

# MULTISENDER GENERAL PRIVACY POLICY & DISCLOSURES

**Last Updated: July 12, 2023**

## Introduction

As part of our daily business operations, we may collect personal information from our users and prospective users in order to provide them with our products and services and ensure that we can meet their needs when providing these products and services, as well as when providing them with any respective information. Our collection practices are quite limited and are limited to public blockchain wallet information and certain identifiers for communications with you. We only provide such information to service providers in connection with screening wallets for any history of unlawful activity.

Your privacy is of utmost importance to us, and it is our policy to safeguard and respect the confidentiality of information and the privacy of individuals. This Privacy Policy sets out how Shultzprime Solutions, Inc., and its successors, assigns, subsidiaries, and affiliates (collectively, the **"Company"**, **"we"**, **"us"**) collects, uses and manages the personal information that we receive from you, or a third party, in connection with your use of Site, and other services provided by us or the information which we collect from your use of Site. The Privacy Policy also informs you of your rights with respect to the processing of your personal information.

Our Privacy Policy is reviewed regularly to ensure that any new obligations and technologies, as well as any changes to our business operations and practices are taken into consideration, as well as that it remains abreast of the changing regulatory environment. We may amend this Privacy Policy at any time by posting the amended version on this site including the effective date of the amended version. We will announce any material changes (as we determine in our sole discretion) to this Privacy Policy on our website. Any personal information we hold will be governed by our most recent Privacy Policy. We encourage you to periodically review this page for the latest information on our privacy practices. All changes shall be effective from the date of publication unless otherwise provided. Please see the Company's Terms of Service, policies and guidelines for current limitations and services being provided.

Please note that if you are an employee of the Company, a contractor to the Company or a third-party provider, your personal information may be used in connection with your employment contract or your contractual relationship, whichever applies.

This Privacy Policy applies to the processing activities performed by Company to the personal information of its users and its potential users, including any Site app visitors. Please note, this Privacy Policy applies only to the extent required under applicable law to you. Notably, if you are not based in jurisdictions subject to the European General Data Protection Regulation (GDPR) and the UK GDPR, provisions relating to these laws do not apply to you.

- Our services may include links, or introductions, to third party services. The use of these third-party services may result in the collection and sharing of information about you by these third party services.

- This Privacy Policy does not address the data processing practices of any third party, unless as specified otherwise. Please note, the inclusion of a link on any of our services to a third party's service does not imply endorsement of the third party's data handling practices and does not imply that the third party's practices are covered by this Privacy Policy. We are not responsible for the privacy practices of these entities.
- We encourage you to be aware when you leave our services, and to read the privacy statements or notices of each website or app on which you land after you click on a link or social networking button.

## Definitions

As used herein, the following terms are defined as follows:

**"Site"** or **"our services"** refers to all the services and functionalities available on <https://multisender.app/> and any pages thereof, mobile app (if any) and any other software, tools, or features provided by the Company.

**"Personal information"** or **"personal data"** or **"your data"** refer to any information relating to you, as an identified or identifiable natural person, including your name, an identification number, location data, or an online identifier or to one or more factors specific to the physical, economic, cultural or social identity of you as a natural person.

**"User"**, **"users"** or **"you"** refer to anyone who accesses or uses Site and other services, websites, or apps provided by the Company.

**"We," "us,"** or **"Company"** refer to Shultzprime Solutions, Inc., and its successors, assigns, and affiliates.

## Your Data Controller

Data privacy laws sometimes differentiate between "controllers" and "processors" of personal information. A "controller" determines the purposes and means (i.e., the why and how) of processing personal information. A "processor", which is sometimes referred to as a "service provider," on the other hand, processes personal information on behalf of a controller and is subject to the latter's instructions and corresponding contractual restrictions.

The Company you are contracting with is your data controller or data policy manager, and is responsible for the collection, use, storage, disclosure, retention and protection of your personal information in accordance with our policies and procedures, this Privacy Policy, as well as any applicable national laws. The Company uses encryption to protect your information and store decryption keys in separate systems. We may process and retain your personal information on servers in multiple data center locations, including the European Union, Japan, Australia, the United Kingdom, the United States of America and elsewhere in the world. By using the Site, you agree that your personal information may be transferred to, stored, and handled as described in this Policy.

