

## PRIVACY POLICY

### INTRODUCTION

This Privacy Policy describes how we, **Cookie3 OÜ with its registered office in Tallinn** (“**COOKIE3**”, “**we**”, “**our**”, “**us**”, etc.), collect and use your personal data in connection with your use of the Website and the Services.

This Privacy Policy consists of three parts:

- **Privacy Notice** – which describes how we collect and use your personal data;
- **Cookie Notice** – which describes how cookies and similar technologies are used.
- **Data Processing Agreement** – which describes how we process personal data on your behalf in order to use by you the Cookie3 Analytics.

We provide the Website and the Services subject to the Terms. Please read the Terms before accessing or using the Services or the Website.

### CHILDREN

The Website and Services are restricted to persons who are at least 18 years of age. We do not knowingly collect personal data from people who are less than 18 years of age in connection with the Website or the Services. If you – the User – are below 18 years old, you may not use the Website or the Services or interact with them.

### DEFINITIONS

All terms not defined in this Privacy Policy shall have the meaning as defined in the Terms or in the GDPR. The following terms used in this Privacy Policy shall have the meaning set forth below:

- **Applicable Data Protection Law** – any applicable laws, statutes, regulations, orders, regulatory requirements, bylaws, and other similar legal instruments in force from time to time relating to data protection, data security, privacy and/or the collection, use, disclosure and/or processing of personal data, including but not limited to the GDPR.
- **controller, processor, processing**, and other terms relating to personal data not defined here have the meaning as defined in Article 4 of the GDPR.
- **COOKIE3** (“**we**”, “**our**”, “**us**” etc.) - Cookie3 OÜ with its registered office in Tallinn, address: Harju maakond, Tallinn, Nõmme linnaosa, Rannaku pst 12, 10917, Estonia, registered in the Estonian Business Register under no. 16457724.
- **DLT** – distributed ledger technology.
- **EEA** – European Economic Area.
- **GDPR** – General Data Protection Regulation 2016/679 of 27 April 2016.
- **ICT Systems** – the ICT Systems as defined in the Terms.
- **personal data** – information about identified or identifiable natural person as defined in Article 4(1) of the GDPR.
- **Privacy Policy** – this Privacy Policy.

- **Terms** – the Terms of Service of the available at the Website at: [https://assets.cookie3.com/documents/Cookie3\\_tos.pdf](https://assets.cookie3.com/documents/Cookie3_tos.pdf)
- **User** (“you”, “your”, etc.) – the User as defined in the Terms.

## Your privacy and blockchain

Blockchain network is an application of a distributed ledger technology (DLT). A distributed ledger is an information repository that keeps records of certain actions (e.g. transactions) and that is shared across, and synchronized between, a set of DLT network nodes using a consensus mechanism. Blockchains are governed by their protocols, i.e. set of rules describing how a network operates (e.g. how a consensus is reached as regards validating a transaction). Such blockchains are intended to immutably record transactions across a wide network of computers and computer systems. Public blockchains are networks that are publicly accessible. Many blockchain networks are decentralized which means that we do not control or operate them.

When you use the Services, some of your data may be recorded on public blockchain networks, depending on the Service and the blockchain protocol. This means that your personal data could be determined directly, when combined with other data, or when anonymous data is de-anonymized. As a result, third parties may potentially access your personal data. For example, many public blockchain networks are open to forensic analysis or other blockchain analytics operations which can lead to the unintentional disclosure of your personal data such as financial data or information about your transactions.

This is due to the way blockchain technology works, where transparency and immutability of the data stored on the chain is one of the fundamental principles of the technology. Because blockchain networks are decentralized, we (or our affiliates) are not able to delete or change your personal data from such blockchain networks. Please consult relevant information about the potential risks associated with using blockchain technology set out in the Terms.

## Changes

The current version of the Privacy Policy has been adopted and is effective as of April 23<sup>rd</sup>, 2025.

We may change the Privacy Policy from time to time. For example, we may do this when it is necessary due to changes in the Terms, changes in legal requirements, or changes in the way we use your personal information. We may also amend the Privacy Policy to make it clearer, more accessible, and/or easier for you to understand.

