Privacy Policy

LAST UPDATED: 09 April, 2025.

We value our users. We are committed to protecting your right to privacy. When you visit our platform (the 'Platform') you provide us with your Personal data. The primary task this Privacy Policy aims to is to explain in the clearest and precise way what Personal data we collect, how we use it, how we share it and what rights you can exercise.

We rely on our users. We hope that you spend some of your time to read this Policy. If there are any terms you do not agree with please discontinue your use of our Platform.

The processing of Personal data is regulated by the European Union General data Protection Regulation EU 2016/679 (hereinafter referred to as the "GDPR"), California Consumer Privacy Act (hereinafter referred to as the "CCPA"), and applicable privacy laws.

Contact us anytime via: privacy@getblock.io

Who We Are

The data controller in respect to GetBlock LLC. (or "we").

Registration number: 21835790

Registered address: Smiljanićeva 6, Vračar Belgrade, 11118, Serbia

What Data We Collect and How We Collect It

The term 'Personal data' refers to any information relating to an identified or identifiable natural person, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, economic, cultural or social identity of you as a natural person.

We collect personal data that you **directly** or **indirectly** provide to us when registering at Platform, expressing an interest in using our service or when participating in our activities or otherwise contacting us.

The personal data we collect depends on the context of your interactions with us, the choices you make and the products and features you use. We also collect or generate personal data when third parties provide information about you, or provided in the course of providing our services, and we may collect personal data from other sources, for example, to keep your information up to date using publicly available sources. The personal data we process can include the following:

1. Data provided by you directly

Identification Data

We collect your identification data including e-mail address. Besides, we collect your Telegram ID, Discord ID, and other similar social media contact data you provide to communicate with us.

Credentials Data

We collect your passwords and similar security data used for authentication and account access.

2. Data provided by third parties

We will use the information we receive only for the purposes that are described in this Policy or that are otherwise made clear to you on the Platform. Please note that we are not responsible for the ways in which any third party service provider processes any of your personal data and encourage you to read their privacy notices and policies for further information on how they process your Personal data.

All personal data that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal data.

Service Providers Data	We provide you with the option to register using any service provider's account details like your Google account or Metamask account. Where you choose to do this, we will receive certain profile information about you from such third party service providers. The profile information we receive may vary depending on the service provider concerned, but such information may often include your name, e-mail address, profile picture as well as other information you choose to make public. When you register with GetBlock via your MetaMask account, we collect your wallet address to identify you.
Marketing, Analytics and Advertising Data	Identifiers – the IP address, or other online identifiers of a person, e-mail address if used for direct marketing, and name and address Browser/web history data and preferences expressed through selection/viewing/purchase of goods, services and content, information about your mobile device including (where available) type of device, device identification number, mobile operating system. Analytics and profiles of the individuals based on the data collected on them, including UTM, referral links, and Compute Unit (CU) consumption tracking to optimize resource allocation.For more information about this please see our Cookie Policy. Interests or inferred interests and marketing preferences.
Retail Merchant Data	If you use your account to conduct a transaction with a third party merchant, the merchant may provide us with data about you, such as your name and contact details, and your transaction with that merchant.

Blockchain Data

When you connect your MetaMask blockchain wallet to the Platform, we collect and log your publicly-available blockchain address to learn more about your use of the Platform. Note that blockchain addresses are publicly-available data that are not created or assigned by us or any central party, and by themselves are not personally identifying.

3. Data collected automatically We automatically collect certain information through cookies, ReCAPTCHA technology and similar technologies when you visit, use or navigate the Platform.

This information does not reveal your specific identity (like your name or contact information) and does not allow us to identify you, but helps us address customer support issues, improve the performance of our sites and services, maintain and or improve your user experience, and protect your account from fraud by detecting unauthorized access.

Specifically, as the RPC provider, we do not store your IP address, country, location and similar data that allow to identify you.

Category of Data	Description
Browsing Data	Information about the device, operating system, and browser you're using Other device characteristics or identifiers (e.g. plugins, the network you connect to) IP address Device name Country Location Preferred language
Usage Data	Activity information: information about what you view or click on while visiting our Platform and how you use our Service Diagnostic and Troubleshooting Information: Information about how our Platform is performing when you use them, i.e. service-related diagnostic and performance information, including timestamps, crash data, Platform performance logs, and error messages or reports
Information from cookies and similar technologies	See our <u>Cookie Policy</u> for more information

How We Use Your Personal Data

We use your Personal data primarily for the following purpose - to enable efficient, optimal and adapted use of Platform.