# How do we protect personal information?

The Company respects the privacy of users who access Site, and it is therefore committed to taking the reasonable steps to safeguard any existing or prospective users, applicants and app visitors that may be required by applicable law.

The Company seeks to keep any personal data of its users and its potential users in accordance with the applicable privacy and data protection laws and regulations.

While no website or application is absolutely secure, we believe we have the necessary and appropriate technical and organizational measures and procedures in place to seek to ensure that your information remains secure at all times. We regularly train and raise awareness for all our employees to the importance of maintaining, safeguarding and respecting your personal information and privacy. We regard breaches of individuals' privacy very seriously and will impose appropriate disciplinary measures, including dismissal from employment. Although we have not appointed an official Group Data Protection Officer, you may request to exercise your applicable access, rectification, cancellation, and/or objection rights at the contact set out below.

The personal information that you provide us with when creating a user account or through a similar engagement with the Site is classified as registered information, which is protected in several ways. You can access your registered information after logging in to the user account. It is your responsibility to make sure that the password to your user account (if any) is only known to you and not disclosed to anyone else. Registered information is securely stored in a safe location, and only authorized personnel have access to it. All personal information is transferred to the Company over a secure connection, and thus reasonable measures are taken to prevent unauthorized parties from viewing any such information. Personal information provided to the Company that does not classify as registered information is also kept in a safe environment and accessible by authorized personnel of Company.

## Information we may collect about you.

When you are opening a user account with us or using the Site, we may collect from you any of the following types of information:

- Identifiers, such as name, alias, online identifiers, account name, or description;
- Contact information, including, email address;
- Financial information, such as transaction information, payment information, and purchase history;
- Information on your accounts with third-party websites, platforms, apps, and services and information that you have provided when creating an account with, or using, the third-party websites, platforms, apps, and services;
- Publicly-available blockchain data. When you connect your non-custodial blockchain wallet to the platform, we collect and log your publicly-available blockchain address to learn more about your use of the Site and to screen your wallet for any prior illicit activity. We screen your wallet using intelligence provided by leading blockchain analytics

providers. 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.

- Information from other sources. We may receive information about your wallet address or transactions made through the Services from our service providers in order to comply with our legal obligations and prevent the use of our Services in connection with fraudulent or other illicit activities;
- Information from tracking technologies. We and our third-party services providers may access and collect information from mobile device ID, cookies, web beacons, and other similar technologies to provide and personalize the Services and features of the Services for you across sessions;
- Other personal information or commercial and/or identification information – whatever information we, in our sole discretion, deem necessary to comply with our legal obligations under various laws, such as under the European Union’s 4th AML Directive and the U.S. Bank Secrecy Act (BSA).

Information that we may collect about you automatically:

- Browser Information – Information that is automatically collected via analytics systems providers from your browser, including your IP address and/or domain name, any external page that referred you to us, your login information, Internet browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, your Media Access Control (MAC) address, computer type (Windows or Mac), and screen resolution;
- Log Information – Information that is generated by your use of Site that is automatically collected and stored in our server logs. This may include, but is not limited to, device-specific information, location information, system activity and any internal and external information related to pages that you visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website or app, including date and time; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. We may collect similar information, such as your device type and identifier, if you access the Site through a mobile device. We use this information to ensure that the Service functions properly.

We obtain information about you in a number of ways through your use of our services, including through any of our websites, the user account opening process or similar engagement with Site, webinar sign-up forms, event subscribing, news and updates subscribing, and from information provided in the course of on-going support service communications. We may also receive information about you from third parties such as your payment providers and through publicly available sources. For example:

- The banks, if any, you use to transfer money to us will provide us with your basic personal information, such as your name and address, as well as your financial information such as your bank account details;
- Your business partners, if any, may provide us with your name and address, as well as financial information; or
- Advertising networks, analytics providers and search information providers may provide us with anonymized or de-identified information about you, such as confirming how you found our website.

# How we use data and the lawful basis for processing your personal information.

Certain laws, including the European GDPR and UK GDPR, may require us to have a legal basis for processing Personal Data about you. Our bases for processing your data include (but are not limited to): (i) you have given consent to the process to us or our service provides for one or more specific purposes; (ii) processing is necessary for the performance of a contract with you; (iii) processing is necessary for compliance with a legal obligation; and/or (iv) processing is necessary for the purposes of the legitimate interested pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests. We will process your personal information on the following bases and for the following purposes:

## **Consent and Contract**

To the fullest extent permitted by applicable law, when you have given us clear consent to process your Personal Data for a specific purpose.