You should check the Privacy Policy before using the Website and/or the Services. If we change the Privacy Policy, we will give you access to previous versions of the Privacy Policy.

## 1. PRIVACY NOTICE

### 1.1. Controller

We, COOKIE3, are the controller of your personal data to the extent this Privacy Policy applies.

### 1.2. Contact details

You can contact us with any inquiries or complaints in respect of the personal data by email at: [legal@cookie3.com](mailto:legal@cookie3.com) or in writing to our address: Cookie3 OÜ with its registered office in Tallinn, address: Harju maakond, Tallinn, Nomme linnaosa, Rannaku pst 12, 10917, Estonia.

### 1.3. Sources of personal data

We collect your personal data from the following sources:

<b>You</b>	We collect your personal data from you in connection with your use of the Website or the Services. For example, we collect data when you provide us with public address of your Wallet when you connect it to the Website.
<b>Automatic data collection</b>	We collect your personal data from your devices or software in connection with your use of the Website or the Services. For example, we may collect information about your device, its operating system or other software, hardware details, web browser settings and so on when you are browsing the Website. We collect this information also when you visit our Website without registration.
<b>Blockchain network</b>	We collect data from blockchain networks in connection with providing the Services. Such information may include personal and/or anonymous data.
<b>Third parties</b>	We collect your personal data from third parties in connection with your use of the Website or the Services. Please consult our Cookie Notice (Section 2) for more information.

### 1.4. CATEGORIES OF PERSONAL DATA

We use your personal data only when it is lawful under the Applicable Data Protection Law and only to the extent it is necessary to achieve our purposes (please consult Section 1.5). We collect and use the following types of your personal data in connection with your use of the Website and the Services.

<b>Account data</b>	The account data includes data collected and used in connection with your Account, as well as other basic data, including your contact details. For example, this may include public address of your Wallet, and so on.
<b>Blockchain data</b>	The blockchain data includes anonymous data and, in some cases, your personal data that we receive in connection with your use of the Services, as well as our activity and the activity of third parties connected with rendering the Services. For example, this includes publicly accessible on-chain information (which can be personal data) and limited off-chain information of technical nature, such as a type of a device, browser version and so on (anonymous data, as a rule). This also includes wallet address which is a personal data when the wallet belongs to you, the User. In general, if blockchain data allows your identification we treat it as personal data in compliance with the GDPR and Applicable Data Protection Law.
<b>Customer support data</b>	The customer support data includes data collected and used in connection with customer support provided by us to you. For example, this may include your communication with us as regards your rights as a consumer, including

	by telephone or other means of communication, your participation in our surveys or questionnaires or your other requests, questions, and queries.
<b>Social media and online communicators data</b>	<p>The social media data and online communicators data includes data collected and used in connection with your interactions or visits with profiles or accounts on such platforms. For example, this includes contents of your posts, their metadata (e.g. time of posting) when you post on social media. We use automatic data collection solutions to collect this information.</p> <p>Please note that such platforms are independent data controllers. Your use of such platforms is subject to the privacy policies and terms and conditions of their providers. We encourage you to consult such documents before using such services. We are not responsible for the privacy policies and practices of such third parties.</p>
<b>Technical data</b>	The technical data includes data collected and used in connection with the ICT Systems. For example, this includes your IP address or other online identifiers, information about your operating system or other software used by your device, hardware details, statistics derived from this data and so on. Most of this information is anonymous data. However, in some cases it may be used to identify you, for example in combination with other data. In such cases we treat it as personal data.
<b>Tracking data</b>	The tracking data includes data collected and used in connection with use of cookies and similar technologies, such as pixels, beacons, tags, device IDs, Local Shared Objects or tracking pixels. For example, this includes personal data used when we use Cookie3 Analytics or similar tracking solutions. Please look at the <a href="#">Cookie Notice</a> (Section 2) to learn more about cookies and similar technologies.

#### 1.5. PURPOSE AND LEGAL GROUND OF PROCESSING PERSONAL DATA

We collect and process your personal data in connection with your use of the Website and the Services. As a rule, we process your personal data to the extent necessary to provide the Services, ensure smooth operation of the Website, as well as for other legitimate purposes. You can find the description of such purposes and legal grounds for processing in greater detail below.

