

ALEMX PRIVACY POLICY

Thank you for choosing to be part of the AlemX!

This Privacy Policy covers the data you provide to us through your use of AlemX's websites, applications, and protocol, and other services linked to this Privacy Policy.

1. What is in this Privacy Policy?

- Our commitment to protecting your privacy and data
- Information we collect and why
- How we use the data we collect
- Where we process your data
- When we share your data
- How we use cookies
- How long we keep your data
- How to contact us about this Privacy Policy

2. Our Commitment to Protecting your Privacy and Data

We are deeply committed to protecting your privacy and securing your data:

Privacy

We expressly designed our products and services with your privacy in mind. When we collect data, we do so to improve our product and services. We will always tell you, here in this Privacy Policy or in data consent forms for specific products or services, what data we are collecting, why we are collecting that data, and what we do with it.

Data Security

We have a dedicated team to look after your data and have implemented physical and electronic safeguards that protect your data both in transit and at rest. At the same time, no service can be completely secure - if you have any concerns about your account or your data, please contact us through our e-mail.

Our commitment to your privacy and data security extends beyond what is required by law and covered in most privacy statements. At AlemX, we recognize that we can only fulfill our mission of distributing AlemX fairly to as many people as possible if people trust us, and privacy and data security are central to earning your trust.

3. Information We Collect and Why

3.1 Data You Provide To Us

As a user, you are not required to provide any data to access the AlemX app. However, you may need to provide us with certain data in order to use a feature within the Services. Below is a list of data that you can provide and what we may use the data for:

- **First and last name:** You may choose to enter your name to associate it with your account. AlemX and other users may see your name when they choose to interact with your account. We may require your name when you submit a data subject request.
- **Email address:** You may choose to enter your email to associate it with your account. We may require your email when you submit a data subject request.
- **Phone number:** You may choose to enter your phone number to associate it with your account. With your permission, other users may be able to find your account through your phone number. We may require a phone number when you submit a data subject request.
- **Feedback and correspondence from you:** These include any emails, chat messages, or other communications that you send us via email or third-party social media websites.

Please note: You are responsible for ensuring that sharing your contacts' information complies with applicable laws. This may require that you obtain your contacts' permission. We may also get information about you from other users importing or entering their contacts. We use and may store this contact information to help you and your contacts connect through our Services. You can change your mind and turn off our access to your contacts at any time in your device settings. If you elect to import your device's address book contacts to find out which of your contacts uses our Services or invite them to join you in using our Services, we will periodically sync your contacts' information, including phone number and email, to our servers.

If you have a business relationship with us (such as if you are an Orb Operator or a supplier), then we may require information such as names, mailing address, email, phone number, wallet address, and other documentation (such as your government ID) as part of furthering that business relationship and to satisfy our know-your-customers obligations.

3.2 Location Information

If you decide to enable a location-based service (such as a feature allowing you to find an Orb Operator near you), then we may collect information about your location so we can provide such a service. Your location can be determined by:

- GPS
- IP address
- Information about nearby cell towers and Wi-Fi access point information

The type of location data collected depends on the service you are using, the device you're using (for example, Apple or Android), and your device's settings (whether permissions are enabled or disabled). You can change your permissions any time in your device's settings.

3.3 Data We Collect Automatically

If permitted under applicable law, we may collect certain types of data automatically when you interact with our Services. This information helps us address customer support issues, improve the performance of the Services, provide you with a streamlined and personalized experience, and secure your Account credentials. Information collected automatically includes:

- **Online Identifiers:** Geo-location and tracking details (see above), computer or mobile phone operating system, web browser name and version, and IP addresses
- **Usage Data:** Authentication data, security questions, public social networking posts, and other data collected via cookies and similar technologies

Similarly, the AlemX mobile application gathers information for troubleshooting and improvement. We use third-party services, such as Segment.io or PostHog, to view aggregated information about end user usage and interactions. Where possible, we take steps to minimize or mask the information sent to third parties (such as encoding the data).

3.4 Anonymized and Aggregated Data

Anonymization is a data processing technique that modifies personal data so that it cannot be associated with a specific individual. Examples of anonymized data include:

- Transaction data
- Click-stream data
- Performance metrics
- Fraud indicators

We also aggregate data, combining large amounts of information together so that it no longer identifies or references an individual. We use anonymized or aggregate data for our business purposes, such as understanding user needs and behaviors, improving our Services, conducting business intelligence and marketing, detecting security threats, and training our algorithms.

4. How We Use the Data We Collect

We must have a valid reason (or “lawful basis for processing”) to use your personal information. When it comes to your biometric data, we ask for your explicit consent. However, in instances when you'd reasonably expect us to use your personal information and our use of that information complies with applicable laws, we don't ask for your permission.

We use your information for the following types of purposes:

- Providing our Services to you, as well as information about our Services;
- Conducting research to develop and improve our product;
- Training our algorithm to better recognize unique users;

- Analyzing your use of our Services to provide better support;
- Using your wallet address to send you ALMX tokens or other cryptocurrencies that we support;
- Complying with applicable laws (such as using your IP address to block individuals whose country does not allow them to access the Services);
- Handling your requests, complaints and inquiries.

