

PRIVACY POLICY

1. OVERVIEW

This Privacy Policy (this “Policy”) familiarizes you with our privacy practices connected to your use of our online interfaces and properties (e.g., websites and Telegram integrated utility accessible at <https://t.me/xrocket> (“xRocket”) owned and controlled by xRocket, a limited liability company duly incorporated and existing under the laws of the Republic of Panama (“XROCKET CORP”, “Company”, “we”, “us” or “our”), and services and products made available to you through xRocket and our website <https://xrocket.exchange/> (“Website”) and in any other way (“Services”). Terms used in this Policy have the meaning prescribed to them under our Terms of use (“Terms” or “Terms of Use”) unless otherwise provided herein. This Privacy Policy also functions as a Collection Notice.

This Policy discloses our information collection, share and dissemination practices in connection with the Website and xRocket, features and other our 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 addresses Personal Information that you provide to us in other contexts (e.g., through a business relationship not handled through the Company Platforms), unless otherwise is defined by applicable law or parties’ agreement.

By using the Platforms, you agree with this Policy being an integral part of our Terms. Please, be aware that if you do not agree to any provision of this Policy or do not accept its terms, you must not access the Platforms and/or use our Services.

2. 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.

3. OUR COMMITMENT

We are committed to maintaining the privacy and security of your Personal Information, and we appreciate that information may be particularly sensitive. Company respects the privacy of all users of our Platforms.

4. INFORMATION WE COLLECT AND PROCESS

We may collect through the Platforms, from other sources like Third-Party Tools, and optional programs in which you participate, store, use, process, share and disclose your personal information and sensitive personal information (“**Personal Information**”), and information about your activities and devices, particularly:

- (a) Telegram information: your Telegram username, profile name, URL-photo, Telegram ID, and phone number;
- (b) Financial information: crypto payment information and other information that you provide voluntarily;
- (c) Identification information: your name, date of birth, address, telephone number, and identification documentation (e.g., proof of identity and nationality);
- (d) Details of the transactions you carry out when using the Services, including wallet addresses, transaction IDs, timestamps of transactions or events, transaction amounts, and digital signatures;
- (e) Technical information, including the Internet protocol (IP) address used to connect your device to the internet, your login information, time zone settings;
- (f) Geolocation information: precise geolocation information (including GPS and WiFi data), IP address, the browser used, version of operating system, identity of carrier and manufacturer, radio type (such as 4G), preferences and settings (such as preferred language), application installations, device identifiers, advertising identifiers, and push notification tokens;
- (g) Information about your interactions with the Platforms, including the pages and content you view and the dates and times of your use;
- (h) Any other personal information you may voluntarily disclose on the Platforms from time to time;
- (i) Contents of the messages or attachments you send us.

We process personal data both manually and by automated means. The processing of personal data by automated means takes place in particular for the purposes of performance of a contract and offering Services. We may collect, store and use certain information by automated means, such as statistical information whenever you visit the Website or xRocket.

5. COOKIES, ANALYTICS, AND THIRD-PARTY TECHNOLOGIES

We collect information through the use of “cookies”, tracking pixels, data analytics tools like Google Analytics, SDKs, and other third-party technologies to understand how you navigate through the Website and interact with advertisements, to tailor our social media advertising, to make your experience with us safer, to learn what content is popular, to improve your

website experience, to serve you better ads on other sites, and to save your preferences. Those cookies are set by us and called first-party cookies. We also use third-party cookies – which are cookies from a domain different than the domain of the website you are visiting – for our advertising and marketing efforts. Cookies are small text files that web servers place on your device; they are designed to store basic information and to help websites and apps recognize your browser. We use cookies and other tracking technologies in the following manner: Session cookie – these are cookies which expire at the end of the browser session; Persistent cookie – these are cookies which are store on your terminal equipment for longer than one browser session. They allow for your preferences, derived from actions on one or multiple sites, to be remembered. You can prevent your web browser from accepting new cookies or disabling cookies altogether. The “Help” feature on most browsers contains those settings. If you block or otherwise reject our cookies, you may not be able to register and/or use your personal account on the Platforms, add items to your shopping cart or proceed to checkout.

