

Privacy Policy

Effective: June __, 2024

At River Delta, Inc. (collectively referred to as “River Delta”, “we”, “us” or “our”), we respect your privacy and are committed to protecting it. This notice covers all personal information collected in the use of the Mezo Chain (“Mezo”), the Mezo website, www.mezo.org, and all of our other properties, products, and services (the “Services”). Your use of the Services is subject to this Privacy Policy as well as our Terms of Use. If our privacy practices differ from those explained in this policy, we will let you know at the time we ask for or collect your information.

Some pages on our websites may contain links to third-party websites. We do not endorse and have no control over the privacy practices or content of such websites. We recommend you carefully read the privacy policy of each site you visit, including ours.

We cover a lot of ground in this privacy policy. Use the links below to navigate to later sections of the privacy policy of interest to you.

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1. High Level Summary

- River Delta is an incorporated company based in the United States that operates mezo.org among other products and services. River Delta complies with American laws and regulations.
- Mezo is a censorship-resistant set of smart contracts deployed across various Layer 1 and Layer 2 chains.
- Mezo does not collect and store personal data, such as first name, last name, street address, date of birth, email address, or IP address, in connection with your use of the Services.
- Mezo collects non-identifiable data, such as public on-chain data, and limited off-chain data like device type, browser version, etc. This is to help drive production vision, not track users.
- If you specifically sign up to receive emails from us, we will store your email address to allow us to send you those emails, and we will associate your email address with your wallet address. We collect Telegram user names and email addresses from those who provide them in order to communicate about updates to the project. You can unsubscribe at any time by clicking the Unsubscribe button on our email.
- Mezo continues to explore methods to further protect consumers' privacy, such as opt-out prompts, migrating to privacy-centric tooling and deploying proxies to anonymize network traffic.
- Users are empowered to explore client-side privacy techniques and tools.
- Any material changes to privacy will be reflected in an updated privacy policy.

2. What Information We Collect

Privacy is central to everything we do at Mezo., and transparency is one of Mezo's values. Therefore, we aim to be transparent about what data we do collect. We collect digital wallet addresses to allow users to login to our system, and we collect Telegram User names and email addresses from those who provide them. Personal information, or personal data, means any information about an individual from which that person can be identified, such as your name or internet protocol (IP) address. It does not include data where the identity has been removed (anonymous data), which we can use for any purpose. When you interact with the Service, we may collect different kinds of data which we have grouped together as follows:

- **Publicly Available Blockchain Data.** When you connect your non-custodial blockchain wallet to the Services, we collect and log your publicly available blockchain address to learn more about your use for the Services and to screen your wallet for any prior illicit activity. We screen your wallet using intelligence provided by leading blockchain analytics providers. Note that blockchain addresses are publicly available data that are not created or assigned by us or any central party, and by themselves are not personally identifying.
- **Information From Tracking Technologies.** We and our third-party services providers may access and collect information from cookies, web beacons, and other similar technologies to provide and personalize the Services and features of the Service for you across sessions. For example, we may use this information to remember tokens you import, star, or add to your shopping bag. We may also use this information to learn about your preferences, your use of the Services, and our interactions with you. Information we collect from these technologies may include things such as browser type, referring/exit pages, operating system, device or

browser language, and other device information. We group and analyze these user journeys collectively, in the aggregate, to improve our product user experience.

- **Information From Other Sources.** We may receive information about your wallet address or transactions made through the Services from our service providers in order to comply with our legal obligations and prevent the use of our Services in connection with fraudulent or other illicit activities.
- **Survey or Usability Information.** If you participate in a survey or usability study with us, we will record any biographical information you directly provide to us, the responses you provide to us, and your interactions with the Services. For example, this may include your name, email, and job title. We will also record information about how you use our websites and our products and services.
- **Correspondence.** We will receive any communications and information you provide directly to us via email, customer support, social media, or another support channel (such as Twitter or Discord), or when you participate in any surveys or questionnaires. This will include information you provide to us for technical support and feedback information, as well as your preferences in receiving marketing from us and our third parties.
- **Biographical Information.** If you apply for a job with us, we collect all information provided through our Jobs forum, including name, email, phone, work and immigration status, and any other resume, cover letter, or free form text you include.
- **Information You Provide to Us.** If you specifically provide us with information including but not limited to your name, email address, Internet Protocol (IP) address or similar identifiers (username, alias, or Discord ID), we may use that information for the purposes described when you provided it to us. You do not need to provide us with any personal data to use the Services.
- **Transaction Information** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Device Information** includes the device's hardware information, operating system, platform information, browser type, language information, browser plug-in types.

