

MobileCoin – Privacy Policy

Effective Date: 06/02/2022

MobileCoin Inc. (“MobileCoin,” “our,” or “we”) respects and values your privacy and wants you to be familiar with how we collect, use, protect, and disclose information from and about you. This Privacy Policy (“Policy”) describes our practices in connection with information collected through our website, mobile site and application, mobile integration, and other online services (collectively, “Services”), and through your interactions with us offline, as well as includes certain steps you can take to manage your privacy.

This Privacy Policy applies to our collection and use of your personal information (i.e., information that identifies a specific person, such as full name or email address). If you have any questions that we haven’t answered here, you can always contact us at privacy@mobilecoin.com or by visiting the **Contact Us** section below.

If you are located in the European Economic Area (EEA) and the United Kingdom (UK), please refer to the **European Economic Area (EEA) and the United Kingdom (UK) Section** below.

How does MobileCoin collect information?

- **From you.** We may collect personal information and other information that you provide when you use our Services, register as a user, attend an in-person event or communicate with us.
- **Automatically from Devices You Use to Connect with Us or Use our Services.** For more information about this, please see our "Cookies, pixel tags, and other tracking technologies " below.
- **From third parties.** We also collect information about you from various third parties in order to provide better service to you. This may include social media information, demographic information, and other attributes about you.
- **From publicly available sources.** If you choose to submit any personal information relating to other people, you represent that you have the authority to do so and permit us to use the information in accordance with this Policy.

You may also provide information about other MobileCoin or potential users through our Services. For example, if you want to communicate with another MobileCoin user, we will collect that person’s phone number.

If you submit any personal information relating to other people, for example, to use our “refer a friend” function, you represent that you have the authority to do so and to permit us to use the information in accordance with this policy.

What information does MobileCoin collect?

When you use our Services, we collect a variety of information from and about you and your devices. Some of this information identifies you directly (like an email address or phone number) while some of it is associated with you through your profile, or device. This includes:

- **User Information.** We need certain information to create and manage your user account, like your phone number. You may also choose to provide additional information like your name, display name, email address, and certain biographical details you feature in your profile.
- **Contact Information and Preferences.** Such as name, email address, mailing address and phone number and information from your mobile device's contacts.
- **Biographical and Demographic Information.** Such as date of birth, age, photo, other preferences.
- **Transaction and Payment Information.** Such as information we need to complete a transaction.
- **Internet Activity.** Such as your Internet Protocol ("IP") address, browsing history, your search history and information on your interaction with the Services and our advertisements
- **Device information.** Along with the information you give us directly, we collect a variety of information automatically as you use our Services. Like other websites and apps, we collect data about the browsers and devices you use to access MobileCoin. The data we collect includes browser or device model and settings, operating system, unique identifiers, and the version of the app you're using.
- **Usage Data.** We also collect data about how your browsers and devices interact with our services, including IP address, crash reports, system activity, and the date, time, and the URL of the site you visited before MobileCoin. If you access a Service from a mobile or other device, we may also collect a unique device identifier assigned to that device, geolocation data (including your precise location), or other transactional information for that device.
- **Other Personal Information.** Other information collected online or offline to help us better identify and offer services and information that we believe may be of interest to you, or help us better understand your experience with our products.
- **Fingerprint.** Upon your consent, collect your fingerprint so you can access our mobile application.
- **Communications with us.** Such as including interactions with us and contacts through social media channels

- **Fraud Prevention Information.** Data used to help identify and prevent fraud.
- **Inferences.** Inferences may be used to improve our Services and make them more useful to you, we use data about your activity to understand and infer your preferences.

How MobileCoin uses your information

- **Completing your transactions.** When you use MobileCoin to conduct transactions, we or our third party partners use your information to process and complete your transaction and confirm payment details, including, if required, your identity.
- **Providing and improving our services.** We or our third party partners use your information to provide services to you. This includes things like verifying your provided contact information so you can access the services, facilitating your transactions and enabling you to purchase cryptocurrency or communicate with other users. We also use your information to improve our existing services and develop new ones. For example, we track how you use our Services and use that information to troubleshoot issues and adjust things to improve your experience.
- **Communicating with you and connecting you with others.** We may periodically send promotional materials or notifications related to our Services. If you want to stop receiving promotional materials, you can change your user account setting or follow the unsubscribe instructions at the bottom of each email. Even if you unsubscribe from some email subscriptions, we may still need to email you with important transactional or other non-advertising information. For example, there are certain service notification and other non-promotional emails that you may not opt-out of, such as notifications of changes to the Services or policies, customer support, and user-initiated communications (e.g., our responding to comments, chats, questions, and requests you send us). If you have installed a mobile app and you wish to stop receiving push notifications, you can change the settings either on your mobile device or through the app.
- **Personalizing your experience.** We use the information we collect about you and your activity on our Services to personalize our offers. We also use it to show advertising, content, or features that we think you might like. This includes things like customized search results that match your preferences and prior search criteria. We do not, however, use your transactional and/or financial information for these personalization purposes.
- **Protecting the rights of MobileCoin and others.** There may be instances when MobileCoin may use or disclose your information, including situations where MobileCoin has a good faith belief that such use or disclosure is necessary in order to: (i) protect, enforce, or defend the legal rights, privacy, safety, or property of MobileCoin or our employees, agents and contractors (including enforcement of our agreements and our terms of service); (ii) protect the safety, privacy, and security of users of our Services or

members of the public; (iii) protect against fraud or for risk management purposes; (iv) comply with the law or legal process; or (v) respond to requests from public and government authorities.

