

Privacy Policy

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NAV Labs SPC Ltd. and its affiliates (collectively “NAV Labs”, “NAV”, “we”, “us”, “our”) respect the privacy of its customers, users and visitors of its services, including its platforms, apps and website (collectively, the “Services”). For further information on our Services and how to use them, please see our Terms of Service https://nav.finance/Terms_of_Service.pdf. This Privacy Policy informs you of how we gather, use, store, disclose, and otherwise process your information, including personal information (also known as personal data), in conjunction with your access and use of our Services. Please read this Privacy Policy carefully to understand our views and practices regarding your personal information and how we will treat it.

1. CONTACT AND CONTROLLER DETAILS

If you would like to contact us or ask us any questions about our privacy practices or any of the information in this Privacy Policy, please email us at contact@nav.finance. If you are an individual located in the EU or the UK, the controller of your personal information is NAV Labs SPC Ltd.

2. PERSONAL INFORMATION WE COLLECT

“Personal Information”, also often referred to as “Personal Data”, means information that identifies (whether directly or indirectly) a particular individual, household, or device, such as the individual’s first and last name, postal address, e-mail address, telephone number, username, and/or image. The categories of personal information we collect depend on how you use the Services and the requirements of applicable law.

Information You Provide to Us

- **Wallet Address:** In order for us to provide you with the Services, we will require to know and process your Wallet Address. Whilst in most instances your Wallet Address will not be able to identify you as an individual (and therefore it will not be considered personal information as the law strictly defines it), in certain limited circumstances, it could lead to you being identifiable, for example if it was stored alongside another identifier. To reduce the chances of you being identifiable from your Wallet Address, we do not process it with, or store it alongside, any other identifiers listed below, such as your IP address.

- **Location Data:** In accordance with our Terms of Service, we do not offer or provide our Services in Restricted Countries, or permit persons or entities located in Restricted Countries to use our Services (please see Terms of Service for more information). To confirm you are not located in a Restricted Country, we collect your IP address and country code when connecting to or accessing our Services. To ensure compliance with our Terms of Services, we store the IP address and country code of any person who tries to access our Services from a Restricted Country. If you

are accessing from a country which is not a Restricted Country, we will immediately delete your IP address and country code after confirming your location. Please note that location checking occurs each time you access the Services.

- **Restricted Company Mailing List:** In accordance with the above, if we identify from your IP address and country code that you are located in a Restricted Country, we provide you the opportunity to be added to a mailing list which will ensure you are notified if the Restricted Country list is updated. To do this, we require your email address. Unless you specify otherwise, we will not use your email address for other marketing purposes.

- **Transaction Information:** When you commence using our Services, Ethereum blockchain and other public blockchains provide transparency into transactions. As this information is linked to your Wallet Address, it will almost never identify you as an individual but it will provide us a clear insight into your transactions which are required to perform the Services.

- **Marketing Preferences:** Based on your consent and marketing preferences, we may send you marketing communications such as emails. From this, we may collect further preferences from you based on how you interact and respond to our marketing communications. You have the right at any time to withdraw your consent at any time.

- **Your Communications with Us.** We collect personal information from you such as email address, phone number, or mailing address when you request information about our Services, request customer or technical support, or otherwise communicate with us. • **Surveys.** We may contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information which may include personal information.

- **Forum Content.** We may offer forums, blogs, or social media pages. Any content you provide on these channels will be considered “public” and is not subject to privacy protections.

- **Registration for Sweepstakes or Contests.** We may run sweepstakes and contests (other than for the benefit of residents and entities organized within Restricted Countries – see Terms of Service for more information). Contact information you provide may be used to reach you about the sweepstakes or contest and for other promotional, marketing and business purposes, if permitted by law. In some jurisdictions, we are required to publicly share information of winners. **Information Collected Automatically or From Others**

- **Automatic Data Collection:** We may collect certain limited information automatically when you use the Services. This information may include your IP address, user settings, and other online identifiers, details about

your browser, operating system or device, and other information about how you use the Services. We do this so we can offer the Services to you. We do not store this information nor use it for any other purposes.

