

PARTI Privacy Policy

PARTI (the “Company”, “we”, “us”, or “our”) is committed to protecting your privacy. This Privacy Policy describes our practices for using, maintaining, disclosing, and otherwise processing Personal Information (as defined below) that we may collect when you visit our website at <https://parti.com>, use our PARTI Wallet, or otherwise interact with us (collectively, the “Services”). Please read this Privacy Policy carefully.

WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL INFORMATION?

The data controller for the processing of Personal Information in the context of our Services is PARTI.

Questions, comments, and requests regarding our Privacy Policy may be addressed to us at support@parti.com.

WHAT TYPES OF PERSONAL INFORMATION DO WE PROCESS?

In this Privacy Policy, we use the term “Personal Information” to refer to information that can be used to identify you.

When you interact with us, we may collect certain Personal Information directly from you or automatically from the devices you use to access our Services. We may also collect Personal Information from third parties, such as social media companies.

Depending on how you interact with us, we may collect the following types of Personal Information from you or about you:

Type of information	Examples of information
Identification information	Birth date, gender
Contact details	Email address
Registration information	Newsletter requests and login information, such as username and password
Wallet information	When you sign up to use our PARTI Wallet and connect it to your crypto account, we collect your

	wallet address and information related to the integrations you select
Transaction information	Information about transactions you make, such as the wallet address of the sender and recipient, the amount, currency preferences, PARTI tokens, date, and/or timestamp
Media and other sensory information	Photographs, videos, and images posted to our Services by you or others
Internet or other electronic network activity information	Date and time of visit, IP address, device type, browser type, operating system, and viewed pages
Location information	Geolocation based on your IP address
Communications with others	Messages sent on our Services
Information others provide about you	Comments on your media and messages sent to you
Information related to your communications with us	Subject, content, and date and time of your communications with us or your use of our online services, including during customer service interactions

Generally, providing your Personal Information to us is optional. We will inform you if providing Personal Information is mandatory. If you refuse to provide Personal Information that is mandatory, you may not be able to use or access all parts of the Services.

OUR PURPOSES FOR PROCESSING YOUR PERSONAL INFORMATION?

We process your Personal Information for the following purposes and corresponding legal basis/bases:

Purpose	Legal Basis
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<p>Providing the Services (e.g., creating and maintaining your account or using your crypto wallet information to transmit tokens to you).</p>	<ul style="list-style-type: none"> • Performance of/preparing to enter into a contract with you • Our legitimate interests in providing the Services
<p>Managing our relationship with you (e.g., responding to your messages, communicating administrative or transactional information about the Services to you, or providing customer support).</p>	<ul style="list-style-type: none"> • Performance of/preparing to enter into a contract with you • Our legitimate interest in building and maintaining the Services
<p>Improving our Services and your experience (e.g., using information about how you interact with the Services to improve the structure and content of our website or app).</p>	<ul style="list-style-type: none"> • Our legitimate interests in optimizing the Services and your experience
<p>Offering information or promotional materials about our products and services. You can opt-out of our marketing emails by clicking on the “unsubscribe” link in the email you received or by sending an email to support@parti.com.</p>	<ul style="list-style-type: none"> • Our legitimate interests in marketing to you • Your consent, when appropriate
<p>Offering our rewards or loyalty program to you. If you do not wish to participate in such programs, you can opt-out by sending us an email to support@parti.com.</p>	<ul style="list-style-type: none"> • Our legitimate interests in marketing to you • Your consent, when appropriate

<p>Protecting the Services and defending our rights, including investigating, preventing, or taking pre-litigation or litigation actions regarding potential violations of our terms or policies, suspected fraud, situations involving potential threats to the safety of any person, and illegal activities.</p>	<ul style="list-style-type: none"> • Performance of/preparing to enter into a contract with you • Our legitimate interests in defending and enforcing our rights • Establishment, exercise, or defense of legal claims
<p>Complying with legal obligations to which we are subject.</p>	<ul style="list-style-type: none"> • Compliance with a legal obligation
<p>Facilitating a sale, merger, consolidation, or other corporate transaction (e.g., transferring or assigning to third parties involved in a corporate transaction information concerning you).</p>	<ul style="list-style-type: none"> • Our legitimate interests in transferring our business or assets

In addition, we may aggregate the Personal Information we maintain about you. When we aggregate Personal Information, we may use and disclose such aggregated data for any purpose.

