

ReHold Privacy Policy

Last modified: January 24, 2023

This Privacy Policy (the “Policy”) explains how ReHold Ltd. (“ReHold”, the “Company”, “we”, “us” or “our”) collects, uses, and shares data in connection with the ReHold web app (app.rehold.io), rehold.io website and all of our other properties, products, and services (the “Services”). Your use of the Services is subject to this Policy as well as our Terms of Service.

High Level Summary

- ReHold is an incorporated company based in the Seychelles that operates <https://app.rehold.io/> among other products and services. ReHold complies with Seychelles laws and regulations.
- ReHold Protocol is a censorship-resistant set of smart contracts deployed across various Layer 1 and Layer 2 chains. It is not governed by ReHold.
- ReHold **does not** collect and store personal data, such as first name, last name, street address, date of birth.
- ReHold 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.
- ReHold 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.

Data We Collect

Privacy is a very important thing for our Company. We are transparent about what little data we do collect. We **do not** collect and store personal data, such as your name or birthday. When you interact with the Services, we collect only:

- **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 of 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 localStorage and other tracking technologies.** We and our third-party services providers may access and collect information from localStorage, mobile deviceID, cookies, web beacons, and other similar technologies to provide and

personalize the Services and features of the Services for you across sessions. For example, we may use this information to remember tokens you import, star, or add to your favorites. 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 (for example, your name, email, and job title), the responses you provide to us, and your interactions with the 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.

How We Use Data

We use the data we collect in accordance with your instructions, including any applicable terms in our Terms of Service, and as required by law. We may also use data for the following purposes:

- **Providing the Services.** We use the data we collect to provide, maintain, customize and improve our Services and features of our Services.
- **Customer support.** We may use information to provide customer support for and answer inquiries about the Services.
- **Safety and security.** We may use data to protect against, investigate, and stop fraudulent, unauthorized, or illegal activity. We may also use it to address security risks, solve potential security issues such as bugs, enforce our agreements, and protect our users and Company.
- **Legal compliance.** We may use the information we collect as needed or requested by regulators, government entities, and law enforcement to comply with applicable laws and regulations.
- **Aggregated data.** We may use some of the information we collect or access to compile aggregated data that helps us learn more about how users use the Services and where we can improve your experience.

How We Share Data

We may share or disclose the data we collect:

- **With service providers.** We may share your information with our service providers and vendors to assist us in providing, delivering, and improving the Services. For example, we may share your wallet address with service providers like Infura and Cloudflare to provide technical infrastructure services, your wallet address with blockchain analytics providers to detect, prevent, and mitigate financial crime and other illicit or harmful activities, and your activity on our social media pages with our analytics provider to learn more about you interact with us and the Services.
- **To comply with our legal obligations.** We may share your data in the course of litigation, regulatory proceedings, compliance measures, and when compelled by subpoena, court order, or other legal procedure. We may also share data when we believe it is necessary to prevent harm to our users, our Company, or others, and to enforce our agreements and policies, including our Terms of Service.
- **Safety and Security.** We may share data to protect against, investigate, and stop fraudulent, unauthorized, or illegal activity. We may also use it to address security risks, solve potential security issues such as bugs, enforce our agreements, and protect our users, Company, and ecosystem.
- **Business changes.** We may transfer or share data to another entity in the event of a merger, acquisition, bankruptcy.
- **With your consent.** We may share your information any other time you provide us with your consent to do so.

We do not share your information with any third parties for any marketing purposes whatsoever.

Third Party Cookies

We use services provided by Mixpanel that use tracking technology such as cookies, deviceID, and localStorage, to collect information about your use of the Services and our interactions with you. You can opt out of having your online activity and device data collected through these third-party services, including by:

- Blocking cookies in your browser by following the instructions in your browser settings. For more information about cookies, including how to see the cookies on your device, manage them, and delete them, visit www.allaboutcookies.org.
- Blocking or limiting the use of your advertising ID on your mobile device through the device settings.
- Using privacy plug-ins or browsers. Certain browsers and browser extensions can be configured to block third-party cookies and trackers.
- Using advertising industry opt-out tools on each device or browser where you use the Services, available at <http://optout.aboutads.info> and <http://optout.networkadvertising.org>.

Security

We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect data from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you. You are responsible for all of your activity on the Services, including the security of your blockchain network addresses, cryptocurrency wallets, and their cryptographic keys.

Age Requirements

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at support@rehold.io.

Deletion Data

Based on the laws of some countries, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request to support@rehold.io. We will respond to your request within 30 days.

Disclosures for European Union Data Subjects

We process personal data for the purposes described in the section titled "How We Use Data" above. Our bases for processing your data include: (i) you have given consent to the process to us or our service provides for one or more specific purposes; (ii) processing is necessary for the performance of a contract with you; (iii) processing is necessary for compliance with a legal obligation; and/or (iv) processing is necessary for the purposes of the legitimate interested pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests.

Your rights under the General Data Protection Regulations ("GDPR") include the right to (i) request access and obtain a copy of your personal data, (ii) request rectification or erasure of your personal data, (iii) object to or restrict the processing of your personal data; and (iv) request portability of your personal data. Additionally, you may withdraw your consent to our collection at any time. Nevertheless, we cannot edit or delete information that is stored on a particular blockchain. Information such as your transaction data, blockchain wallet address, and assets held by your address that may be related to the data we collect is beyond our control. To exercise any of your rights under the GDPR, please contact us at support@rehold.io. We may require additional information from you to process your request. Please note that we may

retain information as necessary to fulfill the purpose for which it was collected and may continue to do so even after a data subject request in accordance with our legitimate interests, including to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

Changes to this Policy

If we make material changes to this Policy, we will notify you via the Services. Nevertheless, your continued use of the Services reflects your periodic review of this Policy and other Company terms, and indicates your consent to them.

Contact Us

If you have any questions about this Policy or how we collect, use, or share your information, please contact us at support@rehold.io.