Privacy Policy

YOUR PRIVACY IS VALUED

Individuals who access our decentralized fundraising platform on the Internet Computer blockchain ("Platform"), located at https://www.prodox.io, and any of our other websites, applications, or services that link to this Privacy Policy (collectively, the "Service") have their privacy well secured. This Privacy Policy (the "Policy") explains how we solicit, use, and share information from Service users. You agree to the terms and conditions of this Policy by consenting to it during account setup and by continuing to use the Service.

THE TYPE OF INFORMATION SOLICITED

When you use the Service, we gather all the information you give us. On the Service, you can furnish us with information in a variety of ways.

Personal Information:

You are required to supply us with your name, email address, phone number, physical address, country of residence, and cryptocurrency wallet address when you register as a user with us. In addition, you must authenticate your identity by providing a government-issued ID with your full name, date of birth, and tax number (or identification number), as well as an address proof indicating your current physical address and a selfie photo taken with your webcam or mobile phone.

We may additionally require specific details to establish your position as an accredited investor in order for you to participate in certain token sales and use our Platform as a User. For example, Users who wish to participate in a token offering as an individual, rather than on behalf of a corporation or trust, must provide their full name, tax number, phone number, address, date of birth, and, if the User is required to be an accredited investor, proof of required assets (such as an asset appraisal) or income (such as tax filings or pay slips).

We may require you to give more information at specific times. We may also ask Users to fill out a short survey on their interest in certain types of tokens and cryptocurrencies.

Projects that launch on our Platform and issue a blockchain-based cryptographic token ("Token Projects") may provide us with information about their Token Project and token offering, some of which will be made available to potential Users to help them decide whether or not to participate in such Token Projects.

<u>Financial Information:</u> When you use our Service to participate in any Token Projects, we may gather necessary financial information from you, such as your bank's routing number, account number, or wallet address.

<u>Usage information:</u> We may collect information about how you access and use our Service, as well as your actions on the Service, such as your interactions with other users, images or material you upload to the Service, comments, and posts you makein our public discussion forums.

Technical Data: On the devices, you use to access our Service, we may collect datasuch as your IP (internet protocol) address, ISP (internet service provider), web browser, the time the Service was accessed, which web pages were visited, operating system and platform, a mobile device-type identifier, and other technology. With your permission, we may also access your photo and camera roll, as well as Face ID.

<u>Communications:</u> When you contact us directly, we may obtain extra information about you. When you contact us by email, we will get your email address, the contents of any message or attachments from you, and any other information you have submitted.

HOW DO WE USE THE INFORMATION WE COLLECT?

- Verifying the identity and accreditation status of Users, which may include conducting a soft pull on your credit history, and to facilitate participation in listed tokens.
- Operating, maintaining, enhancing and providing features of the Service, providing services and information that you request, responding to comments and questions, and otherwise providing support to users.
- Understanding and analyzing the usage trends and preferences of our users, improving the Service, developing new products, services, features, and functionality.
- Contacting you for administrative or informational purposes, including by providing customer service or sending communications, including changes to our terms, conditions, and policies.
- For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest.
- Personalizing your experience on the Service by presenting tailored content.
- We may aggregate data collected through the Service and may use and disclose it for any purpose.
- For our business purposes, such as audits, security, compliance with applicable laws and regulations, fraud monitoring and prevention.
- Complying with legal and regulatory requirements.
- Protecting our interests, enforcing our Terms of Use or other legal rights.

WHEN AND WITH WHOM DO WE SHARE THE INFORMATION, WE COLLECT?

Your information will not be sold to or shared with third parties except as described in this Policy:

- Companies in our group or our affiliates in order to provide you with the services.
- Token Projects may have information from and about you to facilitate User directed participation and to communicate with you independently.
- Our third-party service providers who provide services such as data storage, website hosting, data analysis, customer service, email delivery, auditing, and other services.
- Acquirer, successor, or assignee, whether potential or actual, as part of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in bankruptcy or similar proceedings).
- If required to do so by law or in the good faith belief that such action is appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our subsidiaries; (f) to protect our rights, privacy, safety or property, and/or that of our subsidiaries, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Third-party analytics providers may also be used to analyze and provide us with information about your use of the Service. These analytics service providers may use the Service to access their own cookies, pixel tags, and other similar technologies, and they may also collect or have access to your information over time and across various websites.

