

Sosh, Inc. (“Sosh”) Privacy Policy

This Privacy Policy (“Policy”) describes how Sosh collects, uses and discloses information, and what choices you have with respect to the information. This Policy applies to the Soshnft.io (the “Site”) and services (collectively, the “Services”). When we refer to “Sosh”, we mean the Sosh, Inc. entity that acts as the controller of your information.

By using the Services, you accept the terms of this Policy and our [Terms of Service](#), and consent to our initial collection, use, disclosure, and retention of your information as described in this Policy and [Terms of Service](#). Please note that this Policy does not apply to information collected through third-party websites or services that you may access through the Services or that you submit to us through email, text message or other electronic message or offline.

If you are visiting this site from the European Union (EU), see our Notice to EU Data Subjects below for our legal bases for processing and transfer of your data.

1. What We Collect

We get information about you in a range of ways.

(a) [Information You Give Us](#). We collect and store information about you when you directly provide it to us. This happens when you:

- (i) register or create an account (e.g., your email address);
- (ii) request assistance from our customer support team;
- (iii) complete contact forms, request newsletters or other information, or participate in contests and surveys;
- (iv) make public contributions to the Service (e.g., when you interact with third parties through the Service or post a comment);
- (v) otherwise participate in activities we promote that require information about you;
- (vi) information related to NFT transactions, such as cryptocurrency wallet addresses, transaction history, and user preferences;
- (vii) receive your social media accounts; and
- (viii) payment methods.

(b) [Information Automatically Collected](#). We may automatically record certain information (“Log Data”) when you use and interact with our Site. Log data may include:

- (i) your general activity on the Site (e.g., your viewing history and search activity, including the date and time the Site was used);
- (ii) identifiers such as session identifiers;
- (iii) your geographic location;

(iv) website traffic volume, frequency of visits, and type and time of transactions you initiate through the site;

(v) information regarding your interacting with email messages (e.g., whether you opened, clicked on, or forwarded an email message);

(vi) your Internet Protocol (IP) address;

(vii) the type and settings of the device, operating system, and browser used to access the Site; and

(viii) other information gathered through cookies and similar technologies, which are discussed further in the section of this Privacy Policy entitled “Cookies”.

(c) Information We Will Never Collect. We will never ask you to share your private keys or wallet seed. Never trust anyone or any site that asks you to enter your private keys or wallet seed.

(d) Email Marketing. We offer electronic newsletters to which you may voluntarily subscribe at any time. We are committed to keeping your e-mail address confidential and will not disclose your email address to any third parties except as allowed in the information use and processing section or for the purposes of utilizing a third-party provider to send such emails. We will maintain the information sent via e-mail in accordance with applicable laws and regulations. In compliance with the CAN-SPAM Act, all e-mails sent from us will clearly state who the e-mail is from and provide clear information on contacting the sender. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails or by contacting us. However, you will continue to receive essential transactional emails.

(e) Payments. We may provide paid products and/or services within the Site, including platforms used for NFT transactions, such as blockchain networks or digital wallet providers. In that case, we use third-party services for payment processing (e.g., payment processors). We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

2. Use of Personal Information

To provide our Service we will use your personal information in the following ways:

(i) to operate, maintain, and optimize the Services, the Site and your account;

(ii) to improve the quality and types of services that we deliver;

(iii) to provide you with technical support;

(iv) to notify you of technical updates or changes in policy;

(v) to process transactions that you have conducted through the Site;

(vi) to collect aggregate statistics about your use of the Services, the Site and your account;

- (vii) to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities;
- (viii) to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and
- (ix) to improve Algorithmic purposes and quality improvement (e.g. additional features and functionalities).

