

# PRIVACY POLICY



Effective Date as of April 12, 2024

Fozeus company, referred to herein also as “Fozeus”, “we”, “us” or “our” is committed to protecting user (also referred as “you”) privacy as outlined below. This document, along with the Terms of Use, outlines different ways that Fozeus will interact with user data and was written in accordance with the Personal Data Protection Act directive and General Data Protection Regulation. Fozeus performs the actions with data from those who visit or use our website <https://fozeus.me>, applications and other products.

User acknowledges and gives consent to this data collection and to our Privacy Policy as a whole by using our Website, Services and Products.

## **PERSONAL INFORMATION WE COLLECT**

The categories of personal information we collect depend on how you interact with us, our Services and the requirements of applicable law. We collect personal information that you provide to us, personal information we obtain automatically when you use our Services, and personal information from other sources such as third-party services and organizations, as described below.

### **A. Information You Provide to Us Directly**

We may collect the following personal information that you provide to us.

**Purchases, Wallet and Transaction Information.** In order to engage in certain transactions or purchases on the Services, you may need to provide us or our third-party payment processors with your payment information and allow us to connect to your digital wallet by providing us with your public wallet address. We will never ask you or collect your private keys. We do not directly collect or store any payment card information entered through our Services or access your digital wallet, but we may receive from our third-party payment processing providers information associated with your payment card information (e.g., your billing details). We may also collect your name, the name of the recipient, email address, the currency and the date as part of the transactions taking place on the Services.

**Supplemental Identity Verification Information.** In order to support Fozeus’ legal and regulatory compliance efforts, Fozeus may engage third-party identity verification vendors in order to verify your identity. These vendors may ask you to submit or request access to your mobile device’s camera to collect photographs and/or videos, government-issued identity documents, e.g. passport, driver’s license, or state identification card, Social Security number, employment information (e.g. company name), or proof of residency, including visa information, and may also perform a live facial scan and capture other biometric information generated based on photos or videos.

**Other Transactions.** We may collect personal information and details associated with your activities on our Services.

**Your Communications with Us.** We may collect personal information, such as email address, phone number or mailing address when you request information about our Services, register for our newsletter, apply for a job or otherwise communicate with us.

**Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., via the Fozeus communities on Fozeus SocialFi, messaging and chat features, and social media pages). Such personal information may include photos, avatars, or other images that you upload and usernames that include personal or biographic information. Any personal information you

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provide on the public sections of these features will be considered “public,” (the “User Content”) unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein. Please exercise caution before revealing any information that may identify you in the real world to other users.

**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.

**Sweepstakes, Giveaways or Contests.** We may collect personal information you provide for any sweepstakes, giveaways or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.

**Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.

**Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.

## B. Information Collected Automatically

We may collect personal information automatically when you use our Services such as:

**Automatic Data Collection.** We may collect certain information automatically when you use our Services, such as your browser or device information, location information (including approximate location derived from IP address), and metadata about the content you provide. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.

**Game Usage Information.** If you play any of the games that we or our third-party developer partners (the “Developer Partners”) offer, we and our Developer Partners may collect information about your in-game information and actions (e.g. your public wallet address, the number of games you play, and your in-game spend). If you play any of these games, you may also be subject to the privacy policies of our Developer Partners, so we encourage you to read and understand their privacy policies.

**Cookies and Other Technologies.** We, as well as third parties that provide content or other functionality on our Services, may use cookies, local storage, and other technologies (“Technologies”) to automatically collect information through your use of our Services.

Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.

- **Analytics.** We may use tools to process analytics information on our Services. These technologies allow us to process usage data to better understand how our Services are used, and to continually improve our Services.
- **Social Media Platforms.** Our Services may contain social media buttons, such as Fozeus SocialFi and others, which might include widgets such as the “share this” button or other interactive mini programs). These features may collect your IP address and which page you are visiting on our Services and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

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You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs may not be effective on mobile applications.

## C. Information Collected from Other Sources

**Third-Party Sources.** We may obtain information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made available via your privacy settings. Your access through a third-party application may also subject you to the privacy policies of such third parties, so we encourage you to read and understand their privacy policies

**Sharing Features.** Our Services may offer various tools and functionalities that allow you to provide information about your friends; third parties may also use these services to upload information about you. Our Services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share with us contact information of people if you have their express consent.

## HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and services, as described below.

If your personal information is subject to the General Data Protection Regulation or UK General Data Protection Regulation, our processing of your personal information will be under one of the following lawful bases:

- **Performance of a Contract.** We may process your personal information to carry out our contract with you or to take steps at your request prior to entering into a contract. For further details, see Section 4(A).
- **Legitimate Interest.** We may process your personal information to further our legitimate interests, but only where our interests are not overridden by your interests or fundamental rights and freedoms. For a detailed list of our legitimate interests, see Sections 4(B).
- **Compliance with Legal Obligations.** We may process your personal information to comply with our legal obligations as detailed in Section 4(B).
- **Consent.** In some cases, we may also rely on your consent to process your personal information for a specific purpose as detailed in Section 4(C).

## A. Processing Necessary for Us to Provide Our Services

We process your personal information to perform our contract with you and provide you with our Services including by:

- Managing your information;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing your financial information and other payment methods to facilitate purchases and transfers via the Services; and

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- Allowing you to register for events.

## **B. Administrative Purposes**

We use your personal information for our legitimate interests, such as:

- Conducting marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services; improving, upgrading or enhancing our Services; developing new products and Services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transfers and other compliance activities;
- Sharing information with third parties as needed to provide the Services;
- Sending you news and/or marketing communications (by email, phone, or text), subject to your marketing preferences and choices, including information about us or third party offerings that we think may be of interest to you;
- Enforcing our agreements and policies;
- Administer contests, surveys, and sweepstakes you enter, notify contest winners, and award prizes; and
- Other uses as required to comply with our legal obligations, applicable laws, regulations, regulators and authorities.

## **C. Marketing our Products and Services**

We may use personal information to tailor and provide you with content. We may provide you with these materials as permitted by applicable law. Some of the ways we may market to you include email campaigns.

If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in "Contact Us" below.

## **D. With Your Consent**

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information and for which you provide your consent.

## **E. Other Purposes**

We also use your information for other purposes as permitted by applicable law.

**De-identified and Aggregated Information.** We may use personal information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, de-identified location information, information about the device from which you access our Services, information about how you use the Services, or other analyses we create. De-identified and/or aggregated information is not personal information, and we may use, disclose, and retain such information as permitted by applicable laws including, but not limited to, for research, analysis, analytics, and any other legally permissible purposes.

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## HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

### A. Disclosures to Provide our Services

The categories of third parties with whom we may share your information are described below.

**Notice Regarding Use of Blockchain.** Transactions involving our NFTs will be conducted on the relevant Protocol. Information about your transfers will be provided to the blockchain and may be accessible to third parties due to the public nature of the blockchain. Because entries to the blockchain are, by their nature, public, and because it may be possible for someone to identify you through your pseudonymous, public wallet address using external sources of information, any transaction you enter onto the blockchain could possibly be used to identify you, or information about you. Please note that once your information is uploaded onto or otherwise recorded on the blockchain, it cannot be deleted.

**Other Users of the Services and Parties You Transact With.** Some of your personal information may be visible to other users of the Services (e.g., information featured on generally accessible parts of the contracts or on a user profile). In addition, to complete transfers via the Services, we will need to share some of your personal information with the party that you are transacting with.

**Third Party Websites and Applications.** You may choose to share personal information or interact with third-party websites and/or third-party applications, including, but not limited to, third-party electronic wallet extensions. Once your personal information has been shared with a third-party website or a third-party application, it will also be subject to such third party's privacy policy. We encourage you to closely read each third-party website or third-party application privacy policy before sharing your personal information or otherwise interacting with them. Please note that we do not control, and we are not responsible for the third-party websites' or the third--party applications' processing of your personal information.

**Service Providers.** We may share your personal information with our third-party service providers who use that information to help us provide our Services. This includes service providers that provide us with IT support, hosting, Game Usage Information, customer service, and related services.

**Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information to business partners with whom we jointly offer products or services.

**Affiliates.** We may share your personal information with members of our corporate family.

**APIs/SDKs.** We may use third-party application program interfaces ("APIs") and software development kits ("SDKs") as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in "Contact Us" below.

### B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with

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law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

## **C. 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, your information may be sold or transferred as part of such a transaction, to the extent permitted by law.

## **LEGAL GROUND FOR COLLECTING**

Consent the freely given, informed, and unambiguous indication of your wishes to the processing of your personal data and company-related data for a specific purpose which signifies agreement to the processing of personal data and company-related data.

Services - if data necessary for us to perform our services or terms of use to which you are a party or in order to take steps at your request prior to entering into the services.

Legal obligations - if data is necessary for compliance with a legal obligation to which Fozeus is a subject.

Legitimate Interests - a legal ground for the processing of your personal and company-related data when it is based on our legitimate interests or the legitimate interests of a third party, provided that those interests are not outweighed by your rights and interests and those interests have a specific purpose, they are necessary, and they are balanced.