To create and maintain your account	Identification Data Credentials Data Service Providers Data	Performance of the contract
To provide Service to you	Identification Data Credentials Data Service Providers Data Retail Merchant Data Blockchain Data Usage Data	Performance of the contract
To provide customer support services	Identification Data Service Providers Data Retail Merchant Data Blockchain Data	Performance of the contract
To facilitate you payment and billing	Identification Data Service Providers Data Retail Merchant Data Blockchain Data	Performance of the contract
To customize your experience	Identification Data Browsing Data Usage Data	Performance of the contract
To send you service communications and to ensure timely and appropriate processing of user's queries, requests, and replies	Identification Data Browsing Data Usage Data	Performance of the contract
To diagnose and fix issues with Platform	Identification Data Service Providers Data Usage Data	Performance of the contract

To enable us to perform statistical and other analysis and to improve our Platform	Identification Data Marketing, Analytics and Advertising Data Browsing Data Usage Data	Legitimate interest
To provide direct marketing communications and promotions	Identification Data Service Providers Data Marketing, Analytics and Advertising Data	Consent
To analyze the Platform and target ads	Identification Data Service Providers Data Browsing Data Usage Data Blockchain Data	Consent
To enable device-based settings	Information from cookies and similar technologies	Performance of the contract
To comply with legal requirements and law enforcement requests	Identification Data Service Providers Data Retail Merchant Data Blockchain Data Usage Data	Legal obligations
To conduct business planning, reporting, and forecasting	Browsing Data Usage Data	Legitimate interest
To establish, exercise, or defend legal claims	Identification Data Service Providers Data Retail Merchant Data Blockchain Data	Legitimate interest

Consent: if the processing of Personal data is carried out based on your specific consent, you have the right to withdraw it at any time by sending us a request to privacy@getblock.io or following the instruction given in our Cookie Policy.

Legitimate interest: we may process your Personal data when it is reasonably necessary to

achieve our legitimate business interests. In addition, we may disclose your Personal data where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

Legal obligations: we may disclose your Personal data where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

Performance of the contract: where we have entered into a contract with you, we may process your Personal data to fulfill the terms of our contract, and for the following purposes: to provide support services, to maintain your account, to send you communications.

We may combine all the information we collect from or receive about you for the outlined purposes. We may aggregate or de-identify your information and may use or share aggregated or de-identified information for any purpose, and such information is not subject to this Privacy Policy.

What About Cookies?

We may use cookies and similar tracking technologies to access or store Personal data.

You may refuse the use of cookies by selecting the appropriate settings on your browser. Note however that this may affect your experience of our Platform.

Please read our <u>Cookie Policy</u> to understand how we collect data via cookies technology.

How We Share Your Personal Data

We do not sell your Personal data as the term "sell" is traditionally understood. However, your Personal data will be transmitted to third parties that we use to provide our services; these parties have been rigorously assessed and offer a guarantee of compliance with the legislation on the processing of personal data. These parties have been designated as data processors and carry out their activities according to the instructions given by us and under our control.

We may share your Personal data with the following categories of third parties:

- 1) Service Providers. We may share your Personal Data with our third-party service providers and vendors that assist us with the provision of our Service. This includes service providers and vendors that provide us with IT support, security, hosting, payment processing, analytics, alerting, customer service, and related services. We may allow selected third parties to use tracking technology like a ReCAPTCHA technology on the Platform, which will enable them to collect on our behalf data about how you interact with the Platform over time. This data may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity.
- 2) Third-Party Service you share or interact with. Certain features and functionalities of our Service may link to or allow you to interface, interact, or share information with, access and/or use third-party websites, services, products, and technology (collectively, "Third-Party Services"). Any information shared with or otherwise collected by a Third-Party Service may be subject to the Third-Party Service's privacy policy. We are not responsible for the processing of personal information by Third-Party Services.
- 3) Business Partners. We may share your personal information with business partners to provide you with a product or Service. We may also share your personal information with business partners with whom we jointly offer products or services.

4) Affiliates. We may share your personal information with our company affiliates, if any.
5) Legal authorities: We may be required by law or by judicial authorities to disclose certain information about you or any engagement we may have with you to relevant regulatory, law enforcement and/or other competent authorities. We will disclose information about you to legal authorities to the extent we are obliged to do so according to the law. We may also need to share your information to comply with Anti-Money Laundering, Terrorist Financing and Transfer of Funds laws, prevent fraud, enforce an agreement we have with you, or to protect our rights, property or safety, or the rights, property or safety of our employees or others.

Our servers are located in Germany in full compliance with the data protection regulation.

To ensure that the Personal data is safeguarded, stored, and processed in a secured way we use Standard contractual clauses (SCC) adopted by the European Commission as a mechanism to transfer data from the EU countries. Our partners established in countries with an inadequate level of protection of personal data have adopted SCC, as appropriate, to ensure confidentiality, security, and legality of the processing of your personal data.

How We Store Your Personal Data

We store your Personal data as necessary for providing you the Service, compliance of our legal obligations, fulfillment of our legitimate interests, or during the validity of your consent as stated in this Privacy Policy. As soon as information stops serving these purposes we delete it. After you close your account and/or upon your request we will delete and/or anonymize your Personal data without undue delay, but no later than 30 days. We will keep some Personal data that we are allowed or required to maintain, in such cases as:

If there is an unresolved issue relating to your account, such as an outstanding credit on your account and/or an unresolved claim and/or dispute - we will retain the necessary Personal data until the said issue is resolved;

Where necessary to comply with legal, tax, audit, and accounting obligations and/or any other legal obligation, we will retain the necessary Personal data for the period required by the applicable law:

Where necessary to fulfill our legitimate interests such as fraud prevention and/or maintenance of our Users' security.