3. Cookies

- (a) Cookies are required for this Site to function properly. Cookies are small text files that are placed on your computer by websites that you visit. These text files can be read by these websites and help to identify you when you return to a website. Cookies can be “persistent” or “session” cookies. Persistent cookies remain on your computer when you have gone offline, while session cookies are deleted as soon as you close your web browser. To find out more about cookies, including how to see what cookies have been set and how to block and delete cookies, please visit <http://www.aboutcookies.org/>.
- (b) We use cookies and similar technologies (such as action tags, also known as beacons, or pixels tags) for a number of purposes, including to remember preferences, track conversions, conduct marketing and promotional efforts, analyze site traffic and trends, and generally understand the online behaviors and interests of people who interact with our Site.
- (c) We use third-party analytics service providers to assist us in collecting and understanding website usage information. We use information from these services to help us improve our website and the services we provide to our users.
- (d) By using the Site, you agree to our use of these tracking technologies.

4. How to Disable Cookies

- (a) You can generally activate or later deactivate the use of cookies through a functionality built into your web browser. To learn more about how to control cookie settings through your browser:
 - (i) Click [here](#) to learn more about the “Private Browsing” setting and managing cookie settings in Firefox;
 - (ii) Click [here](#) to learn more about “Incognito” and managing cookie settings in Chrome;
 - (iii) Click [here](#) to learn more about “InPrivate” and managing cookie settings in Internet Explorer; or
 - (iv) Click [here](#) to learn more about “Private Browsing” and managing cookie settings in Safari.
- (b) If you want to learn more about cookies, or how to control, disable or delete them, please visit <http://www.aboutcookies.org> for detailed guidance. In addition, certain third party advertising networks, including Google, permit users to opt out of or customize preferences associated with your internet browsing.

(c) We may link the information collected by Cookies with other information we collect from you pursuant to this Privacy Policy and use the combined information as set forth herein. Similarly, the third parties who serve cookies on our Site may link your name or email address to other information they collect, which may include past purchases made offline or online, or your online usage information. If you are located in the European Economic Area, you have certain rights that are described above under the header “Notice to EU Data Subjects”, including the right to inspect and correct or delete the data that we have about you.

5. Sharing of Personal Information

We do not share or sell the personal information that you provide us with other organizations without your express consent, except as described in this Privacy Policy. We disclose personal information to third parties under the following circumstances:

(a) Affiliates. We may disclose your personal information to our subsidiaries and corporate affiliates for purposes consistent with this Privacy Policy.

(b) Business Transfers. We may share personal information when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.

(c) Compliance with Laws and Law Enforcement; Protection and Safety.

(i) We may share personal information for legal, protection, and safety purposes.

(ii) We may share information to comply with laws.

(iii) We may share information to respond to lawful requests and legal processes.

(d) Professional Advisors and Service Providers. We may share information with those who need it to do work for us. These recipients may include third party companies and individuals to administer and provide the Service on our behalf (such as customer support, hosting, email delivery and database management services), as well as lawyers, bankers, auditors, and insurers.

(e) Other. You may permit us to share your personal information with other companies or entities of your choosing. Those uses will be subject to the privacy policies of the recipient entity or entities.

(f) We may also share information about you in the following contexts:

(i) Pursuant to an investigation. We may investigate and disclose information from or about you if we have a good faith belief that such investigation or disclosure (a) is reasonably necessary to comply with legal process and law enforcement instructions and orders, such as a search warrant, subpoena, statute, judicial proceeding, or other legal process served on us; (b) is helpful to prevent, investigate, or identify possible wrongdoing in connection with the Site; or (c) protects our rights, reputation, property, or that of our users, affiliates, or the public.

(ii) As Anonymized Data. We frequently aggregate or de-identify personal data in a way that makes it impracticable to use that data to identify a particular person; we also sometimes maintain individual data records with personal identifiers removed. In this Privacy Policy, we refer to such data as “Anonymized Data” and do not consider it to be personal data. We may use

Anonymized Data in order to create statistical information regarding the Services, the Site and its use, which we may then share with third parties. Though it is impracticable for third parties to use Anonymized Data to identify a particular person, it is possible. Further, we have explained in other sections of this Privacy Policy that in combination with supplemental data taken from other sources, third parties may be able to reidentify you. By using the Site, you understand and acknowledge this risk.