We may also collect, use, and share aggregated data such as statistical or demographic data ("Aggregated Data") for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage information to calculate the percentage of users accessing our website. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Sensitive Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

3. Children's Data

We do not target our websites to minors, and we do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this website. If we learn we have collected or received personal information from a child under 18 without verification of parental

consent, we will delete that information. If you believe we might have any information from or about a child under 18 please contact us at contact@mezo.org.

4. How We Collect Your Information

We use different methods to collect information from and about you including through:

- **Direct interactions.** You may give us information about you by communicating with us. This includes information you provide when you send us an email, leave a post on our discord server, subscribe to our emails, leave reviews, or otherwise communicate with us.
- **Third-party or publicly available sources.** We may receive information about you from third parties, including, our affiliated companies, business partners, and service providers. We may also receive information about you from commercially available sources such as data aggregators or public databases or otherwise public information like social media profiles.
- **Automatic collection.** We may receive information as you interact with your website, apps, or emails, which may then give us automatic data collection through cookies, server logs, web beacons, and other similar technologies.

5. Cookies and Automatic Data Collection Technologies

Our websites may use automatic data collection technologies to distinguish you from other website users. This helps us deliver a better and more personalized service when you browse our website. It also allows us to improve our websites by enabling us to:

- Estimate our audience size and usage patterns.
- Store your preferences so we may customize our websites according to your individual interests.
- Recognize you when you return to our website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. For information about managing browser settings to refuse cookies, see [Your Rights and Choices](#).
- **Web Beacons, Pixel Tags, Clear Gifs.** Our website pages and emails may contain small transparent embedded images or objects known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count website page visitors or email readers, or to compile other similar statistics such as recording website content popularity or verifying system and server integrity. For information about managing web beacons, see [Your Rights and Choices](#).

Opt-out preference signals or Global Privacy Controls (GPC) provide consumers with a simple and easy-to-use method by which consumers interacting with us online can automatically exercise their opt-out of sale/sharing rights. We will process any opt-out preference signals that meet the following requirements:

- A signal that is in a format commonly used and recognized by businesses; and
- The technology or mechanism that sends the opt-out preference signal makes clear to the consumer that the use of the signal is meant to have the effect of opting the consumer out of

sale and sharing of their personal information. For example, such technology or mechanism may be an HTTP header field, JavaScript Object, or most commonly, a browser tool or extension that allows users to send the opt-out signal.

6. How We Use Your Personal Information

If you provide personal information through the features on our website, we will only use your personal information as the law allows. Examples of activities for which we may collect information, the type of data we collect, and our lawful basis for collecting that data are listed below.

Purpose/Activity	Type of data	Lawful basis for processing
To provide our Services	(a) Identity, contact, or profile information (b) Communication information (c) Financial information (d) Transaction information (e) Device information (f) Usage information (g) Demographic information and preferences (h) Improve our services	(a) Necessary for our legitimate interests (b) Necessary for our legitimate interests (c) Necessary for our legitimate interests (d) Necessary for our legitimate interests (e) Necessary for our legitimate interests (f) Necessary for our legitimate interests (g) Necessary for our legitimate interests (h) Necessary for our legitimate interests
To notify you about changes to our terms or privacy policy	(a) Identity, contact, or profile information (b) Communication information	(a) Necessary to comply with a legal obligation
To communicate with you about technical support and feedback or to provide you the information you request from us (including newsletters)	(a) Identity, contact or profile information (b) Communication information	(a) Necessary for our legitimate interests (b) Necessary for our legitimate interests
To communicate with you about joining our team	(a) Identity, contact, or profile information (b) Communication information	(a) Necessary for our legitimate interests (b) Necessary for our legitimate interests
To protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, contact, or profile information (b) Communication information (c) Usage information (d) Device information	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (d) Necessary for our legitimate interests

In addition, we may use your personal information for the following purposes:

- To carry out our obligations and enforce our rights.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use information that is not personal information for any purpose. For example, we may aggregate Usage information from many people in a way that does not identify any individuals to calculate the percentage of users accessing a feature on the website.

