

## PRIVACY POLICY

Last update: 12/17/2024

This Privacy Policy ("Policy") outlines our privacy practices related to your use of our online software service, which is accessible via a mobile application and a browser-based service owned and operated by Go Defi Corp. ("GoD Corp," "we," "us," or "our"). This Policy covers the services and products available through our mobile application and our website at <https://godefi.me> ("Site"), as well as any other means of access ("Services"). Terms used in this Policy have the meanings assigned to them in our Terms of Use ("Terms" or "Terms of Use"), unless otherwise specified herein. This Privacy Policy also serves as a Collection Notice.

This Policy outlines our practices for collecting, sharing, and disseminating information in connection with the Site, Wallet, and our other interactive services and products (collectively, the "Company Platforms" or "Platforms"). Please remember that your use of the Company Platforms is also subject to our Terms of Use. This Policy also applies to Personal Information you provide to us in other contexts (e.g., through a business relationship not managed through the Company Platforms), unless otherwise defined by applicable law or a parties' agreement.

By using the Platforms, you agree that this Policy is an integral part of our Terms. If you do not agree to any provision of this Policy or do not accept its terms, you must not access the Platforms or use our Services.

We are committed to maintaining the privacy and security of your Personal Information, recognizing that such information may be particularly sensitive. We respect the privacy of all users of our Platforms.

### **Interpretation**

All definitions referenced within this Policy shall be interpreted in accordance with the definitions provided in the Terms of Use, unless otherwise expressly provided. In the event of any discrepancy or ambiguity between the definitions outlined in this Policy and those articulated in the Terms of Use, the definitions set forth in the Terms of Use shall prevail.

### **Information we collect**

"Personal Information", including the data mentioned in this section, refers to the data we gather through your use of our Wallet, a non-custodial digital asset software.

Wallet is a non-custodial digital asset software, meaning we do not maintain customer accounts. As such, you are not required to provide personal data to use Wallet.

Please note that we will never ask you to share your private keys or wallet seed. Do not trust anyone or any site that requests this information from you.

Be aware that your blockchain transactions may be transmitted through servers or nodes and will be publicly accessible due to the inherently transparent nature of distributed ledger systems.

We process personal data both manually and by automated means. Automated processing of personal data occurs primarily for contract performance and service delivery. We may collect, store, and use certain information automatically, such as statistical data, whenever you visit the Platforms or use Wallet.

We may gather limited information about you from your devices or other sources, as detailed below.

- (a) Information you create through the Application, such as public wallet addresses
- (b) Technical information, including the Internet protocol (IP) address used to connect your device to the internet, time zone settings;
- (c) Information about your interactions with the Platforms, including the pages and content you view and the dates and times of your use;
- (d) The type of browser software and the operating system you are using;
- (e) Any other non-personally identifiable information.

### **Children's data**

The Platforms are not directed to direct use by children, and we don't knowingly collect Personal Information from children under the age of 14 unless such data is provided by their parents or lawful guardians. If you believe that a child under the age of 14 has given us Personal Information without his/her parents' or lawful guardians' permission, please contact us.

### **How we use your information**

We use your information for the following purposes:

#### Providing with Services

We use your information to provide you with the Services, an intuitive, useful, efficient, and worthwhile experience on our Platforms. To do this, we use your information to: process and complete transactions, and send you related information, including confirmations, technical notices, updates, security alerts, respond to your inquiries and fulfill your requests; communicate with you and collect feedback about your experience with us; send administrative information, for example information regarding transactions and the Platforms and changes to our Terms; facilitate additional services and programs with third parties; personalize your experience of the Application such as identifying you as a repeat visitor.

#### Maintaining Safety and Security, Improving the Platforms

We are always working to improve your experience and provide you with new and helpful features. To do this, we use your information to: understand and analyze how you use our Platforms, perform research, testing, and analysis; develop new products, services, features, functionality, and partnerships; authenticate users; find and prevent fraud; and block and remove unsafe or fraudulent users from the Platforms; prevent, find, and resolve software or hardware bugs and issues; and monitor and improve our operations and processes, including security practices, algorithms, and other modeling.

#### Customer Support

We work hard to provide the best experience possible, including supporting you when you need it. To do this, we use your Personal Information to: investigate and assist you in resolving

questions or issues you have regarding the Platforms; and provide you support or respond to you.

#### Compliance and Responding to Legal Proceedings

Sometimes the law, government entities, or other regulatory bodies impose demands and obligations on us with respect to the Services we seek to provide. In such a circumstance, we may use your information to respond to those demands or obligations. We also collect, use and process your information as to be necessary or 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; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

#### Building and maintaining our community

We work to be a positive part of the community. We may use your information to: communicate with you about events, promotions, elections, and campaigns; personalize and provide content, experiences, communications, and advertising to promote and grow the Platforms. We may also use your information to deliver advertisements and marketing communications to you that we believe may be of interest. Marketing communications that you receive from us may include (i) advertisements for the Services, and (ii) advertisements for other goods or services.