## **WHO ELSE WILL SEE USER DATA**

Fozeus uses personal information and company-related information gathered from our users in accordance with legal regulations. We may distribute personal information and company-related information to third parties such as affiliates, financial institutions, representatives, legal staff, partners, and contractors. Users acknowledge and agree that data storage, collecting and processing might be performed with third party service providers.

Information may also be shared with law enforcement or regulatory bodies in accordance with local laws.

Third parties are required to protect your personal information and company-related information and use it only for the purposes stated, such as performing a service for Fozeus. All third parties are bound to comply with our privacy policy, with the exception of law enforcement and regulatory bodies.

Partners and other Third Parties are responsible for processing and obligated to legally keep and use your personal information and company-related information. Partners may include Fozeus representatives or affiliate parties. Payment processors, financial institutions, and services responsible for verifying your identification for security purposes are examples of other possible data processors involved in our personal data and company-related data processing system.

Fozeus websites and applications may link to other sites and online third-party tools and resources. Our privacy policy does not apply to these third-party entities, but to our websites and applications only.

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Third-party sites and resources are not under our control, and we accept no liability for the use of these sites and resources including losses, technical failures, damages, or any other undesirable outcomes. Users are advised to familiarise themselves with the terms of use and privacy policies for third party sites and resources. Please read their privacy policies before you submit any data to them.

## **LEGAL RIGHTS OF USERS**

Fozeus users may request access to their personal data and company-related data which we store. You may request that we make accurate adjustments to your data, or that we erase your data. You have the right to object to us processing your data or to change your mind regarding the permissions we have to interact with your data.

You can contact us at [hello@fozeus.me](mailto:hello@fozeus.me) for any of the above. In some cases, we may charge a fee to make these adjustments to data or agreements with specific customers, depending on the nature of the request.

## **SECURITY**

Fozeus protects user data using encryption and takes all possible steps within our means to protect user data. We use Secure Sockets Layered (SSL) encryption among other features, such as firewalls, virus detection, and others. The user has a possibility to activate 2FA authentication and use it as an additional security measure for authentication.

We have taken all steps within our means to protect user data. Total protection is never possible under any company, including Fozeus. Data submission is at your own risk. We are committed to protecting that data, and we will notify users should any malpractice or damages towards user data occur.

Users are responsible for their own data, including choosing a safe password or agreeing to submit data to third parties companies including Fozeus. Data submission is at users own risk and they are responsible for their own data. We work with affiliate organisations and partners, and they may receive your data overseas depending on our own operations.

## **RETENTION AND STORAGE OF DATA**

Fozeus creates and keeps information records regarding customer accounts, activities, and transactions. These records may be stored digitally or on paper, and in most cases, digital methods are used. These records are necessary to allow us to offer our services and handle user queries, as well as for the purposes of legal compliance. If you deactivate your account in Fozeus, we will mark your account in our database as "Deactivated", we will anonymise your personal information and company-related information, in which case it is no longer considered personal information and company-related information, but we will keep your account information in our database for at least five years. This is necessary to prevent fraud and prevent people who try to commit fraud from being able to avoid their detection by merely deactivating their account and opening another one.

We keep data for this period to comply with international and local laws and regulations around money laundering. We may keep data for over ten years in some cases for tax, bookkeeping and regulatory purposes.



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Fozeus will not attempt to collect sensitive data not necessary for our operations, and we will not process information belonging to children (under 13 or other age as required by local law)

("Children"). We do not knowingly collect personally identifiable information from Children. If you are a parent or guardian and you are aware that your Children has provided us with personal information, please contact us. If we become aware that we have collected personal information from a child under the age of 16 (or the applicable age in their territory) without verification of parental consent, we take steps to remove that information from our servers.

## **FRAUD, PHISHING AND EMAIL SCAMS**

Please be notified that Fozeus is not in any partnership with entities who represent themselves as customer support agents, providing customer support services via email and/or social media and promising to help solve your issues for money. If you discovered what you believe is a fraud, phishing, or scam which impersonates Fozeus, please contact us as soon as possible.

## **LINKS TO OTHER SITES**

Fozeus websites and applications may link to other sites and online third-party tools and resources. Our privacy policy does not apply to these third-party entities, but to our websites and applications only. Third-party sites and resources are not under our control, and we accept no liability for the use of these sites and resources including losses, technical failures, damages, or any other undesirable outcomes. Users are advised to familiarize themselves with the terms of use and privacy policies for third party sites and resources.

## **CHANGES AND QUERIES**

This Privacy Policy is subject to change at the sole discretion of Fozeus. We will notify users of any changes by posting the new Privacy Policy on this page. Users are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

To make an inquiry about any of the information listed within this privacy policy, please contact [hello@fozeus.me](mailto:hello@fozeus.me)