## **Providing the functionality of the Site and fulfilling your requests**

We process personal data in order to provide our services and products, as well as information regarding our products and services based on the relationship with our users (i.e., so as to perform our obligations), to provide users with related customer service, to respond to your inquiries and fulfill your requests, such as to send you documents you request or email alerts, to send you important information regarding our relationship with you or regarding the Site, changes to our terms, conditions, and policies and/or other administrative information. We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation. In addition, the processing of personal data takes place to enable the completion of our user on-boarding process, including when you register with us to receive services, at which time we may process various information such contact details, credit card information (when you make a purchase), professional information such as purchase and subscription information. We may rely on your consent, our legitimate interests, and/or the fulfillment of a contractual obligation as the lawful basis for processing your Personal Data.

We must verify your identity in order to open the user account and we will use your personal data in order to effectively manage your use of the Site with us. We may rely on legitimate interests and/or the fulfillment of a contractual obligation as the legal basis for processing your Personal Data. Our legitimate interests are to provide you with the Service that you or your company have requested appropriately.

## **Compliance with a legal obligation**

There are a number of legal obligations which may ultimately be imposed by relevant laws to which we are subject, as well as specific statutory requirements e.g., anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws. There are also various supervisory authorities whose laws and regulations may apply to us. Such obligations and requirements imposed on us necessary personal data processing activities for identity verification, wallet screening, payment processing when appropriate, compliance with court orders, tax laws or other reporting obligations and controls. These obligations apply at various times, including user on-boarding, payments and systemic checks for risk management.

Additionally, Personal Data may be processed when it is necessary to perform a contract we have with you, or when you have asked us to take specific steps before entering into a contract.

### **EU GDPR and UK GDPR Not Applicable**

The Company believes it is not subject to the European Union (EU) and United Kingdom (UK) General Data Protection Regulation (GDPR) because it is not established in the European Union or European Economic Area (EEA); the Company does not target goods or services to the EU or EEA and although it offers services globally (as Blockchains are global), the Company does not accept payment in Euros or pounds and deals in Digital Assets only (non fiat); the Company does not build profiles on digital wallet addresses or IP addresses; and the Company only uses digital wallet addresses and IP addresses temporarily for the purpose of a wide-spread distribution/delivery airdrop. For the aforementioned reasons, the Company believes that the EU GDPR and UK GDPR does not apply to the Company's processing of personal data.

### **For the purpose of safeguarding legitimate interests**

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. Example of such processing activities include (but are not limited to) the following:

- Initiating legal claims and preparing our defense in litigation procedures;
- Undertaking means and processes to provide for the Company's IT and system security, preventing potential crime, asset security and access controls;
- Performing audits, to verify that our internal processes function as intended and we are compliant with legal, regulatory, or contractual requirements;
- Developing and adopting measures for managing the business and for further developing products and services;
- Potentially, in the future, sharing your data within the Shultzprime Solutions group of companies (e.g., affiliates) for the purpose of updating and/or verifying your personal data in accordance with the relevant anti-money laundering compliance frameworks (if applicable); and
- Risk management.

### **To provide you with products and services, or information about our products and services, and to review your ongoing needs.**

We must use your personal information to perform our services and comply with our obligations to you. It is also in our legitimate interests to try to ensure that we are providing the best products and services so we may periodically review your needs based on our assessment of your personal information to ensure that you are getting the benefit of the best possible products and services from us.

### **To help us improve our products and services, including support services, and develop and market new products and services.**

We may, from time-to-time, use personal information provided by you through your use of our

services and/or through user surveys to help us improve our products and services. It is in our legitimate interests to use your personal information in this way to try to ensure the highest standards when providing you with our products and services and to continue to be a market leader within our industry.

**To investigate or settle enquiries or disputes.**

We may need to use personal information collected from you to investigate issues or to settle disputes with you because it is our legitimate interest to ensure that issues and disputes get investigated and resolved in a timely and efficient manner.