5. Where We Process Your Data

Please note: When you provide us with your data, it may be transferred, stored, or processed in a location outside of where your data was originally collected. The country in which your data is transferred, stored, or processed may not have the same data protection laws as the country in which you initially provided the data.

6. When We Share Your Data

We will never sell your data.

When we share your data outside of AlemX, we will always:

- Share it in a secure way;
- Make sure that it is handled in a manner that is consistent with our commitment to your privacy; and
- Prohibit other companies from using it for their own marketing purposes.

We do share your data, both within AlemX and with those outside of AlemX, in these limited ways:

- **Within AlemX:** We only disclose data to AlemX team members who require access in order to perform their tasks and duties. We only disclose as much data as is needed to perform specific tasks and duties.
- **With vendors and service providers outside of AlemX:** We only disclose data to service providers whose services we rely on in order to process the data and provide our Services to you. We only disclose data with Identity Verification Vendors if required by Law (i.e., know-your-customer-requirements). The data we provide to Identity Verification Vendors does not include any biometric data.
- **With law enforcement, officials, or other third parties:** We may disclose your data in order to comply with applicable laws and respond to mandatory legal demands. We will carefully consider each request to determine whether the request complies with the law, and we will not hesitate to challenge invalid, overbroad, or unlawful requests. We will only share your data with law enforcement, officials and other third parties if we are compelled by a subpoena, court order, or similar

procedure.

7. How We Use Cookies

We use cookies to help our Services work better. In addition to cookies, we may use other similar technologies, like web beacons, to track users of our Services. Web beacons (also known as "clear gifs") are tiny graphics with a unique identifier, similar in function to cookies. They are used to track the online movements of web users.

In contrast to cookies, which are stored on a user's hard drive or device, clear gifs are embedded invisibly on web pages and are about the size of the period at the end of this sentence. We and our third-party service provider employ web beacons for the reasons stated below, but primarily to help us better manage content on our Services by informing us which content is effective.

We may also use so-called "Flash Cookies" (also known as "Local Shared Objects" or "LSOs") to collect and store information about your use of our services, prevent fraud, and support other site operations.

Together, these tools allow us to:

- Perform website analytics;
- Prevent fraud and prevent attacks against our websites and Services; and
- Advertise our Services, and additional products and services from our third-party partners.

We use cookies and trackers to assign you a unique identifier so we can record:

- Websites you visit
- Duration of your visit, including the amount of time an advertisement or webpage was visible
- Your IP Address

You can block cookies at any time using your web browser settings, but doing so may limit your browsing experience and your ability to use certain features of the Services. We do not currently respond to "Do Not Track" or DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

We use the following types of cookies:

Strictly Necessary Cookies: These cookies are necessary for the Services to function and cannot be switched off in our systems. They are usually only set in response to actions made by you that amount to a request for services, such as setting your privacy preferences, logging in, or filling in forms. These also include cookies we may rely on for fraud prevention. You can set your browser to block or alert you about these cookies, but some of the Services may not work.

Performance/Analytics Cookies: These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Services. They help us understand page popularity and visitors movement around the Services. All information these cookies collect is aggregated and is therefore anonymous. If you do not allow these

cookies, we will not know when you have used our Services and will not be able to monitor performance.

Functionality Cookies: These cookies allow us to remember the choices you make and to tailor our Services so we can provide relevant content to you. For example, a functionality cookie can remember your preferences (e.g., country or language selection), or your username.

Targeting/Advertising Cookies: AlemX uses third-party service providers to display advertising on our Services and serve advertising on other third-party sites that may be relevant to you or your interests. These cookies are also used to help measure the effectiveness of an advertising campaign. They remember that you have visited a website and this information may be shared with other organizations, such as advertisers. This means that after you have been to our websites, you may see advertisements about our Services elsewhere on the Internet. The information collected through this process by the third-party service providers does not enable us or them to identify your name, contact details, or other personal information that directly identifies you unless you choose to provide this information. Such advertising will only be delivered where permitted by applicable laws. If you do not allow these cookies, you will experience less advertising tailored to your inferred interests on our websites and will not receive targeted AlemX advertisements on third-party websites.

AlemX also uses Google Analytics. Your use of the Services is evidence of your consent to AlemX storing and accessing cookies and other data on your computer or mobile device and AlemX's use of Google Analytics in connection with such activities. Please read the information at the link provided so you understand what you are consenting to.

8. How Long Do We Keep Your Data?

We retain your data for as long as is reasonably necessary to provide our Services to you, serve our legitimate business purposes, and comply with our legal and regulatory obligations. If you close your account with us, we will continue to retain your data as necessary to comply with our legal and regulatory obligations, including fraud monitoring, detection, and prevention, as well as tax, accounting, and financial reporting obligations.

Please note: Blockchains are decentralized third-party networks that are not controlled or operated by AlemX. Due to the public and immutable nature of blockchain technology, we cannot amend, erase, or control the disclosure of data that is stored on blockchains.

9. How to Contact us About this Privacy Policy

You may choose to delete your data from within the AlemX app. If you have questions or concerns regarding this Privacy Policy, wish to exercise your rights, please submit your request through our e-mail. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. You can also delete your data from within the AlemX application.