HOW DO WE DISCLOSE YOUR PERSONAL INFORMATION?

We may transmit each of the types of Personal Information identified in the “What Types of Personal Information Do We Process?” section above to the following recipients when you access, browse, navigate and/or use the Services:

Recipients	Purposes
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<p>Our Affiliates, including parent entities, subsidiaries, and other companies that share common ownership</p>	<p>For the management and provision of our Services; to enforce or apply our terms of use or other agreements; to protect the rights, property, or safety of the company, our customers, or others; and for other ordinary business purposes.</p>
<p>Our Service Providers, such as IT providers, data analytics providers, and companies that provide business support services</p>	<p>To help manage and provide our Services.</p>
<p>Business Partners, such as social media companies</p>	<p>To manage and provide our Services and the services of our business partners.</p>
<p>Administrative or Judiciary Authorities or Other Third Parties in Connection with Legal, Security, or Safety Reasons</p>	<p>To respond to a compelled subpoena, court order, or other legal process or government request; in case of an alleged violation of legal or regulatory provisions; or to establish or protect our legal rights or safety or those of others.</p>

<p>Professional Advisors, such as lawyers and auditors</p>	<p>To assist with technical, financial, or legal operations or in connection with audits or transactions.</p>
<p>Buyer or Other Successor or Other Entity Involved in a Corporate Transaction</p>	<p>To complete a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.</p>

<p>The public, including other users of our Services</p>	<p>To manage and provide our Services.</p>
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HOW DO WE HANDLE INTERNATIONAL TRANSFERS OF YOUR PERSONAL INFORMATION?

We are a global business and the information that we collect about you may be transferred to and stored in countries globally, including the United States, and shared with third parties in countries including the United States. If you are located in the European Economic Area (“EEA”), United Kingdom (“UK”), or Switzerland and we transfer your Personal Information to third parties in other countries that do not provide adequate legal protection for the processing of Personal Information, we will ensure that appropriate safeguards are implemented to secure such data transfers in compliance with applicable data protection laws, such as the appropriate Standard Contractual Clauses. For more information about the safeguards adopted by the Company, contact us at support@parti.com.

HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?

We will retain your Personal Information for as long as necessary for the purposes disclosed in this Privacy Policy, unless required by our legal obligations to retain it for longer. To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of data, the potential risk of harm from unauthorized use or disclosure of data, the purposes for which we process data, and all applicable legal, regulatory, and compliance requirements.

In addition, we will keep your Personal Information during:

- the statute of limitation, if needed for evidence purposes;
- the applicable legal retention periods, in particular regarding commercial, compliance, and regulatory matters, or any other mandatory retention period (such as legal hold or investigation).

For more information on how we retain your Personal information, contact us at support@parti.com.

COOKIES AND SIMILAR TECHNOLOGIES

We and third parties may use cookies and similar technologies to collect information about you, your device, and how you interact with the Services. We use these technologies to provide the Services, gather information about your usage patterns when you navigate our Services to enhance your personalized experience, secure the Services, and understand usage patterns to improve our Services. For example, we use Google Analytics to help us improve our Services. To learn how Google Analytics collects and processes data, please visit www.google.com/policies/privacy/partners.

WHAT SECURITY MEASURES HAVE WE IMPLEMENTED?

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the Internet is not completely secure. Although we take steps to protect your Personal Information, we cannot guarantee the security of it.

LINKS TO THIRD PARTY WEBSITES

Our Services might contain links or reference to the websites or other services of third parties. We are not responsible for the data collection or privacy practices of any third party. If you choose to visit a third party's linked website, the use of any information collected by that website will be governed by the privacy policy of the operator of that website, and not by this Privacy Policy. We encourage you to review the privacy policies of the operators of any third-party website prior to using the website.