3. HOW WE USE YOUR INFORMATION

We may use your personal information for a variety of business purposes, including to:

- **Provide the Services:** We will use your information to provide you with, and facilitate the use of, our Services.
- **Location:** We will use your information to confirm you are not located in or established under the laws of a Restricted Country (see Terms of Service for further information).
- **Communications:** We will use your information to communicate with you about your use of the Services, changes to policies of terms, and in response to any queries, questions or comments you send to us. If you are on the Restricted Country Mailing list (as discussed above), we may use your email address to communicate to you that there has been a change in the Restricted Country list.
- **Marketing:** We may use your information to send you marketing communications, subject to you providing your consent.
- **Surveys, Contests and Sweepstakes:** Where necessary, we may use your information to allow you to take part in surveys, contests and sweepstakes.
- **Security:** We may use your information to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and to prosecute those responsible for that activity.
- **Monitoring and Improving:** We may use your information for internal quality control purposes, to monitor engagement with our Services and how our Services are being used in order to identify any issues and to improve, enhance and upgrade our Services.
- **New Products or Services:** We may use your information to research and develop new products or services.
- **Terms and Policies:** We may use your information to detect, investigate and prevent activities on our Services that may violate our terms or policies, including our Terms of Services, or be harmful to us, our property, or our other users in any way.
- **Compliance:** We may use your information to comply with applicable laws and regulations and any lawful requests received from regulators, governmental bodies or authorities. To process your information for such purposes, we rely on the following lawful bases:

- **Consent:** if you give us consent to undertake a particular processing activity, for example to receive marketing communications, which you can remove at any time.
- **Performance of a Contract:** our processing is necessary for the performance of a contract we have with you or to take specific steps before entering into a contract with you. This may be a contract to receive Services from us, i.e. the Terms of Service.
- **Legal Obligation:** processing is necessary for us to comply with laws, regulations and regulatory authorities, court orders or law enforcement requests. **Legitimate interests:** processing is necessary for ours, or a third party's, legitimate interests. The legitimate interests pursued by us are to improve our business, resolve disputes, prevent fraud and abuse, analyse and improve safety and security of our Services, enforce our Terms of Service. You have the right to object to our processing based on legitimate interests.

4. DISCLOSING YOUR INFORMATION TO THIRD PARTIES AND INTERNATIONAL TRANSFERS

Where permitted by applicable law, we may share your personal information in the following instances:

- **Service Providers.** We may share any personal information we collect about you with certain of our service providers. The categories of service providers to whom we entrust personal information may include: IT and related services; banks and trust companies; information and services; payment processors; customer service providers; and vendors to support the provision of the Services. We enter into contracts with such service providers which ensure they cannot use your information for any purposes other than as instructed by us.
- **Affiliates.** We may share personal information with our affiliated companies if necessary for supporting the provision of the Services.
- **Disclosures to Protect Us or Others.** We may access, preserve, and disclose any information we store with third parties if we, in good faith, believe doing so is required or appropriate to: comply with applicable laws, or law enforcement or national security requests and legal process, such as a court order; protect your, our or others' rights, property, or safety; enforce our policies or contracts (including our Terms of Service); or assist with an investigation or prosecution of suspected or actual illegal activity.
- **Disclosure in the Event of Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or

transition of service to another provider, then your information may be sold, transferred or otherwise shared as part of such a transaction. As an organisation operating globally, we may be required to transfer your personal information to countries other than that from which it was collected which may have data protection laws that are different from the laws where you live. When transferring your personal information cross-border, we will ensure to comply with all applicable laws, including by implementing appropriate safeguards to require that your personal information will be provided equivalent protection. Further details can be provided upon request.

5. YOUR CHOICES

In certain circumstances and depending on applicable law, you may have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law.
- Object to processing of your personal information where we are relying on a legitimate interest. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in certain scenarios.
- Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format.
- Withdraw consent at any time where we are relying on consent to process your personal information.

- Complain to a supervisory authority. If you have any data protection issues, you have the right to submit a complaint to a data protection supervisory authority. We would, however, appreciate the opportunity to resolve your concerns before you approach the supervisory authority so please contact us in the first instance. To exercise one of the above rights, please contact us using the details provided above. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

6. DATA RETENTION

We store the personal information we receive as described in this Privacy Policy for as long as is necessary for us to provide you with the Services or as necessary to fulfil the other purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defences, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

7. SECURITY OF YOUR INFORMATION

We implement technical, physical and organizational security safeguards designed to protect your personal information, from loss, misuse and unauthorized access and disclosure. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We regularly monitor our systems for possible vulnerabilities and attacks. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us.

8. THIRD PARTY LINKS AND PLUG-INS

Our Services may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites, plug-ins or applications, and are not responsible for their privacy statements. When you leave our Services or authorise the use of a third party plug-in, we encourage you to read the privacy policy of every website or plug-in provider.

9. CHANGES TO OUR PRIVACY POLICY

We may revise this Privacy Policy from time to time in our sole discretion and will post a revised version on our Services platforms when updated. If

there are any material changes to this Privacy Policy, we will notify you as required by applicable law. We encourage you to regularly visit our Services platforms to review any changes made.