**To comply with applicable laws, subpoenas, court orders, other judicial process, or the requirements of any applicable regulatory authorities.**

We may need to use your personal information to comply with any applicable laws and regulations, subpoenas, court orders or other judicial processes, or requirements of any applicable regulatory authority (including Know Your Customer, compliance, security and identity checks). We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

**To send you surveys.**

From time to time, we may send you surveys as part of our user feedback process. It is in our legitimate interest to ask for such feedback to try to ensure that we provide our products and services at the highest standard. However, we may from time to time also ask you to participate in other surveys and if you agree to participate in such surveys, we rely on your consent to use the personal information we collect as part of such surveys. All responses to any survey we send out whether for user feedback or otherwise will be aggregated and depersonalized before the results are published and shared.

**Data analysis**

Our website pages and emails may contain web beacons or pixel tags or any other similar types of data analysis tools that allow us to track receipt of correspondence and count the number of users that have visited our webpage or opened our correspondence. We may aggregate your personal information with the personal information of our other users on an anonymous basis (that is, with your personal identifiers removed), so that more rigorous statistical analysis of general patterns may lead us to providing better products and services.

If your personal information is completely anonymized, we do not require a legal basis as the information will no longer constitute personal information. If your personal information is not in an anonymized form, we rely on your consent when such data is collected via non-essential cookies if required by law, and also because it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

**Internal business purposes and record keeping**

We may need to process your personal information for internal business and research purposes as well as for record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the products and services we provide to you and our relationship with

you. We will also keep records to ensure that you comply with your contractual obligations pursuant to the Terms of Service governing our relationship with you and other Site policies, guidelines, and procedures.

## **Notifications**

Often the law requires us to advise you of certain changes to products or services or laws. We may need to inform you of changes to the Terms of Service, other any other Site policies, guidelines, and procedures. or the features of our products or services. We need to process your personal information to send you these notifications. You will continue to receive this information from us even if you choose not to receive direct marketing information from us.

# **How we Disclose your personal information**

The Company will not disclose any of its users' personal information to a third party, except: (a) to the extent that it is required to do so pursuant to any applicable laws, rules or regulations; (b) if there is a duty to disclose; (c) if our legitimate business interests require disclosure; (d) in line with our Terms of Service; (e) safety and security, (f) business changes (such as merger, acquisition, bankruptcy, dissolution, reorganization, asset or stock sale, or other business transaction), (g) with service providers to assist in provider, delivering or improving the services, or (h) at your request or with your consent or to those described in this Privacy Policy. The Company will endeavor to make such disclosures on a "need-to-know" basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company will notify the third party regarding the confidential nature of any such information.

As part of using your personal information for the purposes set out above, the Company may generally disclose your personal information to the following:

- Any members, employees, officers, directors, managers, and shareholders of the Company, our affiliates and subsidiaries;
- Any of our service providers and business partners, for business purposes, such as specialist advisors who have been contracted to provide us with administrative, financial, legal, tax, compliance, insurance, IT, debt-recovery, analytics, research or other services;
- Any third parties connected with the sale, merger, bankruptcy, sale of assets, or reorganization of the Company;
- Any enforcement and government agencies, as required under the applicable law; and
- Third-party services to which you've connected your Site account.

In furtherance of the above, we may also share your personal data as follows:

**Third Parties:** If the Company discloses your personal information to service providers and business partners, in order to perform the services requested by users, such providers and partners may store your personal information within their own systems in order to comply with their legal and other obligations. We will make reasonable efforts to let you know when a third party is involved, in which case we may share your Personal Data with that third party. We may share personal data with, or direct customers to provide such information, to payment processors who process payment



for services on our behalf.

We make efforts to require that service providers and business partners who process personal information acknowledge the confidentiality of this information, undertake to respect any user's right to privacy and comply with all relevant privacy and data protection laws and this Privacy Policy.

**Marketing Communications:** Where we have your consent to do so or where otherwise permitted by law, we may send you information about the Services, including features you may be interested in, for example, by postal mail, email or telephone. Some of these communications may include marketing materials. If you would like to opt out of getting marketing communications from us please contact us at [team@multisender.app](mailto:team@multisender.app) or follow the available opt-out or unsubscribe instructions included in each communication. Please note that we may still continue to send you transactional and other non-marketing communications, for example, messages about products or services you or your organization have requested, events you've registered for, announcements about service levels or security-related issues, etc., even after you've opted out.