#### **Legal basis for processing your personal information**

Although the Platforms are not intended to be used by individuals residing in the European Union; are not advertised or directed towards individuals residing in the European Union, we make good faith efforts to comply with the European Union General Data Protection Regulation ("GDPR"). We fully protect the subject's personal data from misuse in accordance with applicable law, in particular while respecting the principles and rules set out in the Regulation (EU) 2016/679 of the European Parliament and of the Council, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). We process the personal data on the basis of the compliance with a legal obligation, performance of a contract, legitimate interests of the controller, and on the basis of consent of the data subject.

We are a controller of your personal data. This means that we collect, store and use (and otherwise process) your personal data in pursuance of its business (the purposes for which data are processed are described in more detail herein), which consists primarily of the provision of the Services, educational or social events.

#### **Sharing of information**

We treat all your Personal Information strictly confidentially, and we do not sell, publish, or otherwise share it with any third parties, unless specified otherwise in our Terms, and unless we need to share some of your information with our affiliates, your contracting parties, payment processor, web-hosting, website-related consulting and monitoring, data analysis, information technology service provider or other third-party service providers for purposes of providing the

Services to you. You acknowledge and agree that we may disclose your Personal Information to enable third parties for the legitimate purposes specified above.

You acknowledge and agree that we may disclose your Personal Information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to: (a) comply with a current judicial proceeding, a court order or legal process served on us, (b) enforce our Terms; or (c) protect our rights, property or personal safety of our company, its members, agents, employees, users, and the public.

In particular, we may disclose your Personal Information to third parties such as:

Data processors (including banking partners, technology providers, customer support center). We do our best to select the most reliable service providers (data processors) that provide sufficient guarantees to implement appropriate technical and organizational security measures to protect your Personal Information. To do so, we concluded appropriate data processing agreements with the service providers and shall remain responsible for their actions in respect of the processing of your Personal Information.

Third parties. Sometimes we share your Personal Information with third parties who act as independent data controllers of your Personal Information. We do so only if required under the applicable law (e.g., auditors, national regulators or other authorities), when we need to protect your legal rights (e.g. disclosing Personal Data to attorneys or debt collection agencies) due to our legitimate interest for the performance of an agreement, or with the your consent.

Acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets. In such a case, we make sure that your rights and conditions when the data may be processed as a data subject shall not be decreased.

Your representatives, advisers, and other third parties you have contacted regarding the Service or which you have authorized to interact with us on your behalf. Please note that we consider such authorization as your consent and therefore your request for such an activity must be present to us in a written form.

### **Cross-border information transfer**

Sometimes, it is necessary for us to transfer your personal data to countries other than your own. These countries may have data protection regulations that differ from those in your country. When such data transfers occur, we ensure compliance with applicable data protection laws related to such transfers. In certain situations, we may also be obligated to disclose personal data in response to lawful requests from officials, such as law enforcement or security authorities.

Such transfers of your information take place, for example:

- (a) Necessity for the performance of Services;
- (b) Compliance with applicable laws;
- (c) Adherence to your instructions or consent;
- (d) Involvement of third parties processing data on our behalf, where staff may be performing technical support, order processing, or other support services.

For data transfers mandated by applicable law, we employ one or more of the following mechanisms:

- (a) Transfers to countries or recipients recognized as providing an adequate level of protection for personal data under applicable law;
- (b) Utilization of EU Standard Contractual Clauses approved by the European Commission and the UK International Data Transfer Addendum issued by the Information Commissioner's Office;
- (c) Other lawful methods available to us under applicable law.

In cases where third parties process data on our behalf, such as staff working outside the European Economic Area (EEA), we ensure that adequate safeguards are in place to protect your data. These safeguards may include approval by the European Commission as providing an adequate level of data protection or implementation of appropriate safeguards corresponding to EU data protection standards.

We are committed to taking all necessary steps to ensure the security of your data and to comply with applicable data protection laws and regulations.

### **Your rights and choices regarding your data**

As explained below, we provide ways to exercise your rights to your Personal Information. You may ask us to take the following actions in relation to your Personal Information that we hold:

#### Right to non-discrimination

We cannot deny Services, charge you a different price, or provide a different level or quality of the Services just because you exercised your rights under the relevant Data Protection Law. However, if you refuse to provide your Personal Information to us or ask us to delete your Personal Information, and that Personal Information is necessary to provide you with the Services, we may not be able to complete the relevant transaction or provide certain Services.

#### Opt-out

You have the right to opt out of certain uses of your Personal Information. You may contact us at any time to withdraw any consent you have previously provided for the processing of your information or to prevent the crossborder transfer of your information. This will apply to future processing and will not affect the lawfulness of processing based on your previous consent. Please note that opting out may affect your ability to use some parts of our Services or Platforms. You may also unsubscribe from our promotional emails through the link provided in those emails. However, you will still receive administrative messages from us even after opting out of marketing communications.

#### Right to delete

In most circumstances, we will securely delete or dispose of Personal Information when we no longer need it for our legitimate business purposes outlined in this Policy. Our approach to retention is outlined in our records retention schedule.

You may request that we delete Personal Information we collected from you and to tell our service providers to do the same. However, there are many exceptions that allow us to keep your Personal Information.

