# **Privacy Policy**

This policy (our "Privacy Policy") explains how information about you is collected, used and disclosed by SFOX, Inc. along with its affiliated entities ("SFOX", "us," "our," or "we"). This Privacy Policy applies to information we collect when you use sfox.com or any associated websites, APIs, or mobile applications (collectively, the "SFOX Services"). We may change the Privacy Policy from time to time. If we make changes, we will notify you as required by law, and in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you an email notification). We encourage you to review the Privacy Policy whenever you access the SFOX Services to stay informed about our information practices and the ways you can help protect your privacy.

## 1. HOW WE COLLECT INFORMATION ABOUT YOU

- 1.1. Information You Provide to Us. We collect information you provide directly to us. Some examples include, but are not limited to collecting information when you create an account, when you provide payment information or transfer funds in and out of your SFOX account, when you participate in any interactive features of the SFOX Services, when you fill out a form, when you participate in a contest or promotion, when you make a purchase on the platform, when you apply for a job, when you communicate with us via third party social media sites, when you request customer support or when you otherwise communicate with us. The types of information we may collect include but are not limited to your name, email address, postal address, phone number, fax number, credit card information, bank information, identity information, social security number, date of birth, crypto currency address and any other information you choose to provide.
- 1.2. Information We Collect Automatically. When you access or use the SFOX Services, we automatically collect information about you, including but not limited to:
  - Log Information. We log information about your use of the SFOX Services, including the type of browser
    you use, access times, pages viewed, your IP address and the page you visited before navigating to the
    SFOX Services.
  - Device Information. We collect information about the computer or mobile device you use to access the SFOX Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.
  - Transaction Information. We collect information about your transactions with or through us, such as your account balance, trading activity, loan amount and account history, if applicable.
  - Location Information. We may collect information about the location of your device each time you access or use one of our mobile application(s) or otherwise consent to the collection of this information. For more details, please see "Your Choices" below.
  - Information Collected by Cookies and Other Tracking Technologies. We use various technologies to collect information, and this may include sending "cookies" to your computer or mobile device. Cookies are small data files stored on your hard drive or in device memory that help us to improve the SFOX

Services and your experience, see which areas and features of the SFOX Services are popular and count visits. We may also collect information using web beacons (also known as "tracking pixels"). Web beacons are electronic images that may be used in the SFOX Services or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. For more information about cookies, and how to disable them, please see "Your Choices" below.

**1.3. Information We Collect From Other Sources**. We may also obtain information from other sources and combine that with information we collect through the SFOX Services. For example, we may collect information about you from third parties, including but not limited to identity verification services, credit bureaus, mailing list providers, your credit union and publicly available sources.

## 2. HOW WE USE THE INFORMATION WE COLLECT

- 2.1. SFOX Use. We may use information about you for various reasons, including but not limited to:
  - Maintain, and improve the SFOX Services;
  - Provide and deliver the products and services you request, process transactions and send you related information, including confirmations and invoices;
  - Send you technical notices, updates, security alerts and support and administrative messages;
     Respond to your comments, questions and requests and provide customer service;
  - Communicate with you about products, services, offers, promotions, rewards, and events offered by SFOX and others, and provide news and information we think will be of interest to you;
  - Monitor and analyze trends, usage and activities in connection with the SFOX Services;
  - Personalize and improve the SFOX Services and provide advertisements, content or features that match user profiles or interests;
  - Process and deliver contest entries and rewards;
  - Link or combine with information we get from others to help understand your needs and provide you with better service; and
  - Carry out any other purpose for which the information was collected.
- **2.2. Sharing.** We may share information about you as follows or as otherwise described in this Privacy Policy:
  - With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;
  - In response to a request for information if we believe disclosure is in accordance with any applicable law, regulation or legal process, or as otherwise required by any applicable law, rule or regulation;
  - If we believe your actions are inconsistent with the spirit or language of our Terms of Service or policies, or to protect the rights, property and safety of SFOX or others;

- In connection with, or during negotiations of, any merger, sale of SFOX assets, financing or acquisition of all or a portion of our business to another company;
- With your consent or at your direction, including if we notify you through the SFOX Services that the information you provide will be shared in a particular manner and you provide such information; and
- We may also share aggregated or anonymized information, which cannot reasonably be used to identify
  you.
- **2.3.** Legal bases for processing (for EEA users). Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal data. We collect and process information about you only where we have legal basis for doing so under applicable laws. The legal basis depends on the SFOX Services you use and how you use them. This means we collect and use your information only where:
  - We need it to provide you the SFOX Services, including to operate the SFOX Services, provide customer support and personalized features and to protect the safety and security of the SFOX Services;
  - It satisfies a legitimate interest which is not overridden by your data protection interests, such as for research and development, to market and promote the SFOX Services and to protect our legal rights and interests;
  - You give us consent to do so for a specific purpose; or
  - We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, subject to any exemptions provided by law, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party have a legitimate interest to do so, you may have the right to object to that use though, in some cases, this may result in no longer being able to use the SFOX Services.

**2.4. Online Tracking.** SFOX may allow others to serve advertisements on our behalf across the Internet and to provide analytics services. These entities may use cookies, web beacons and other technologies to collect information about your use of the SFOX Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by SFOX and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests in the SFOX Services and other websites and better understand your online activity. SAFE uses the information collected by SFOX strictly to provide you the agreed services, and not for delivering advertising and/or marketing content. For more information about Internet-based ads, or to opt out of having your web browsing information used by certain companies for behavioral advertising purposes, pleasevisit http://www.networkadvertising.org and http://www.aboutads.info.

#### 3. SECURITY

SFOX takes commercially reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

#### 4. YOUR CHOICES

- **4.1. Account Information.** You may update or correct information about you at any time by logging into your account. You may contact <a href="mailto:support@sfox.com">support@sfox.com</a> for help. If you wish to deactivate your account, please email us at <a href="mailto:support@sfox.com">support@sfox.com</a>, but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.
- **4.2. Location Information.** When you first launch any of our mobile applications that collect location information, you will be asked to consent to the application's collection of this information. We currently require this location information in order to use the SFOX Services, so if you do not consent to this collection, you cannot use the SFOX Services. If you initially consent to our collection of location information, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. If you do so, our mobile applications, or certain features thereof, will no longer function. You may also stop our collection of location information by following the standard uninstall process to remove all of our mobile applications from your mobile device.
- **4.3.** Cookies. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies, but please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the SFOX Services.
- **4.4. Promotional Communications.** You may opt out of receiving promotional emails or text messages by following the instructions in those emails or text messages. If you opt out, we may still send you non-promotional communications, such as those about your account or our ongoing business relations.