7. Disclosure of Your Personal Information

We may share non-personal information without restriction. We may share your personal information with:

- Anyone inside our organization, which includes our subsidiaries, affiliates, our ultimate holding company and its subsidiaries, and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To fulfill the purpose for which you provide it.
- For any other purposes that we disclose when you provide the information.
- With your express consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request.
- To protect the rights, property, or safety of our business, our employees, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection and credit risk reduction.
- To investigate suspected violations of any law, rule or regulation, or the terms or policies for our website.

8. Third-Party Links

Some content or applications on our websites may be served by third parties, content providers, and application providers including the following:

- **Third-party links.** Our websites may contain links to other sites, which we do not control. Those websites have their own privacy policies and terms, and we encourage you to read those terms before interacting with third-party sites.
- **User content.** Our websites may allow you to upload your own content to public areas of the website. Any information you submit becomes public information, and we do not control how others may use the content you submit. We are not responsible for uses that may violate our privacy policy, the law, or your intellectual property rights.

9. Retention

We will take reasonable steps to avoid collecting personal information that is not necessary. We will only retain your personal information for the period necessary to achieve purposes described in this privacy policy. Your express agreement may permit us to retain your personal information for a longer period. Furthermore, legal requirements may require us to retain portions or all of the personal information we hold for a longer period of time. When we are no longer required to retain your personal information, we will delete, erase, or de-identify your personal information as required by applicable law.

10. Your Rights and Choices

Your rights may vary depending on where you are located. We have created mechanisms to provide you with the following control over your information.

- **Marketing.** You may opt out of communications to your email or other contact channel from Mezo, including newsletters and/or promotions, using provided opt-out links, contacting us, or by choosing to never opt into such communications.
- **Product Usage.** You can opt out of data analytics by discontinuing the use of the Mezo chain and website.
- **Accessing, Updating and Deleting Your Information.** You can contact us at contact@mezo.org to request access to, correction of, or deletion of personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or negatively affect the information's accuracy. We cannot delete personal information, if any, that has been posted to any blockchain through your use of a smart contract.
- **Cookies and Automatic Data Collection Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. However, if you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.
- **California Residents.** If you are a California resident, you may have additional personal rights and choices with regard to your personal data. Please see Your California Privacy Rights for more information. California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. At this time, we do not engage in this type of disclosure.

- **EU Residents.** If you are in the European Economic Area, United Kingdom, or are otherwise subject to the General Data Protection Regulation or the UK GDPR, then this section applies to you. You have a right to:
 - o request access to your personal data, commonly known as a “data subject access request”, which allows you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
 - o Request a correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - o Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
 - o Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
 - o Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data’s accuracy.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
 - o Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
 - o Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
 - o We may make automated decisions about you based on your personal information that may affect your access or services provided to you. You have the right not to be subject the automated decision making so long as the decision is not necessary for the performance of the contract with you or required by legal obligation. If the decision making is necessary, you may contest the decision and request human intervention in the decision-making process.
 - o You also have a right to lodge a complaint with the relevant Data Protection Authority.

11. International Transfers

Mezo can be accessed globally, and we maintain the information collected and generated in the United States that may have privacy laws that offer different levels of protection from the privacy laws of where you live. If you visit our site or communicate with us, you consent to our collection, transfer, processing and use of your personal information in the United States. We will ensure that your personal information is adequately protected by this policy and the relevant legal and regulatory requirements.

If you are located in the EEA, we have put in place appropriate measures to comply with the laws and regulations to ensure that the transfer of personal data from the EEA to countries outside of the EEA provides an adequate level of data protection.

12. Data Security

The security of your personal information is very important to us. We use physical, electronic, and administrative safeguards designed to protect your personal information from loss, misuse and unauthorized access, use, alteration or disclosure. We will only retain your personal information for as long as reasonably necessary to fulfill the purpose of collecting it.

We also require our service providers and business partners to whom we disclose the information to do the same. When you use certain types of information, such as debit or credit card numbers, we encrypt the transmission of that information using secure socket layer technology (SSL). However, the Internet environment is not 100% secure, and we cannot guarantee that information we collect will never be accessed in an unauthorized way.

The safety and security of your information also depend on you. You are responsible for keeping your personal information confidential. We urge you to take care when providing information to social media accounts or discord servers, which any other visitors can view.

13. Changes to Our Privacy Policy

We will post any changes we may make to our privacy policy on this page. If the changes materially alter how we use or treat your information, we will notify you through a notice on the website home page. The date the privacy policy was last revised is identified at the top of the page.

14. Contact Us

If you have any comments or questions about our privacy policy, please contact us at contact@mezo.org.

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