

PRIVACY POLICY

Last Updated: February 24, 2023

1. Introduction and Overview.

Metamagnet, and its subsidiaries and affiliates (“XPLA”, “we”, “our”, and/or “us”), value the privacy of individuals who use our website www.xpla.io (the “Site”). This privacy policy (“Privacy Policy”) describes how XPLA collects, uses, and shares information about users and their rights and choices regarding such information. If you have any questions or wish to exercise your rights and options, please contact us in the “Contact Us” section.

2. Information Collection.

XPLA collects certain personal information from you when you use the Site. This information is collected and may be stored electronically by us. This information may be provided to us voluntarily by you, collected automatically by us from you, or provided to us from third-party sources as further explained in this Section 2.

A. Information You Provide.

We collect information about you when you use the Site, including information you provide when you access the Site or use the “Contact Us” feature on the Site to email us. Specifically, we collect any content within any messages or emails you send to us by email using the Site’s “Contact Us” feature.

B. Information Collected Automatically.

We automatically collect information when you use the Site. The categories of information we automatically collect include:

- **Device Data**, including data about the type of device or browser you use, your device’s operating software, your internet service provider, your device’s regional and language settings, and device identifiers such as internet protocol (IP) address.
- **Location Data**, including imprecise location data (such as location derived from your IP or data that indicates a city or postal code).
- **Cookies**, which are small data files stored on your device that act as a unique tag to identify your browser. There are two types of cookies: session cookies and persistent cookies. Session cookies can make it easier to navigate websites and expire when you close your browser. Persistent cookies can help personalize your experience, remember your preferences, and support security features. Persistent cookies may remain on your device for extended periods of time, and generally may be controlled through your browser settings. To learn more about how we use cookies, please visit our [Cookie Policy](#).
- **Information from Other Sources.**

We also collect information from other sources, including partners who offer applications and other services in the XPLA Ecosystem, and publicly available sources, including data in the public domain, to respond to your requests, at your direction, for security and safety, or as may be required by law.

3. Use of Information

We collect and use information for business purposes in accordance with the practices described in this Privacy Policy. Our business purposes for collecting and using information include:

- Operate and manage the Site.
- Perform services requested by you, such as responding to your comments, questions, and requests, and providing customer service.
- Sending you technical notices, updates, security alerts, information regarding changes to our policies, and support and administrative messages.
- Preventing and addressing fraud, breach of policies or terms, and threats or harm.
- Monitoring and analyzing trends, usage, and activities.
- To facilitate the connection of authorized third-party services or applications.
- Conducting research, including focus groups and surveys.
- Improving XPLA's Site and any related services.
- Any purpose at your direction or with your consent.

We may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we use information about you, please see the "Your Rights and Choices" section below.

4. Sharing of Information

We share information we collect in accordance with the practices described in this Privacy Policy. The types of entities we may share information with include the following:

- **Service Providers.** We share information with entities that process information on our behalf for our business purposes, including to support the Site. Service providers assist us with data analytics, marketing and advertising, website hosting, and technical support. We contractually prohibit service providers from retaining, using, or disclosing information about you for any purpose other than performing services for us, although we may permit them to use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law.

- **Affiliates.** We share information with our related entities including our parent and sister companies for business purposes such as customer support, marketing, product and content development, technical operations, and providing the Site.
- **Ecosystem Partners.** We share information with Ecosystem Partners at your direction or with consent, or as necessary to fulfill services you have requested.
- **Merger or Acquisition.** We share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition, business combination of all or any portion of our business or assets, change of control, or a transfer of all or a portion of our business or assets to another third party (including in the case of any bankruptcy proceeding).
- **As Required by Law or for Security and Safety.** We share information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We also share information to protect the rights, property, life, health, security and safety of us, the Services or anyone else.
- **Other Third Parties.** We share information collected pursuant to this Privacy Policy with other third parties at your request or direction or with your consent.

We may also share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the “Your Rights and Choices” section below.

5. **Links to Third Party Services and Sites.**

The Site includes links that hyperlink to websites, platforms, and other services not operated or controlled by us. Please note that when you interact with other entities, including when you leave the Site, those entities may independently collect information about you and solicit information from you. The information collected and stored by those entities remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and where they store information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

6. **Your Rights and Choices.**

A. Account Information

You may access, update, or remove certain information that you have provided to us through your account by visiting your account settings or sending an email to the email address set out in the “Contact Us” section below. We may require additional information from you to allow us to confirm your identity. Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

B. Cookies and Technology Choices.

- **Cookies.** We use Google Analytics to collect and process certain analytics data on our behalf. You can opt out of Google Analytics by installing Google's browser plug-in located here. You can disable non-essential cookies collected through the Site through the cookie settings page. Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.
- **Do Not Track.** Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to "Do Not Track" signals.

C. Communications.

- **E-mails.** You can opt-out of receiving any promotional emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link or emailing us with the word UNSUBSCRIBE in the subject field of the email. Please note that you may continue to receive non-promotional emails, such as those in response to your customer support requests made through the Site.

7. Children.

The Site is not directed towards, nor designed to attract the attention of, children. We do not knowingly collect or maintain personal information from any person under the age of thirteen. If you are a parent or guardian and you believe we have collected information from your child, please contact us via e-mail.

8. Data Security.

XPLA uses reasonable security measures designed to prevent unauthorized intrusion into the Services and the alteration, acquisition or misuse of user information. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you, collected from you, or submitted by you.

9. International Transfer.

We and our service providers may transfer your personal information to, or store or access it in, Singapore or other jurisdictions. If you choose to use our Site from the European Union or other regions with laws governing data collection and use that may differ, then please note that you are transferring your information outside of those regions to Singapore and other jurisdictions for storage and processing. Also, we may transfer your data from Singapore or elsewhere to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. By providing any information on or through the Site, you agree to such transfer, storage, and processing.

10. Changes to this Privacy Policy.

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we process information, we will provide you with notice in the application and via email in accordance with applicable legal requirements.

If you have any questions, comments, or concerns about our processing activities or this Privacy Policy, please contact us via e-mail.