How We Keep Your Personal Data Safe

We have implemented appropriate technical and organizational security measures designed to protect the security of any Personal data we process and to protect your Personal data from unauthorized access, use, disclosure, alteration or destruction.

For instance, we follow industry leading practices for securing data using secure socket encryption (HTTPS) on transmission and utilizing encryption services provided by Google Cloud.

However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your Personal data, transmission of Personal data to and from our Platform is at your own risk. You should only access the services within a secure environment.

What Are Your Rights?

- 1. Right to ACCESS You may request a copy of your Personal data and/or the way we store your Personal data.
- 2. Right to RECTIFY You may request to change some of your Personal data and/or correct your Personal data if this is inaccurate.

3. Right to DELETE/ERASURE - You may request to delete all or some of your Personal data, for example, if:

they are no longer needed for any processing purposes consent has been used as a legal basis for their processing there is no legitimate interest in the further processing of Personal data

- 4. Right to OBJECT You may object to the processing of your Personal data on grounds relating to your particular situation and/or to object processing your Personal data for direct marketing purposes.
- 5. Right to object to AUTOMATED PROCESSING You may object to a decision based on automated processing. This means that you may request to review your Personal data manually if you believe that automated processing of your Personal data may not consider your unique situation.
- 6. Right to DATA PORTABILITY You may request to provide you a copy of your Personal data in a structured, commonly used, and machine-readable format (e.g. xml, csv). Furthermore, you have the right to request to transmit the said Personal data directly to another controller 7. Right to WITHDRAW YOUR CONSENT to the extent the processing of your personal information is based on your consent, you may withdraw your consent at any time. The lawfulness of processing before you withdraw your consent will not be affected by such withdrawal:
- 8. Right to NON-DISCRIMINATION we will not discriminate against you for exercising any of your rights provided to you under law;
- 9. Right to lodge a COMPLAINT You have the right to lodge a complaint with a supervisory authority, in particular to the member state of the European Union of your habitual residence, place of work, or place of the alleged infringement.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal data, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html

Please contact us by email at privacy@getblock.io to exercise your rights.

California Residents Privacy Notice

California Consumer Privacy Act (CCPA) provides our users who are California residents, with the following rights listed below in relation to personal information that we have collected about you. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- 1. Right to know. You have a right to request the following information about our collection, use and disclosure of your personal information over the prior 12 months, and ask that we provide you with a copy of the following:
- categories of and specific pieces of personal information we have collected, sold, or shared about you;
- categories of sources from which we collect personal information;
- the business of commercial purposes for collecting personal information;
- categories of third parties to whom the personal information was disclosed for a business purpose; and
- categories of personal information disclosed about you for a business purpose.
- 2. Right to correct. You have a right to request that we correct inaccurate personal information maintained about you.
- 3. Right to delete. You have a right to request that we delete personal information, subject to certain exceptions.
- 4. Right to opt out of Selling or Sharing. You have the right to direct a business that sells or shares personal information about you to third parties to stop doing so.
- 5. Right to non-discrimination. We will not discriminate against you for exercising any of these rights.

We do not sell the data of users under 16 years of age, unless affirmatively authorized, as specified, to be referred to as the right to opt in. The act will prescribe requirements for receiving, processing, and satisfying these requests from consumers. The act will prescribe various definitions for its purposes and would define "personal information" with reference to a broad list of characteristics and behaviors, personal and commercial, as well as inferences drawn from this in

Please contact us by email at privacy@getblock.io to exercise your rights.

Personal Data Breach

A Personal data breach may, if not addressed in an appropriate and timely manner, result in a physical, material, or non-material risk to your rights and freedoms. Therefore, as soon as we become aware that a Personal data breach has occurred, we will notify the Personal data Breach to the Commissioner for Personal data Protection without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless we are able to demonstrate, following the accountability principle, that the Personal data breach is unlikely to result in a risk to your rights and freedoms. Where such notification cannot be achieved within 72 hours, the reasons for the delay should accompany the notification without undue further delay.

What About Minors?

We do not knowingly solicit data from or market to minors without the consent of their parents. For the purpose of this Privacy Policy, a minor means any individual who is under 13 in the United States or under 16 in the European Union (or the minimum legal age to consent to the collection and processing of Personal data where this is different under applicable law). If we learn that personal data from minors has been collected, we will deactivate the account and take reasonable steps to delete such data from our records unless parental consent is received. Please contact us at privacy@getblock.io if you become aware of any data we have collected from minors or you would like to provide parental consent.

Nothing Lasts Forever

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated 'LAST UPDATED' date and the updated version will be effective as soon as it is accessible for our users. If we make any updates that affect our user's privacy significantly, we may notify you directly by sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your data.