CHILDREN'S PRIVACY

Our Services are not intended for use by, and we do not knowingly collect information from, individuals under the age of 16. If we determine that we have received the information of an individual under the age of 16 without the verifiable consent of the individual's parent or legal guardian, we will take steps to delete such information. If you are aware of an individual under the age of 16 providing his or her information to us without parental or guardian consent, please let us know using the contact information in the "Contact Us" section.

DO NOT TRACK SIGNALS

Web browsers and other technologies you may use to access our website may include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As a result, we do not currently respond to DNT browser signals.

EUROPEAN UNION, UK, AND SWITZERLAND PRIVACY RIGHTS

Where required by laws of the European Union ("EU"), UK, or Switzerland, you can exercise the rights described in this section by contacting us at support@parti.com.

Right to access. You are entitled to obtain confirmation from us as to whether we process Personal Information about you and, if we do, information about how we process it.

Right to rectification. You have the right to rectification of inaccurate, incomplete or outdated Personal Information concerning you.

Right to erasure. You have the right to request the erasure of your Personal Information in one of the following cases:

- The Personal Information is no longer necessary for the purpose(s) for which it was collected or otherwise processed;
- You withdraw the consent on which the processing was based, and we have no other legal grounds for the processing;
- You object to the processing, as provided in the "Right to object" paragraph below and there are no overriding legitimate reasons to continue processing your Personal Information;

- Your Personal Information has been unlawfully processed;
- Your Personal Information has to be erased for compliance with a legal obligation.

Right to restriction. You have the right to obtain restriction of processing in the following cases:

- Where you claim your Personal Information is inaccurate, in which case we will restrict processing for period necessary to enable us to verify the accuracy;
- Where the processing appears unlawful and you oppose the erasure and request the restriction of use of your Personal Information instead;
- Where we do not need your Personal Information, but it is required by you for the establishment, exercise or defense of legal claims; and
- Where an objection is raised by you in relation to the processing, while we determine whether we have sufficient legitimate grounds for the processing.

Right to object. As a general rule, you have the right to object, at any time and on legitimate grounds relating to your particular situation, to the processing of your Personal Information based on our legitimate interests. You may also object to our processing of your Personal Information for direct marketing purposes. Provided that such objection is justified, we will no longer process the Personal Information concerned unless we can demonstrate sufficiently compelling legitimate grounds for the processing.

Right to data portability. You may request that we (i) transmit your Personal Information to you, in a structured, commonly used and machine-readable format, or (ii) to directly transmit such Personal Information to another data controller, if technically feasible.

Right to withdraw consent. Where the processing of your Personal Information is based on consent, you have the right to withdraw such consent at any time without affecting the lawfulness of processing before your withdrawal.

Right to lodge a complaint. You have the right to lodge a complaint with your local supervisory authority concerning our processing of your Personal Information.

CALIFORNIA “SHINE THE LIGHT“ LAW

If you are a California resident, you may request certain information regarding our disclosure of certain categories of Personal Information to third parties for those third parties' direct marketing purposes. To make such a request, please contact us at support@parti.com. This request may be made no more than once per calendar year, and we reserve our right not to respond to requests submitted other than to the email address specified above.

CALIFORNIA ERASER LAW

California residents under the age of 18 who have posted content or information on our Services can request removal by contacting us at support@parti.com. The request should explain where the content or information is posted and include an attestation that the requestor posted it. We will make reasonable, good faith efforts to remove the post from prospective public view or anonymize it so the minor cannot be individually identified to the extent required by applicable law. This removal process cannot ensure complete or comprehensive removal. For instance, third parties may have republished or archived content that we do not control.

NEVADA PRIVACY RIGHTS

If you are a Nevada resident, you have the right to opt out of the sale of certain personal information to third parties. We do not "sell" your personal information as defined by Nevada law. If that were to change in the future, we will provide Nevada residents with a method to opt-out of those transactions.

CHANGES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy. If we do, we will notify you by posting the updated version of the Privacy Policy to the website. Where required by law, we will also notify you that we have updated the Privacy Policy. We encourage you to check this page regularly to stay current on our privacy practices.

CONTACT US

If you have any questions, concerns, or would like to know more about this Privacy Policy or our privacy practices, you can email us at:

support@parti.com