(iii) International Transfer. The Company has offices outside of the EU and has affiliates and service providers in the United States and in other countries. Your personal information may be transferred to or from the United States or other locations outside of your state, province, country or other governmental jurisdiction where privacy laws may not be as protective as those in your jurisdiction. EU users should read the important information provided below about transfer of personal information outside of the European Economic Area (EEA).

6. Social Media Features and Widgets.

Our Site may integrate with social sharing features or other related tools which let you share actions you take on our Site with other apps, sites or media, and vice versa. These features may enable the sharing of information with your friends or the public, depending on the settings you establish with the social sharing site. These features may also collect your IP address and which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. Your interaction with these features are governed by the privacy policy of the relevant social sharing site. Please refer to the privacy policies of those social sharing sites for more information. As stated below, we cannot control Site visitors' and users' use of any such information or content you choose to make available publicly.

X. Links to Other Sites.

Our Site may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

7. "Do Not Track" Signals

Please note that your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. The Site does not alter its practices when it receives a "Do Not Track" from a visitor's browser.

8. How Information is Secured

(a) We retain information we collect as long as it is necessary and relevant to fulfill the purposes outlined in this privacy policy. In addition, we retain personal information to comply with applicable law where required, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Terms of Service, and other actions permitted by law. 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.

(b) In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

(c) We employ industry standard security measures, including encryption methods, data access controls, and regular security audits, designed to protect the security of all information submitted through the Services, including Non-Fungible Token (NFT) transactions and associated digital assets. These measures are implemented to prevent unauthorized access, maintain data integrity, and safeguard user privacy. However, it's important to note that while we take every reasonable precaution to secure user data and digital assets, the security of information transmitted over the internet can never be guaranteed. We are not liable for any interception, interruption, or unauthorized access to communications or data transmitted through the internet. Users of the Services play a crucial role in maintaining security by responsibly managing their passwords, user IDs, and other authentication credentials required for accessing password-protected or secure areas of our digital services.

9. Information Choices and Changes

(a) Accessing, Updating, Correcting, and Deleting your Information:

(i) You may access information that you have voluntarily provided through your account on the Services, and to review, correct, or delete it by sending a request to support@soshnft.io. You can request to change contact choices, opt-out of our sharing with others, and update your personal information and preferences. We may require that you are the user who you say you are by proving that you have control of your posting key via our conveyor API. For more information about our conveyor API please see [here](#).

(ii) Please note that other users may be able to identify you, or associate you with your account, if you include personal data in the content you post publicly. We are not responsible for, and this Privacy Policy does not apply to, information you choose to post publicly.

(iii) Please note that we have the right to reject deletion requests that are inconsistent with our Terms of Use, are unduly burdensome or repetitive, or that cannot be honored due to legal obligations or ongoing disputes, or where retention is necessary to enforce our agreements or protect our or another party's rights, property, safety, or security. This includes NFT transaction records, which may be retained based on specific criteria. For example, we may retain information to prevent, investigate, or identify possible wrongdoing in connection with the Site or to comply with legal obligations. The time-period for which we keep information varies according to the information's use. In some cases, there are legal requirements to keep data for a minimum period. Unless there is a specific legal requirement for us to keep the information, we plan to retain it for no longer than is necessary to fulfill a legitimate business need. Please also note that even after you have deleted your account, other content associated with your use of the Site may still be accessible and viewable in accordance with applicable law and our Terms of Use.

(b) We may retain Anonymized Data after you delete your account for analytics purposes.

10. Contact Information

We welcome your comments or questions about this Policy, and you may contact us at: support@soshnft.io.

11. Eligibility

If you are under the age of majority in your jurisdiction of residence, you may use the Services only with the consent of or under the supervision of your parent or legal guardian. The Site is not directed to children under 18 and children under 18 are not permitted to use the Site. We do not knowingly collect personal data from children under 18. If you become aware that a child has provided us with personal data without parental consent, please contact us (see “Contact Information”). If we become aware that a child under 18 has provided us with personal data without parental consent, we take steps to remove such information and terminate the applicable account.

*California residents under 16 years of age may have additional rights regarding collecting their personal information. Please see <https://oag.ca.gov/privacy/ccpa> for more information.

