

## PRIVACY POLICY

*Last updated : 18 June 2025*

Welcome to the Virtuals Platform (accessible at <https://app.virtuals.io/>) (the “**Website**”), provided and operated by the Virtuals Protocol (the “**Company**”, “we”, “our” or “us”).

We take your privacy rights and the protection of personal data very seriously, and strive to collect, use, disclose and process any personal data collected in a manner that complies with applicable data protection and privacy legislation.

This Privacy Policy sets out what personal data we collect, how we use and share your personal data, and your choices concerning our information practices. This Privacy Policy is incorporated into and forms part of our Platform’s Terms of Use which is located at [https://app.virtuals.io/terms\\_of\\_use.pdf](https://app.virtuals.io/terms_of_use.pdf) (the “**Terms**”).

Before accessing and using the Platform, Website or any of the content made available thereon (“**Content**”), or submitting any personal data to the Company via the Website, please read through this Privacy Policy and review it carefully. By accessing and/or using the Platform, Website or Content, you agree to our collection, use, disclosure and processing of your personal data as set out in this Privacy Policy. If you do not agree to this Privacy Policy, please do not access or use the Website or any of our Content.

The Company reserves the right to modify this Privacy Policy at any time and encourages you to review this Privacy Policy each time you access the Website.

### **DEFINITIONS AND INTERPRETATION**

1. “**Personal data**” (or “**personal information**” as the case may be) in this Privacy Policy shall have the meaning given to it in the Data Protection Legislation.
2. Capitalised terms in this Privacy Policy shall have the meaning given to them in the Terms, unless the context requires otherwise.

### **UPDATES TO THIS PRIVACY POLICY**

3. We may revise this Privacy Policy from time to time without any prior notice. By continuing to access and/or use the Website or any of the Content made available therein, you are deemed to acknowledge and accept such changes to this Privacy Policy.

### **WHAT PERSONAL DATA WE MAY COLLECT**

4. In order to access and/or use the Website, Platform and any of the Content made available therein, you may be required to provide us and we may collect the following categories of personal information:
  - (a) Identification Information: Name, email address, social media handle and phone number (as the case may be) for any communication or marketing purposes.
  - (b) Wallet Information: Details of your Digital Wallet (such as the wallet address) when you create or link your Digital Wallet with the Website.

- (c) Transaction Information: Details on wallet balance and the transaction history from your Digital Wallet (such as deposit and withdrawals) when you utilize functions on the Platform (including without limitation the Staking Feature).
- (d) Communication Information: Information you share with us as part of any enquiries, emails, surveys, or feedback.
- (e) Social Media Information: Information received from your interactions with our social media platforms or information provided by the social media platforms, including aggregate information and analytics of our followers or viewers.
- (f) Internet Activity Information: When you visit, use, or interact with the Website or any of the Content made available therein, the following information may be created and automatically logged in our systems:
  - a. Device Information: The manufacturer and model, operating system, IP address and unique identifiers of the device, as well as the browser you use to access the Website. The information we collect may vary based on your device type and settings.
  - b. Usage Information: Information about how you use our Website, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency, and duration of your activities.
  - c. Email Open/Click Information: We may use pixels in our email campaigns that allow us to collect your email and IP address as well as the date and time you open an email or click on any links in the email.

## **WHEN WE MAY COLLECT, USE AND/OR DISCLOSE YOUR PERSONAL DATA**

5. We generally do not collect your personal data:
  - (a) if you are just visiting or browsing the Website without connecting or linking your Digital Wallets;
  - (b) unless it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided consent (whether written or by conduct) to the collection and usage of your personal data for those purposes; or
  - (c) collection and use of personal data without consent is permitted or required by the Data Protection Legislation or other laws. We will seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
6. We may collect and use your personal data for any or all of the following purposes:
  - (a) performing obligations in the course of or in connection with allowing you access or use of our Website and Platform and any of the Content made available therein;
  - (b) performing KYC/AML or other forms of background checks and assessments;
  - (c) assessing and facilitating applications to the Virtuals Partner Network;
  - (d) verifying your Digital Wallet or identity, where we are required to do so (whether by law or otherwise);

- (e) provision of the Website and any of the Content made available therein, including to provide, operate, maintain, and secure the Website and any of the Content made available therein;
  - (f) processing payments for transactions made on or through the Website;
  - (g) marketing and advertising purposes, including to send you direct marketing communications as permitted by law, and notify you of special promotions, offers and events by email and other means;
  - (h) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
  - (i) managing your relationship with us;
  - (j) contacting you in respect of any matters relating to transactions made on or through the Website;
  - (k) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
  - (l) any other purposes for which you have provided such information;
  - (m) transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Panama or abroad, for the aforementioned purposes; and
  - (n) any other incidental business purposes related to or in connection with the above.
7. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

#### **WHEN YOUR PERSONAL DATA MAY BE DISCLOSED TO THIRD PARTIES**

8. We may disclose your personal data described above to third parties or in specific situations without further notice to you, unless required by applicable law. Such disclosures may occur in the following instances:
- (a) Performance of Services: When necessary for fulfilling obligations related to transactions made on or through the Website, or your access and use of the Website and/or any Content made available therein, we may disclose personal data to third parties involved in delivering these services.
  - (b) Service Providers: To support our business operations and provide certain services, we may share personal data with third-party providers, partners, affiliates, and service providers. This includes those offering hosting and cloud services, IT support, email communication and newsletter services, advertising and marketing services, payment processing, customer relationship management, customer support, and analytics services. These third parties may access, process, or store personal data as needed to perform their functions, in accordance with our instructions.
  - (c) Professional Advisors: We may share personal data with our professional advisors, such as legal and accounting firms, when necessary for them to provide services to us.
  - (d) Business Transfers: If we are involved in a merger, acquisition, financing, reorganization, bankruptcy, receivership, dissolution, sale of all or a portion of

our assets, or transition of service to another provider (collectively a “**Business Transaction**”), your personal data may be shared in the diligence process with counterparties and others assisting with the Business Transaction and transferred to a successor or affiliate as part of or following that Business Transaction along with other assets.