Sharing your information

We understand that sharing information with third parties is a big responsibility. We're committed to sharing information only when needed for a legitimate business or legal purpose, and then only with recipients who we believe will protect it.

- **Information you ask us to share.** We share information when you ask us to share it. For example, if you choose to connect to another user through our Services, we will send them your name, public wallet address and avatar.
- **Service providers and business partners.** When MobileCoin hires a service provider to help operate our business, we may need to give them access to information to provide their service. We allow them to use the information only to perform the service we've asked them to perform. When MobileCoin partners with other businesses to offer products and services to you, we may share information with those partners as needed to provide those products and services and only subject to the terms of this Policy.
- **Legal and compliance transfers.** When MobileCoin needs to share data to satisfy a legal or regulatory requirement, including responding to a subpoena or other lawful government request for data, we will share information only as necessary to comply with that requirement. We may also share information if needed to enforce our legal rights, detect or prevent fraud or security concerns, and protect public safety. Recipients of your personal information may be law enforcement, government or regulatory bodies, authorities, or other authorized third parties.
- **In connection with a merger, acquisition, or business transfer.** If MobileCoin is involved in a merger, acquisition, or any form of transfer or sale of some or all of its business, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, we may share your information with parties that are involved in the transaction.
- **Public and deidentified data.** We may share information that is collected from public sources or that you choose to share publicly with third parties. We may also share aggregated and/or deidentified information that cannot reasonably be used to identify you.
- **Sales of personal information.** MobileCoin allows certain companies to place tracking technologies like cookies, pixels, and similar technologies on our sites, which allow those companies to receive information about your activity on MobileCoin that is associated with your browser or device. The companies may use that data to serve you more relevant ads on our sites or others. Under some state laws, sharing data for online

advertising like this may be considered a “sale” of information. Except for this kind of sharing, MobileCoin doesn’t sell any of your information for monetary consideration or value.

You have choices about how these technologies work on your devices. You can disable them entirely using our cookie consent preference tools or by clicking the “Do Not Sell My Information” link on our website.

Cookies, pixel tags, and other tracking technologies

We and our partners use various tools to collect data when you visit our sites and apps, including cookies, pixels, localStorage, and other similar technologies. Some of these technologies store data in the browser or on your device. Other technologies may use network-related or other information to recognize your device (e.g., IP address). Our Services use these technologies, for example, when you first request a web page and data is then stored on your computer or other device so the website or app can access information when you make subsequent requests for pages from that Service. These technologies may also be used to collect and store information about your usage of the Services, such as pages you have visited, search history, and the video and other content you have viewed.

When you use MobileCoin, we and our partners may use also use these technologies to gather information about how you view and use our services and content, and to connect your activity with other data we store about you. The use of these technologies helps us serve you better by understanding what you’re interested in, tracking trends, measuring the effectiveness of ads, saving your preferences, and storing information you may want to retrieve on a regular basis. We also allow specific, approved partners to collect data from your browser or device for advertising and measurement purposes using their own similar tools.

At any time, you can control the use of cookies by adjusting the settings on your browser. However, if you choose to disable some or all cookies, please note that by blocking any or all cookies you may not have access to certain features, content, or personalization available through our Services.

In addition, if you give your email address to us, we may use a scrambled form (called a “hashed” version) of your email address to deliver tailored ads to you on MobileCoin or on other websites, including via Custom Audience Feature or other similar tools.

For information about how you can manage your cookie and similar technologies preferences, check out the section of this Policy called “**Your privacy tools and choices.**” **You can also visit our [Cookie Policy](#).**

At this time we do not respond to browser ‘Do Not Track’ signals.

Managing communications preferences

We (or our service providers and advertising partners) may send you direct marketing communications and information about our products and services that we consider may be of interest to you and, where required by law, we will ask for your consent at the time we collect your personal information to conduct any of these types of marketing. To the extent permitted by applicable law, we will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by contacting us as set out in the “Contact Us” section below.

Please note that when you request an opt-out, it often takes some time to process these requests. Therefore, it is possible that you may receive promotions scheduled prior to our receipt of your withdrawal of consent.

If you opt out of or do not provide your consent to receiving marketing or commercial communications, we retain the right to send you non-marketing communications such as correspondence about your relationship with us, information about transactions, or notifying you of updates to our Privacy Policy or Terms of Service.