12. Notice to California Residents

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting your web browser's Preferences or Settings page. In addition to the rights, as explained in this Policy, California residents who provide Personal Information (as defined in the statute) to obtain products or services for personal, family, or household use are entitled to request and obtain from us, once a calendar year, information about the Personal Information we shared, if any, with other businesses for marketing uses. If applicable, this information would include the categories of Personal Information and the names and addresses of those businesses with which we shared such personal information for the immediately prior calendar year (e.g., requests made in the current year will receive information about the prior year). To obtain this information, please contact us.

California law may provide you with additional rights regarding our use of your personal information if you are a California resident. To learn more about your California privacy rights, visit <https://oag.ca.gov/privacy/ccpa>.

Under California Civil Code Section 1789.3, California users are entitled to the following consumer rights notice: California residents may reach the Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs by mail at 1625 North Market Blvd., Sacramento, CA 95834, or by telephone at (916) 445-1254 or (800) 952-5210.

13. Notice to EU Data Subjects

(a) Personal Information. With respect to EU data subjects, “personal information,” as used in this Privacy Policy, is equivalent to “personal data” as defined in the European Union General Data Protection Regulation (GDPR).

(b) Legal Bases for Processing. We only use your personal information as permitted by law. We act as the controller of information that we ask you to provide to register your email address/create an account and information that we automatically collect when you use the Site. We act as the processor of user-generated content and information provided to us by third parties or other

websites. We are required to inform you of the legal bases of our controlling and processing of your personal information, which are described in the bullet points below. If you have questions about the legal bases under which we process and control your personal information, contact us at support@soshnft.io.

(c) Controlling and Processing Purposes.

(i) Legal Basis

(ii) For compliance, fraud prevention, and safety

(iii) To provide our Service

These activities constitute our legitimate interests. We make sure we consider and balance any potential impacts on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by any adverse impact on you (unless we have your consent or are otherwise required or permitted to by law).

(d) With your consent. Where our use of your personal information is based upon your consent, you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us at support@soshnft.io.

(e) Use for New Purposes. We may use your personal information for reasons not described in this Privacy Policy, where we are permitted by law to do so and where the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis for that use. If we have relied upon your consent for a particular use of your personal information, we will seek your consent for any unrelated purpose.

(f) Your Rights. Under the GDPR, you have certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

(i) Opt-out. Stop sending you direct marketing communications which you have previously consented to receive. We may continue to send you Service-related and other non-marketing communications.

(ii) Access. Provide you with information about our processing of your personal information and give you access to your personal information.

(iii) Correct. Update or correct inaccuracies in your personal information.

(iv) Delete. Delete your personal information.

(v) Transfer. Transfer a machine-readable copy of your personal information to you or a third party of your choice.

(vi) Restrict. Restrict the processing of your personal information.

(vii) Object. Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You can submit these requests by email to support@soshnft.io. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us at support@soshnft.io or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

14. Cross-Border Data Transfer

Please be aware that your personal data will be transferred to, processed, and stored in the United States. Data protection laws in the U.S. may be different from those in your country of residence. You consent to the transfer of your information, including personal information, to the U.S. as set forth in this Privacy Policy by visiting our site or using our Service.

Whenever we transfer your personal information out of the EEA to the U.S. or countries not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be based on a data transfer mechanism recognized by the European Commission as providing adequate protection for personal information.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA.

15. Modifications to this Privacy Policy.

We may occasionally update this Privacy Policy. You can see when it was last updated by looking at the effective date at the bottom of this page. If we make any significant changes, including that we reserve the right to update the privacy policy as necessary to reflect changes in NFT-related services, regulatory requirements, or technological advancements. We'll post them prominently on our website and notify you by other means as required by law. Your continued use of the website after a revision to the Privacy Policy indicates your acceptance and agreement to the current Privacy Policy. We recommend that you periodically review the Privacy Policy to make sure you understand and are up-to-date on how we're keeping your information safe.

16. Effective Date of this Privacy Policy: March 20, 2022