree that We will not be responsible for any additional T&Cs, policies or any other guidelines implemented by any party receiving the information.

Limitation

Our Services are not designed for the individuals who are under the age of 18 or under the legal age to provide consent under the applicable laws of country or jurisdiction where You are using Our Services or Platform. If You are not over 18 or of the legal age of your country, You will not provide any Personal Information to Us, or to engage in Our services. We reserve the right to access and verify any Personal Information collected from You. If We are aware that You are under 18 or under the legal age who already shared your Personal Information with Us, We will then discard such information and block your access to MAXIRUBY Platform immediately.

We cannot guarantee that any losses, misuses, unauthorized accession, or alteration of your Personal Information will not occur. You hereby agree that You play a vital role in protecting your Personal Information, including your credentials.

Updates or amendments to the Privacy Policy

We will revise and update this Privacy Policy periodically, at Our sole discretion, and the most current version will be published on the Website or MAXIRUBY Platform (as reflected in the "Last Revised" heading).

In the event of any material change which may affect your usage on Our Services and Platform, We will notify You by means of a prominent notice in advance of such change coming into effect. A prominent notice may include sending through your email address or other communication channels You provide to Us or providing You with an in-application notice such as a banner or pop-up alerting You of the change on the Website. We strongly encourage You to review this Privacy Policy actively. If You do not agree, either partially or wholly, the revised Privacy Policy, You should discontinue accessing or using Our Services. Your continued access to and use of Our Services after any changes to this Privacy Policy constitutes your consent to any changes and agree to continue using the Services.

Furthermore, We may provide You with the "just-in-time" disclosures or additional information about Our data collection process, purposes for processing, or other information with respect to collection of your personal information. The purpose of the just-in-time notification is to supplement or clarify Our privacy practice or provide You with additional choices about how We process your personal information.

How to contact MAXIRUBY

For any questions regarding this Privacy Policy, your Personal Information collected or proceeded by Us, or in case You would like to exercise one of your legal privacy rights as stipulated in Clause 11, please submit your requests to support@maxiruby.com and visit Our Website at <https://maxiruby.com/>