<b>Category</b>	<b>Purposes of processing of personal data</b>	<b>Legal grounds of processing</b>
<b>Analytics</b>	We use your personal data for analytical and statistical purposes.	The legal ground for such processing is our legitimate interest (Article 6(1)(f) GDPR), which consists of conducting analyses of your activity, as well as of your preferences to improve functionalities and services provided by us. Where required by

		law, we will only conduct analytical activities with your consent.
<b>Business operations</b>	We use your personal data for the technical and administration purposes in connection with the maintenance and development of our business. For example, this includes internal assessments, audits, products and services development or improvement and so on.	The legal ground for processing your personal data is our legitimate interest (Article 6(1)(f) GDPR), which consists of maintaining and developing our business operations and improving our products and services.
<b>Compliance</b>	We use your personal data to ensure compliance with the applicable law. For example, this includes processing of your personal data to comply with consumer protection law. We also process your personal data to comply with the GDPR, for example when you submit your request as regards your privacy rights and for accountability purposes.	The legal ground for processing is the necessity of processing for compliance with appropriate legal obligation under applicable law to which we are subject (Article 6(1)(c) GDPR).
<b>Contract performance</b>	We use your personal data to perform contracts we have executed with you. For example, this includes contract subject to the Terms under which we provide the Services.	The legal ground for such processing is the necessity of processing for either taking steps at your request prior to entering into a contract and/or performance of a contract with you (Article 6(1)(b) GDPR). Please consult the Terms for more detailed description of the Services.
<b>Cookies</b>	We use your personal data in connection with the use of cookies or similar technologies for purposes described in the next column in this table. For example, we may use cookies for analytical and statistical purposes. Please look at the Cookie Notice (Section 2) to learn more about cookies and similar technologies.	The legal grounds for processing your personal data are (depending on the type of cookies) your consent (Article 6(1)(a) GDPR) or necessity of processing for performance of a contract with you (Article 6(1)(b) GDPR).

<b>Legal rights</b>	We may use your personal data, if necessary, to establish and assert claims or to defend against claims.	The legal ground for such processing is our legitimate interest (Article 6(1)(f) GDPR), which consists of the protection of our legal rights.
<b>Marketing</b>	We use your personal data for the communication and marketing purposes. For example, this includes providing you with our notifications, email or other messages containing commercial information about our brand, products, or services. This also includes processing your personal data for the purpose of promoting our brand, including informing you about activities, events and news concerning us.	The legal ground of the processing is our legitimate interest (Article 6(1)(f) GDPR), which consists of improving our services, communication with the Users, promotion, and marketing. Where required by law, we will be conducting direct marketing activities only with your consent.
<b>Security</b>	We use your personal data to ensure the security of the Website and our ICT Systems and to manage them. For example, we record some of your personal data in system logs (special computer programs used for storing a chronological record containing information about events and actions related to the ICT Systems used for rendering the Services by us).	The legal ground of the processing is our legitimate interest (Article 6(1)(f) GDPR), which consists of our need to ensure security and safety of our ICT Systems used in connection with the Website and the Services.

## 1.6. DATA RECIPIENTS

As a rule, we do not share your personal data unless it is necessary. For example, we may share your personal data in connection with the provision of the Services under the Terms. We may disclose your personal data to the following categories of recipients:

- our business partners (including service providers and contractors), such as marketing and advertising services providers, analytical tools providers, payment services providers, data storage providers;
- banks, insurance companies, and/or other financial institutions;
- COOKIE3 group entities, including our affiliates, subsidiaries and, in the event of a merger, acquisition or reorganisation, the third party involved;
- public authorities or other third parties when required by law and subject to statutory conditions and restrictions;

- professional advisors, such as lawyers, accountants, consultants, and tax advisors;
- other third parties if admissible under Applicable Data Protection Law (e.g. with your consent).