Applicability of this policy and Third party links

This Policy applies to every Service of ours that links to it. Our apps and services may link to other companies’ websites. Some features may also involve the sharing of your information with third-party websites and services (collectively “third-party websites”). These third-party websites may collect information about users on those websites. MobileCoin doesn’t control those websites, and this Policy does not apply to these external websites and third parties. Please check the relevant privacy policies before you submit any personal information to third parties.

Your privacy tools and choices

Depending on where you reside, you may have certain rights and choices regarding our processing of your personal information. These include:

• **The right to know the categories and/or specific pieces of personal information collected about you**, including whether that personal information is sold or disclosed and with whom it was shared;

- **The right to access** a copy of the personal information we retain about you;
- **The right to request deletion** of your personal information; and
- **The right to correct** your personal information.

We will verify your identity in connection with any requests and take steps designed to ensure that only you or your authorized representative and exercise these rights. If you are an authorized agent making a request, we may require and request additional information to verify you are authorized to make the request.

There may be situations where we cannot grant your request. Where we deny your request in whole or in part, we will take steps to inform you of the denial and provide an explanation of our actions and the reasons for the denial.

We will not restrict or deny you access to our products and services because of the choices you make in connection with your personal information, but please note, certain choices may affect our ability to deliver our services. For example, if you ask us to delete your account, you will not be able to use our transaction services.

You may exercise any of your rights in relation to your personal information by contacting us using the details provided in the **“Contact Us”** Section below.

Children’s Data

As set forth in our Terms of Service, our services are for a general audience, are not targeted to children, and do not knowingly collect personal information from children under 18 years of age.

International Data Transfers

MobileCoin is based in the United States . Any information you provide to us through use of the Sites and Services may be stored and processed, transferred between and accessed from the United States and other countries which may not guarantee the same level of protection of personal information as the one in which you reside. We may need to send your personal information overseas as part of our normal business operations. Provided the data protection laws of these other countries differ from those in the United States, please be assured that we take reasonable steps to ensure that your privacy is protected.

Security

We understand that no matter how we collect your information, we have a responsibility to protect it. We take that responsibility seriously. We maintain reasonable administrative, technical and physical safeguards designed to protect the personal information we maintain against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

We’re always looking for threats and take reasonable steps to respond to those threats, protecting the information users share with us. Of course, no method of Internet transmission or data storage can provide guaranteed protection to your information.

Data Retention

We retain personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy, or within three (3) years of your last interaction with us, unless a longer retention period is required or permitted by applicable law. We will permanently destroy data when the initial purpose for collection has been satisfied.

Please note that we often need to retain certain data for recordkeeping purposes, for purposes connected with the establishment, exercise or defense of legal claims and/or to complete any transactions that you began prior to requesting a change or deletion.

European Economic Area (EEA) and the United Kingdom (UK)

If you reside in the EEA and the UK, any personal information will be processed in accordance with applicable data protection laws that provide for certain restriction and special rights for you concerning the processing of your personal data by us. This section is designed to give you additional information required in the EEA and the UK.

a. What legal basis we rely on

We collect and process your personal information for a variety of purposes outlined in this Policy relying on the following legal bases:

- **Subject to consent:** In some cases, we will ask for your consent to process your personal information. You may indicate your consent in a number of ways including, as permitted by law, ticking a box (or equivalent action). We may request your consent for a number of activities, in particular for marketing (including from third parties), for placing certain cookies, and for processing your location data.
- **For the performance of a contract:** To perform our contractual obligations to you, including account registration, facilitating the processing of transactions you have made, contacting you in relation to any issues with your transaction, in relation to the provision of the Services.
- **To meet legal obligations:** To comply with laws, regulations, court orders, or other legal obligations or to assist in an investigation.
- **For our legitimate interests:** To operate our business and provide the Services, other than in performing our contractual obligations to you, and for our other "legitimate interests" in compliance with applicable law - except where overridden by your interests or fundamental rights and freedoms that require protection of personal information.

Our processing does not involve any automated decision-making. You are usually not obliged by law or by contract to provide any personal information to us; however, we may not be able to perform the activities described in this Policy without your personal information.

b. Additional rights

If you reside in the EEA, you have the rights outlined above in Section “Your privacy tools and choices”. In addition, under certain legal conditions, you have the rights to (i) restriction of processing, (ii) receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and the right to transmit this data to another controller, (iii) object to the processing, (iv) lodge a complaint with a competent supervisory authority, and (v) withdraw consent at any time, which does not affect the lawfulness of processing based on consent before the withdrawal

Contact Us:

For questions about your information or this policy please contact us at privacy@mobilecoin.com.

Changes to this Policy

MobileCoin may modify this Policy. Please look at the Effective Date at the top of this Privacy Policy to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Services. We encourage you to periodically review this Privacy Notice in order to keep apprised of any changes.