**Marketing Partners:** In some instances, we may share personal data with our marketing partners, if any, including ad networks, social networks, retargeting partners, and marketing communication providers, in order to communicate with you about our products and services and market our products and services to you. See our Cookies section for more information.

**Business Transactions:** The Company may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may assign or transfer this Privacy Policy and your personal data to a third party in connection with such a corporate business transaction, for example, during negotiations or as an asset. Personal Data may also be disclosed in the event of insolvency, bankruptcy, or receivership.

**Legal Obligations and Rights:** In addition to the purposes described above, we disclose personal data to third parties, such as legal advisors and law enforcement, to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such personal data if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our agreement for services, or as otherwise required by law.

**Transfers Directed or Permitted by You:** We may disclose personal data about you to certain other third parties at your direction or with your consent or permission.

**Cookies:** To enable our systems to recognize your browser or device and to provide and improve our Services, we use cookies and similar technologies. For more information about how we use them, how you can control them, and your choices regarding interest-based advertising and targeted advertising please see our Cookies section.

**Non-Identifiable:** In addition, where allowed by applicable law, we may use and disclose information that is not in personally identifiable form for any purpose. If we combine information that is not in personally identifiable form with information that is identifiable (such as combining your name with your geographical location), we will treat the combined information as personal information as long as it is combined.

If required by applicable law, we will seek your consent or opt-in to such sharing, for instance, via the registration form or another affirmative action by you. In these circumstances, your information will be subject to the relevant partner's privacy statements. If you do not wish for your information to be shared in this manner, you may choose to not register for the event or otherwise participate, or not access the material, as the case may be. Alternatively, you can opt out in accordance with the choices provided to you in this Privacy Policy.

# Where we store your personal data

Our operations are supported by a network of computers, servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers and business partners store and may process your personal data in the European Union, Japan, the United Kingdom, the United States of America and elsewhere in the world.

## Transfers of personal information outside of the European Economic Area (EEA) and the United Kingdom (UK)

Your personal information may be stored and processed in any country where we have facilities or service providers, and by using our Site or by providing consent to us (where required by law), your information may be transferred to countries outside of your country of residence, including to the United States, which may provide for different data protection rules than in your country. We may transfer your personal information outside the EEA and UK to other Company subsidiaries, service providers and business partners (i.e., Data Processors) who are engaged on our behalf. To the extent that we transfer your personal information outside of the EEA and UK, we will use reasonable efforts to ensure that the transfer is lawful and that Data Processors in third countries are obliged to comply with the European Union (EU) General Data Protection Act 2016 and the UK Data Protection Act 2018. If transfers of personal information are processed in the US, we may in some cases rely on standard contractual clauses.

## Transfers of personal information outside of your country

By using our products and services, you consent to your personal data being transferred to other countries, including countries that have differing levels of privacy and data protection laws than your country. In all such transfers, we will use reasonable organizational, technical, and administrative measures to protect your personal information as described in this Privacy Policy and ensure that appropriate information sharing contractual agreements are in place.

## Privacy when using blockchains

Your transactions and some other activities on Site relating to Digital Assets may be recorded on a public blockchain. Please note, to be clear, the Company is entitled to limit payments for any products or services to any one or more Digital Assets and/or to fiat. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

Because blockchains are decentralized networks which are not controlled or operated by Company or its affiliates, we are not able to erase, modify, or alter personal data from such networks.

As used above, “Digital Asset” means a digital representation of value (also referred to as “cryptocurrency,” “virtual currency,” “digital currency,” “crypto token,” “crypto asset,” or “digital commodity”), such as bitcoin or ether, which is based on the cryptographic protocol of a computer network that may be (i) centralized or decentralized, (ii) closed or open-source, and (iii) used as a medium of exchange and/or store of value. For the avoidance of doubt, the term “Digital Asset” includes non-fungible tokens (NFTs).

## Data Retention

Safeguarding the privacy of your personal information is of utmost importance to us, whether you interact with us personally, by phone, by email, over the internet or any other electronic medium. We will hold personal information, for as long as we have a business relationship with you, in secure computer storage facilities, and we take the reasonable measures to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

We will retain Personal Data we process on behalf of our customers or users for as long as needed to provide the Service to our customers, subject to our compliance with this Privacy Policy and any relevant customer agreements. When we consider that personal information is no longer necessary for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time (after you cease being our user). For example, we may be subject to certain laws that require us to retain certain information for a period of 5 years after our business relationship with you has ended.