We require our partners to keep your data secure and confidential under the terms that ensure level of protection essentially equivalent to that described in this Privacy Notice. Please note that some of them act on our behalf as our processors and some act as independent controllers of your personal data. If they are controllers of your data, relevant privacy policies and terms and conditions of such controllers may apply. We encourage you to consult such documents before using such services. We are not responsible for the privacy policies and practices of the third parties. Below you can find additional information on selected categories of recipients of your data.

#### **1.6.1. Blockchain network participants**

Please note that your use of the blockchain networks in connection with the Services, depending on the blockchain protocol, may result in recording some of your personal data on the blockchain. This means that your personal data could be identified directly, when combined with other data, or when anonymous data is de-anonymized. As a result, third parties may potentially access your personal data.

#### **1.6.2. Our affiliates and subsidiaries**

We share your personal data with our affiliates and subsidiaries. All such entities adhere to the same level of personal data protection as described in this Privacy Notice. In addition, in case of a merger, acquisition or reorganization, we may share your personal data with an involved party. We will ensure that such third party is obligated to keep your data secure and confidential under the terms that ensure level of protection essentially equivalent to that described in this Privacy Notice.

#### **1.6.3. Public authorities**

We may share your personal data with public authorities where required by law and subject to the statutory conditions and limitations.

### **1.7. OBLIGATORY OR VOLUNTARY PROVISION OF PERSONAL DATA**

In some cases, provision of your personal data is mandatory by law or necessary to carry out your request or to perform a contract we have with you. If you don't provide us with your personal data in such situations, we may not be able to carry out your request, perform a contract with you (or enter into it) or comply with the law. In some cases, this may mean that we will terminate the contract or stop our engagement with you. For example, if you do not provide your personal data necessary for the complaint procedure, we may not be able to process your complaint. In other cases, provision of your personal data is voluntary. If you don't provide us with your personal data in such situations, we may not be able to carry out your request or achieve our goal. For example, if you do not share your contact details with us, we may not be able to contact you.

### **1.8. DATA STORAGE**

We store your personal data only as long as necessary for the purposes we collected it. This means that the duration of storage depends on the purpose of processing. For example, we store your personal data for the period when we provide you the Services in accordance with the agreement we have entered with you subject to the Terms. We store personal data processed based on legitimate interest(s), our or those of a third party, until you lodge an effective objection to such processing. Similarly, when we process your personal data based on your consent, we store it until you withdraw your consent.

The duration of storage or use of your data may be extended in certain situations. For example, we may store your personal data after you terminate the agreement with us when required by law. We may also continue to store and use the same dataset if we use it for a different purpose and on a different legal basis, if admissible by law. For example, if you terminate the agreement with us, we may continue to use personal data provided by you in connection with your use of the Services when necessary to establish and assert possible claims or to defend against claims (if we have a legitimate interest to do so).

After the end of the period of data storage, we permanently delete or anonymize your personal data.

Please note that use of the blockchain networks in connection with the Services, depending on the blockchain protocol, may result in recording some of your personal data on the blockchain. This means that your personal data could be determined directly, when combined with other data, or when anonymous data is de-anonymized. As a result, third parties may potentially access your personal data. For example, many public blockchain networks are open to forensic analysis or other blockchain analytics operation which can lead to the unintentional disclosure of your personal data or information about your transactions. This is due to the way blockchain technology works, where transparency and immutability of the data stored on the chain is one of the fundamental principles of the technology. Please consult relevant information about the potential risks associated with using blockchain technology set out in the Terms.

### 1.9. DATA TRANSFERS

The level of protection for the personal data outside the European Economic Area (EEA) differs from that provided by the EU law. For this reason, we transfer your personal data to recipients outside of the EEA only when necessary and with an adequate level of protection.

We secure the adequate level of protection primarily by cooperating with processors of the personal data in countries for which there has been a relevant European Commission decision finding an adequate level of protection for the personal data. Alternatively, we may use the standard contractual clauses issued by the European Commission. If you want to learn more about these safeguards, obtain a copy of them or learn where they have been made available, contact us.

### 1.10. YOUR RIGHTS

To exercise your right(s) contact us (please look at Section 1.2).