6. THIRD-PARTY TOOLS

The Partners granting access to the third-Party Tools provide us with information needed for core aspects of the Platforms, as well as for additional services, programs, loyalty benefits, and promotions that can enhance your experience. These third-Party Tools can include financial service providers, marketing providers, and other businesses. We may obtain the following additional information about you from these Third-Party Tools:

- (a) Information to make the Platforms safer; and
- (b) Information to operationalize loyalty and promotional programs, such as information about your use of such programs.

7. HOW WE USE YOUR INFORMATION

We use your Personal Information for the following purposes:

7.1. Providing with Services

We use your Personal Information to provide you with the Services, an intuitive, useful, efficient, and worthwhile experience on our Platforms. To do this, we use your Personal Information to: respond to your inquiries and fulfill your requests; verify your identity and maintain your account, settings, and preferences; keep a record of your correspondence and use it to respond to you via Telegram or other means of communication, communicate with you and collect feedback about your experience with us; send administrative information, for example information regarding the Platforms and changes to our Terms; facilitate additional services and programs with third parties.

7.2. 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 Personal Information to: perform research, testing, and analysis; develop new features, partnerships, and services; 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.

7.3. Building and maintaining the Community

We work to be a positive part of the community. We may use your Personal 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 Personal 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.

7.4. 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.

7.5. 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 Personal Information to respond to those demands or obligations. We also collect, use and process your Personal 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.

8. CONSENT TO DISCLOSURE

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.

9. RECORDS RETENTION AND PROTECTION OF YOUR INFORMATION

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 three 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.

10. YOUR RIGHTS AND CHOICES REGARDING YOUR DATA

As explained more below, we provide ways to exercise your rights to your Personal Information.

10.1. 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.

10.2. Right to know / access

You may request that we disclose to you what Personal Information we have collected, used or shared about you, and why we collected, used or shared that information. Specifically, you may request that we disclose:

- (a) The categories of Personal Information collected.
- (b) Specific pieces of Personal Information collected.
- (c) The categories of sources from which we collected Personal Information.
- (d) The purposes for which we use the Personal Information.

- (e) The categories of third parties with whom we share the Personal Information.
- (f) The categories of information that we disclose to third parties.

We must provide you this information free of charge and for the 12-month period preceding your request.

There are some exceptions to the right to know. Common reasons why we may refuse to satisfy your request include:

- (a) We do not retain Personal Information once the records retention period expires.
- (b) We cannot verify your request.
- (c) The request is manifestly unfounded or excessive, or we have already provided Personal Information to you more than twice in a 12-month period.
- (d) We cannot disclose certain sensitive information, but we must tell you if we're collecting that type of information.
- (e) Disclosure would restrict our ability to comply with legal obligations, exercise legal claims or rights, or defend legal claims.
- (f) If the Personal Information is certain medical information, consumer credit reporting information, or other types of information exempt by law.

10.3. 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.

10.4. Right to correct and restrict / rectify

You may request to correct inaccurate information, restrict sensitive personal information processing, update, suppress, or otherwise modify, any of your information that you have previously provided to us, or object to the use or processing of such information by us. In your request, please make clear what information you would like to have changed; whether you would like to have your information suppressed from our database or otherwise modified; or let us know what limitations you want to place upon your information. For your protection, we may only implement requests with respect to your information associated with the particular Telegram account that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably possible. Please note that we may need to retain certain information for recordkeeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed as defined hereby.

10.5. 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.

10.6. 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.

10.7. 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.

10.8. 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.

11. GDPR COMPLIANCE

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.

12. 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 18 unless such data is provided by their parents or lawful guardians. If you believe that a child under the age of 18 has given us Personal Information without his/her parents' or lawful guardians' permission, please Contact Us.

13. INTERNATIONAL DATA TRANSFERS

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 data 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.

14. THIRD-PARTY TOOLS

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.

15. CHANGES TO THIS PRIVACY 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.

16. DISPUTE RESOLUTION

Any dispute, claim, or controversy arising out of or relating to this Policy or previous Privacy Policy statements shall be resolved through negotiation or dispute resolution as provided in our Terms.

17. ENTIRE AGREEMENT

This Policy hereby incorporates by reference any additional terms that we post on the Platforms (including, without limitation, our Terms) 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.

18. 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@xrocket.exchange.

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