There are exceptions to the right to delete. Common reasons why we may keep your Personal Information include:

- (a) We cannot verify your request;

- (b) To complete your transaction, provide a reasonably anticipated Service, or for certain warranty and product recall purposes;
- (c) For certain business security practices;
- (d) For certain internal uses that are compatible with reasonable consumer expectations or the context in which the information was provided;
- (e) To comply with legal obligations, exercise legal claims or rights, or defend legal claims;
- (f) If the Personal Information is certain consumer credit reporting information, or other types of information exempt by law.

#### Right to data portability

If you wish us to transfer to a third party Personal Information we are processing about you electronically on the basis of a contract or your consent, you may exercise your right to data portability. In the event the exercise of this right adversely affected the rights and freedoms of others, we will not be able to act on your request.

#### Right to object

The right to object to the processing of Personal Information for the performance of a task carried out in the public interest or in the exercise of official authority, or for protection of the Company's legitimate interests. Unless we demonstrate that compelling legitimate grounds for the processing exist which override the interests, rights and freedoms of the data subject, the processing will be discontinued without undue delay.

#### Request to know/ to correct / to restrict/ to delete

Make sure you submit your request to know/ to correct / to restrict or to delete through one of our designated methods specified in the "Contact" section below. If our designated method of submitting request is not working, notify us in writing and consider submitting your request through another designated method if possible.

We must respond to your request within 45 calendar days. We can extend that deadline by another 45 days (90 days total) if we notify you of it. If you submitted a request and have not received any response within the timeline, check this Policy to make sure you submitted your request through the designated way.

We must verify that the person making a request is the user about whom we have Personal Information. We may need to ask you for additional information for verification purposes. If we ask for Personal Information to verify your identity, we can only use that information for this verification purpose.

If you do not know why we denied your request, follow up with us to ask us for our reasons.

If you submit a request to our service provider instead of us, our service provider may deny the request. You must submit your request to us.

Where requests to exercise the above rights repetitive or manifestly unfounded, Company may either charge a reasonable fee for the exercise of the relevant right, or refuse to act on the request. If this is the case, you will be informed accordingly.

#### Other ways of rights exercise

Cookie Tracking. You can modify your cookie settings on your browser, but if you delete or choose not to accept our cookies, you may be missing out on certain features of the Platforms.

**Do Not Track.** Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services that you do not want them to track your online activities. The Platforms may not support Do Not Track requests.

**Right to Delete.** If you would like to delete your account at the Platforms, please, visit our Platforms. In some cases, we will be unable to delete your account, such as if there is an issue with your account related to trust, safety, or fraud. When we delete your account, we may retain certain information for legitimate business purposes or to comply with legal or regulatory obligations. For example, we may retain your information to resolve open payment claims, or we may be obligated to retain your information as part of an open legal claim. When we retain such data, we do so in ways designed to prevent its use for other purposes. In most circumstances, we will securely delete or dispose of Personal Information when we no longer need it for our legitimate business purposes outlined in this Policy.

### **Retention period**

We retain your Personal Information within the period of your using the Platforms, providing you the Services and then within the period reasonably necessary for the disclosed purpose, unless applicable laws state otherwise. This means we keep your profile information for as long as you use the Services. We retain transactional information, such as payments, for at least seven years to ensure we can perform legitimate business functions, such as accounting for tax obligations. We take reasonable and appropriate measures designed to protect Personal Information, but no security measures can be 100% effective, and we cannot guarantee the security of your information, including against unauthorized intrusions or acts by third parties.

### **Third-party tools and services**

The Platforms may contain links to third-party websites, plug-ins and applications (collectively, hereinafter “Links”). Clicking Links may allow third parties to collect or share data about you. We do not control these third-party tools or applications, and are not responsible for their privacy statements, policies, or terms. When you leave the Platforms, we encourage you to read the privacy notices, policies, and terms of every other site which you visit. Links may or may not have our authorization, and we may block any Links to or from the Platforms. Your use of third-party Links is at your own risk. You acknowledge and agree that we shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with the use of or reliance on any such content, goods or services available on or through any such Links.

### **Changes and updates to this Policy**

We may update this Policy from time to time as the Platforms changes and privacy law evolves. If we update it, we will do so online, and if we make material changes, we will let you know through the Platforms or by some other method of communication like email. When you use the Platforms, you are agreeing to the most recent terms of this Policy.

### **Entire agreement**

This Policy hereby incorporates by reference any additional terms that we post on the Platforms (including, without limitation, our Terms of Use) and, except as otherwise expressly stated herein, this Policy is the entire agreement between you and us relating to the subject matter herein and supersedes any and all prior or contemporaneous written or oral agreements or understandings between you and us relating to such subject matter.

### **Contact us**

If you have any questions or comments about this Policy or our privacy practices, please contact us (submit your request) via e-mail at [support@godefi.me](mailto:support@godefi.me). If you have any questions about these Terms or the Services, please contact us at [support@godefi.me](mailto:support@godefi.me).

You may also make a complaint to your local data protection authority.