Under the Applicable Data Protection Law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal data.
- **Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete data you think is incomplete.
- **Your right to erasure (right to be forgotten)**- You have the right to ask us to erase your personal data in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances. This right applies where we use your data based on your consent or a contract and if the processing of your data is carried out by automated means.



- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent. You can do this at any time. If you withdraw consent, we will stop using your personal data where the basis for processing is consent. Withdrawal of consent does not affect the lawfulness of processing your data based on consent before withdrawal.
- **Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances. You can do this at any time. If you raise an objection, we will stop using your personal data where the basis for processing is our legitimate interest. In exceptional circumstances, we may continue to use your data despite your objection. This exception does not apply when you object to the processing of data for direct marketing purposes, i.e., if you object to it, we will stop processing your personal data on this basis.
- **Your right to lodge a complaint** - You can lodge a complaint with the supervisory authority dealing with the protection of personal data. You can lodge such complaint with your local data protection authority.

**Please note that due to the nature of the blockchain technology it may be technically impossible, depending on a blockchain protocol, to delete or correct any information recorded on-chain in a public blockchain network.** As the blockchain technology operates on a decentralized network, we don't have any control over such networks.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you. To make a data protection rights request, contact us using our contact details (Section 1.2).

#### **1.11. AUTOMATED DECISION MAKING**

We do not make any decisions based solely on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affects you.

## 2. COOKIE NOTICE

### 2.1. INTRODUCTION

This Cookie Policy describes how Cookie3 OÜ with its registered office in Tallinn, address: Harju maakond, Tallinn, Nõmme linnaosa, Rannaku pst 12, 10917, Estonia (“**COOKIE3**”, “**we**”, “**our**”, “**us**”, etc.) stores or accesses information on your terminal device in connection with your use of the Website or the Services.

### 2.2. WHAT ARE COOKIES?

Cookies are small text files installed on your device that collect information which, generally, facilitates use of the Website and the Services. For example, cookies may remember your language preferences or other settings of your Internet browser. In most cases information used in connection with cookies is personal data. In such cases, the Privacy Notice applies to such personal data.

We mainly use our own cookies. We also use third-party cookies, i.e. cookies from a domain other than the domain of the visited website, primarily for analytical activities. We may also use other technologies similar to cookies, for example HTML5 local storage, *Local Shared Objects* or tracking pixels. Where we refer to cookies in this Cookie Notice, we also mean such technologies.

The cookies are used only when it is admissible by law.

### 2.3. WHAT COOKIES ARE USED?

**We and our partners are currently not using any cookies (i.e. solutions that do not store or access typical cookie files on your device). However, we are using cookie-less tracking technologies of our analytical services providers.** Below we describe in greater detail some tools of our partners used for analytical or marketing purposes:

### 2.4. YOUR COOKIE CHOICES

There are several ways in which you can manage cookies.

#### 2.4.1. Your consent

Optional cookies, for example advertising cookies, are used only with your consent. You can withdraw your consent at any time.

#### 2.4.2. Web browser

You can also manage cookies through your web browser. For example, you can delete all or some cookies from your device or block them. Please note that deleting or blocking cookies may cause the Website or the Services to not function properly or to stop functioning altogether.

To manage cookies through your web browser, refer to the instructions provided by your browser provider. For example, some of such instructions for the relevant web browsers can be found on the websites of their operators: Microsoft (Internet Explorer, Edge), Google (Chrome), Apple (Safari), Mozilla (Firefox), Opera (Opera).

#### 2.4.3. Your rights related to personal data

You have rights related to your personal data as set out in the Privacy Notice (Section 1.10).

### **3. DATA PROCESSING AGREEMENT**

Cookie3 Analytics is a tool to analyse the use of the Website, including your Wallet when you connect it with the Website, and to produce statistics and reports on their operations. The solution is provided by us, and when you are using Cookie3 Analytics in relation to the users to whom you apply this tool, we act as the entity processing personal data, and you act as the processor. In order to ensure your lawful use of Cookie3 Analytics, including compliance with the law regarding the processing of personal data, we conclude an agreement with you on entrusting the processing of personal data in accordance with the conditions described at this address: <https://www.cookie3.co/dpa>.