We may keep your data for longer than 5 years if we cannot delete it for legal, regulatory, or technical reasons. We may further retain and use this Personal Data as necessary, including by not limited to:

- complying with our legal obligations (including in defense or pursuit of a legal claim),
- maintaining accurate accounting, financial, and other operational records,
- resolving disputes, and
- enforcing our agreements.

Also, the personal information we hold in the form of a recorded information, by telephone, electronically or otherwise, will be held in line with local regulatory requirements (i.e., 5 years after our business relationship with you has ended or longer if you have legitimate interests (such as handling a dispute with you). If you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

## Cookies

When you use our products and services, we may make use of the standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, “**Cookies**”) on

your computer or other devices used when engaging with us. We use Cookies to help us recognize you as a customer, collect information about your use of our products and services, to better customize our services and content for you, and to collect information about your computer or other access devices to ensure our compliance with our legal obligations. We may receive reports based on the use of Cookies from third-party service providers on an individual as well as aggregated basis.

## **Your rights regarding your personal information**

To the extent granted by applicable law, you may have certain rights to control or seek information about the Company's processing of your personal data. Depending on your jurisdiction, and subject to its relevant exemptions and exceptions, these rights may include, among others, the right to:

### **Information Access**

If you ask us, we will confirm whether we are processing your personal information and, if so, what information we process and, if requested, provide you with a copy of that information within 30 days from the date of your request.

### **Rectification**

It is important to us that your personal information is up to date. We will take all reasonable steps to make sure that your personal information remains accurate, complete and up-to-date. If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have disclosed your personal information to others, we will let them know about the rectification where possible. If you ask us, if possible and lawful to do so, we will also inform you with whom we have shared your personal information so that you can contact them directly.

You may inform us at any time that your personal details have changed by emailing us at the email address indicated below. The Company will change your personal information in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof, i.e., personal information that we are required to keep for regulatory or other legal purposes. Please note that, to the extent any of your personal information is memorialized on the public blockchain, we may not be able to rectify it.

### **Erasure**

You can ask us to delete or remove your personal information in certain circumstances such as if we no longer need it, provided that we have no legal obligation to retain that data. Such requests will be subject to the contract that you have with us, and to any retention limits we are required to comply with in accordance with applicable laws and regulations. If we have disclosed your personal information to others, we will let them know about the erasure request where possible. If you ask us, if possible and lawful to do so, we will also inform you with whom we have shared your personal information so that you can contact them directly. Erasure is subject to the limitations set forth in the Terms of Service and any other Site policies, guidelines, and procedures. Please note that, to the extent any of your personal information is memorialized on the public blockchain, we may not be able to delete or remove it.

### **Processing restrictions**

You can ask us to block or suppress the processing of your personal information in certain circumstances such as if you contest the accuracy of that personal information or object to us

processing it. It will not stop us from storing your personal information. We will inform you before we decide not to agree with any requested restriction. If we have disclosed your personal information to others, we will let them know about the restriction of processing if possible. If you ask us, if possible and lawful to do so, we will also inform with whom we have shared your personal information so that you can contact them directly.

### **Data portability**

In certain circumstances you might have the right, to obtain personal information you have provided us with (in a structured, commonly used and machine-readable format) and to re-use it elsewhere or ask us to transfer this to a third party of your choice.

### **Objection**

Please see limitations and procedures set forth in the Terms of Service and any other Site policies, guidelines, and procedures published on the Site. Please be aware that information cannot be deleted from the public blockchain. Otherwise, you can ask us to stop processing your personal information, and we will do so, if we are:

- Relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
- Processing your personal information for direct marketing;
- If you are Appealing our decisions to your local regulator; or
- Processing your personal information for research unless we reasonably believe such processing is necessary or prudent for the performance of a task carried out in the public interest (such as by a regulatory or enforcement agency).

### **Automated decision-making and profiling**

If we have made a decision about you based solely on an automated process (e.g., through automatic profiling) that affects your ability to access Site and our products and services or has another significant effect on you, you can request not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us or for the compliance with applicable law. Even if a decision is necessary for entering into or performing a contract, you may contest the decision and require human intervention. We may not be able to offer our products or services to you in such a case.