For instance, we gather and process certain analytics data using Google Analytics. The extra privacy settings offered by Google are detailed at https://www.google.com/policies/privacy/partners.

Unless we are forbidden from doing so by current law, we may use and disclose aggregate information that does not identify or otherwise relate to an individual for any reason.

THIRD-PARTY SERVICES

Third-party service providers may be used to store and maintain all of your Personal Information. We will, however, make reasonable commercial efforts to guarantee that these providers perform their obligations and services with reasonable care and competence. Occasionally, third-party content may be displayed on the Service. This type of content may use cookies, web beacons, or other techniques to collect data about your viewing of and/or interaction with third-party content.

You should be aware that, when transferring information over the internet, there is always some risk involved. While we make every effort to safeguard your Personal Information, we cannot ensure that any Personal Information or other content you transmit using the service will absolutely be secured. You acknowledge that you do so at your own risk.

Please be aware that we have no control over, and will not be liable for, the Personal Information acquired and processed by third parties, its safekeeping or the breach, or any other act or omission relating to it and their compliance with relevant privacy laws or regulations. We recommend that you read the privacy policies of any such third parties and exercise caution.

HOW WE PROTECT YOUR PERSONAL INFORMATION

You acknowledge that no data transmission over the internet is completely safe. We thus cannot guarantee the security of any information you send us. Nevertheless, we do use certain physical, organizational, and technical safeguards that are designed to maintain the integrity and security of information and we have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Information. Your personal information will be kept on secure servers and will not be made available to the general public.

Access to your Personal Information will only be granted to employees or partners who require it in order to carry out the processing purposes described above. However, we use third-party service providers to store your Personal Information, as indicated above. We cannot guarantee the security or privacy of information stored with our service providers, but we will use reasonable commercial efforts to ensure that any such third-party service provider has in place certain physical, organizational, and technical safeguards designed to protect the integrity and security of your Personal Information.

You acknowledge to prevent your account from unauthorized access by properly safeguarding your password (for example, by logging out after you have finished accessing your account). You will be solely responsible for maintaining the confidentiality of your password and for any and all uses of your password and account, including any unauthorized use. While we strive to keep your information secure, we cannot guarantee it. No passwords of users are stored as an added layer of security.

Please keep in mind that no security mechanism is perfect or impenetrable, so we cannot and do not guarantee the security of your information. While we make every effort to safeguard your Personal Information, we cannot guarantee or assure the security or privacy of any Personal Information or other materials you transmit through the service, and you do so at your own risk. You acknowledge that your account credentials are secure and under your control, and that you do not share your password with anybody. Furthermore, we do provide two-factor authentication to our users in order to protect their accounts.

HOW LONG DO WE KEEP YOUR INFORMATION

Your information will be kept by our third-party storage service providers for as long as it is required to deliver our Services and to comply with our legal obligations (including those pertaining to financial transactions), resolve disputes, and enforce our policies. Retention periods will be determined based on (1) the type of data obtained, (2) the purpose for which it was obtained, and (3) the necessity to discardobsolete, unneeded data as soon as possible.

YOUR RIGHTS

You, as a user, have the right to refuse to share certain information with us, in which case we may be unable to offer you certain features and functions of the Services. We will occasionally send marketing emails to our users, including promotional materials about our Service or Token Projects' services. If you do not wish to receive such emails from us in the future, you may unsubscribe using the "unsubscribe" link included in each such email. Even if you unsubscribe from our marketing materials, we may still send you Service-related updates and notifications, as well as respond to your questions and feedback.

NO USE OF SERVICE BY MINORS

Individuals under the age of eighteen (18) are neither permitted to use the Service nor provide Personal Information through the Service.

CROSS-BORDER DATA TRANSFER

Your information may be stored and processed outside of your country of residence, as well as around the globe. By using the Service, you grant consent to the transfer of information to countries outside of your home country, which may have different data protection laws.

UPDATES TO THIS PRIVACY POLICY

We reserve the right to make changes to this Policy. The "Last Updated" date at the bottom of this page represents the most recent revision of this Policy. If we make significant changes to the Service, we will notify you via the Service, email, or other means. Our website will always display the most recent version. We recommend that you review this Policy on a regular basis to keep yourself informed about our privacy policies. Your continued use of our Service after such updates become effective is deemed your acceptance to be bound by the revised Policy.

CONTACT US

If you have any issues concerning this Policy, please contact us using the "Email Us: support@prodox.io"