- (e) Legal Requirements: While we do not voluntarily share personal data with government authorities or regulators, we may disclose your information when required to do so by law, regulation, court order, or other legal obligation.
9. Your personal data may be made publicly available in certain instances, including when you:
- (a) post any content on our Website; and
  - (b) make any social media posts with your social media accounts which we may repost or share on our own social media platforms.
10. For the purposes of registration, verification or provision of any of our Content, we may rely on third parties who may collect, use, disclose or process your personal data for their own purposes, and without our involvement or reference to us. We are not liable or responsible for the collection, use, disclosure or processing of your personal data by such third parties.

## **USE OF COOKIES AND OTHER TECHNOLOGIES**

11. We may deploy one or more of the following technologies to collect Internet Activity Information in order to enhance your user experience, understand how you interact with any of the Content made available on the Website, and improve our offerings:
- (a) Cookies: These are small text files placed on your device that allow us to uniquely identify your browser or store information and settings. Cookies help improve your experience by enabling smooth navigation between pages, remembering your preferences, supporting specific functionalities, analyzing user activity and patterns, and facilitating targeted advertising.
  - (b) Local Storage Technologies: Technologies such as HTML5 may be used to provide functionality similar to cookies but with the ability to store larger amounts of data. This information can be stored directly on your device, including outside your browser, in relation to specific applications.
  - (c) Web Beacons (Pixel Tags/Clear GIFs): These help us confirm when a webpage or email has been accessed or opened, or when specific content has been viewed or clicked. Web beacons are typically used to track user engagement and optimize the content we deliver.
  - (d) Data Analytics Tools: We may use technologies and tools provided by third party partners to collect information from our users through the Website in order to better understand their needs and usage patterns, which can be used to inform future improvements to the Website and provide a more personalized experience. Information being collected may include, without limitation, the following:
    - i. Users, pageviews, sessions
    - ii. Source (e.g. Google, social, direct)
    - iii. Time spent on site

- iv. Users info (geographical location, browser type and language, device type and operating system)

For instance, we use the Google Analytics tool on the Website. For more information, please visit Google Analytics' Privacy Policy. To learn more about how to opt-out of Google Analytics' use of your information, please click [here](#).

## **WITHDRAWING YOUR CONSENT**

- 12. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to us at the contact details provided below.
- 13. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within fourteen (14) business days of receiving it.
- 14. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue to grant you access and/or use of the Website and/or any of the Content made available therein and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us via email.
- 15. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

## **HOW TO ACCESS OR CORRECT OR REQUEST FOR THE DELETION OF YOUR PERSONAL DATA**

- 16. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, (b) a correction request to correct or update any of your personal data which we hold about you, or (c) a deletion request for us to delete all the personal data we have about you, you may submit your request via email to us at the contact details provided below.
- 17. Please note that a reasonable fee may be charged for an access request or deletion request. If so, we will inform you of the fee before processing your request. Please further note that we will need to verify your identity in order to honour a deletion request.
- 18. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in

writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data, make a correction requested by you, or honour a deletion request, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the Data Protection Legislation).

### **SAFEGUARDING YOUR PERSONAL DATA**

19. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have or will implement appropriate administrative, physical and technical safeguards. These include limiting the collection of personal data, enforcing strong authentication and access controls (such as secure password practices and restricting data access to a need-to-know basis), encrypting data, maintaining up-to-date antivirus protection, regularly updating our operating system and other software, securely erasing storage devices before disposal, applying web security measures against risks, and conducting regular security reviews and testing.
20. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures. However, no security measures are failsafe, and we cannot guarantee the security of your personal data. You use the Website and/or any of the Content made available therein at your own risk.

### **ACCURACY OF PERSONAL DATA**

21. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is up-to-date, complete and accurate, please update us if there are changes to your personal data by via email at the contact details provided below. Failure to do so may affect or impact your continued use of the Website and/or any Content made available therein.

### **WHEN WE MAY RETAIN YOUR PERSONAL DATA**

22. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
23. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

### **INTERNATIONAL TRANSFERS OF PERSONAL DATA**

24. We generally do not transfer your personal data to countries outside of your country of origin and Panama. However, we may be required to do so in order to complete the fulfilment of any transactions made by you on or through the Website (for example, if we were to facilitate a registration for an event held outside of your country or Panama).
25. Apart from as stated in Clause 24 above, we will obtain your consent for the transfer of any personal data to countries outside of your country of origin and Panama and we will take steps to ensure that your personal data continues to receive a standard

of protection that is at least comparable to that provided under the Data Protection Legislation.

### **HOW TO CONTACT US**

26. If you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, you may contact us by this email:

Email Address: [hello@virtuals.io](mailto:hello@virtuals.io)