## **Changes to this Privacy Policy**

Our Privacy Policy is reviewed regularly to ensure that any new obligations and technologies, as well as any changes to our business operations and practices are taken into consideration, as well as that it remains abreast of the changing regulatory environment. Any personal information we hold will be governed by our most recent Privacy Policy.

If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and other places we deem appropriate.

# Our products and services are not directed at children

Except to the extent permitted by the Terms of Service, our products and services are not directed to persons under the age of majority in such person's jurisdiction (e.g., 18 years old in the United States), hereinafter "**Children**", "**Child**" and we do not knowingly collect personal information from Children. If we learn that we have inadvertently gathered personal information from a Child, we will take legally permissible measures to remove that information from our records. The Company will require the user to delete his or her account and will not allow the use of our products and services. If you are a parent or guardian of a Child, and you become aware that a Child has provided personal information to us, please contact us at the email address indicated below. You may request to exercise your applicable access, rectification, cancellation, and/or objection rights by contacting us at [team@multisender.app](mailto:team@multisender.app).

## Accessibility

If you have a problem reading or accessing information or materials on Site, please inform us at [team@multisender.app](mailto:team@multisender.app).

## Choices and Access

We give you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt out from:

**Receiving marketing communications from us:** If you no longer want to receive marketing communications from us on a going forward basis, you may opt out of receiving them by contacting us at the email address indicated in the section "Contact Information" below. In your request to us, please provide your name, identify the form(s) of marketing communications that you no longer wish to receive, and include the address(es) to which it/they are sent. For example, if you no longer wish to receive marketing emails or direct mail from us, tell us that, and provide your name and email or postal address.

**Receiving reminders from us:** If you no longer want to receive reminders from us on a going-forward basis, you may opt out of receiving them by contacting us at the email address indicated in the section "Contact Information" below. In your request to us, please provide your name and the email address or phone number at which you receive reminders from us.

**Our sharing of your personal information with affiliates and third-party partners:** If you previously opted in to receiving marketing communications from our affiliates or third-party partners, you may opt out of our sharing of your personal information with those parties for their direct marketing purposes on a going-forward basis by contacting us at the email address indicated in the section "Contact Information" below. In your request to us, please state that we should no longer share your personal information with our affiliates and/or third party partners for their marketing purposes, and include your name and email address.

We will seek to comply with your request(s) as soon as reasonably practicable. Please note

that if you opt out as described above, we will not be able to remove your personal information from the databases of our affiliates with which we have already shared your information (i.e., as of the date that we implement your optout request). Please also note that if you opt out of receiving marketing-related messages from us, we may still send you important transactional and administrative messages, from which you cannot opt out.

If you would like to review, correct, update, restrict, or delete your personal information, or if you would like to request to receive an electronic copy of your personal information for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), please contact us the email address indicated in the section “Contact Information” below. We will respond to your request as soon as reasonably practicable and no later than one month after receipt. If circumstances cause any delay in our response, you will be promptly notified and provided a date for our response.

## Contact Information

Any questions, complaints, comments and requests regarding this Privacy Policy are welcome and should be addressed to [team@multisender.app](mailto:team@multisender.app).

## Data Protection Authorities

If you are not satisfied with our response to your complaint, you have the right to submit a complaint to the regulator in your country. Here are the contact details of some of the regulators:

### **For residents of Australia:**

Office of the Australian Information  
Commissioner  
GPO Box 5288  
Sydney NSW 2001

### **For residents of Canada:**

Contact: <https://www.priv.gc.ca/en/report-a-concern/file-a-formal-privacy-complaint/>

### **For residents of the United Kingdom:**

The Information Commissioner's Office  
Wycliffe House, Water Ln  
Wilmslow SK9 5AF, UK  
Contact: <https://ico.org.uk/global/contact-us/>

### **If you are an EEA (European Economic Area) citizen:**

This will be the supervisory authority in the member state where you work, normally live, or where the alleged infringement of data protection laws has occurred.

Contact: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en) (Link for contact information for EU national data protection authorities)

**For residents of Japan:**

Personal Information Protection Commission  
Kasumigaseki Common Gate West Tower 32nd  
Floor, 3-2-1, Kasumigaseki, Chiyoda-ku,  
Tokyo, 100-0013, Japan

**For residents of Singapore:**

Personal Data Protection  
Commission 10 Pasir Panjang  
Road,  
#03-01 Mapletree Business City Singapore 117438