

## **Polarity Privacy Policy**

**Last Updated:** May 25, 2024

This is the privacy policy (“Privacy Policy”) for any application or service owned or operated (collectively the “Platform”) provided by POLARITY LN, INC. (“our”, “we”, “us”, or “Polarity”). Polarity is the controller of your personal information collected through the Platform.

### **1. Introduction**

This Privacy Policy explains who we are, why and how we process personal information collected through your use of the Platform and, if you are the subject of any of the personal information concerned, what rights you have and how to get in touch with us if you need to.

When you supply any personal information to us we may have legal obligations towards you in the way we use that personal information. For ease of reading, we have divided this Privacy Policy into several sections:

1. Introduction
2. What personal information we collect
3. How we share your personal information
4. How we use your personal information
5. Lawful bases for processing your personal information
6. Links to third-party sites
7. How long we keep your personal information
8. Security
9. International transfers of personal information
10. Your privacy choices
11. Your privacy rights
12. Contact details

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice that we may provide at or around the time that we collect or process personal information about you so that you are fully aware of how and why we are using that personal information.

This Privacy Policy supplements other notices and legal documents including the Terms of Service (“Terms”) and is not intended to override or replace them.

If, for any reason, you do not agree to the terms of this Privacy Policy, please stop using the Platform.

We reserve the right to revise or amend this Privacy Policy at any time to reflect changes to our business or changes in the law. Where these changes are material we will notify you as required by applicable law which may include us emailing you about such changes. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our services after the new Privacy Policy takes effect.

Please note that the Platform is not intended for use by nor directed at anyone under the age of 18 and we do not knowingly collect data relating to children. If you believe we have collected personal information about your child, you may contact us at [contact@flashnet.xyz](mailto:contact@flashnet.xyz) and request that we remove information about them.

## **2. What personal information we collect**

When you use the Platform to register an account, fill in forms provided on the Platform, subscribe to our services or report a problem with the Platform or otherwise communicate with us, we may collect, store and use certain personal information that you disclose to us. The information we collect from you may include (but is not limited to): email address, wallet address, feedback and log-in information.

We may collect certain personal information about you automatically when you visit and interact with the Platform. The following are examples of personal information we may collect automatically:

- information about your device, browser or operating system;
- time zone setting;
- information about interactions you have with the Platform (such as scrolling and clicks);
- information about the way you use and the actions you take within the Platform;
- length of time on the Platform and time spent within certain sections;
- response times; and

In addition, we, as well as third parties that provide content, advertising, or other functionality on the Platform, may use cookies, pixel tags, and other technologies (“Technologies”) to automatically collect information through your use of the Platform.

- **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
- **Pixel tags/Web beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Platform that collects information about engagement on our Platform. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page

or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Please refer to your device's help material to learn what controls you can use to remove cookies, block cookies, or disable certain device tracking. If you do this, it may affect your use of our website or mobile application.

See the section titled "Your Privacy Choices" below for additional information related to your choices regarding these Technologies.

### **3. How we share your personal information**

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

#### **Lawful basis for processing your information**

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- Where you have asked us to do so, or consented to us doing so;
- Where we need to do so in order to perform a contract we have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

#### **Service Providers**

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal data they need to fulfil the services we request, and we stipulate that they protect this information and do not use it for any other purpose. We take these relationships seriously and oblige all of our data processors to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights as a data subject.

#### **Other Disclosures**

During your use of the Platform, your app store provider and mobile network operator may also collect personal information about you regarding your use of the Platform such as your identity, your usage and location.

These third parties shall act as separate and independent controllers of that personal data and shall process it in accordance with their own privacy policy.

#### 4. How we use your information

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

- **Providing you with the Platform.** We use your personal information to fulfil our contract with you and provide you with the Platform, such as:
  - Managing your information and accounts;
  - Providing access to certain areas, functionalities, and features of the Platform;
  - Answering requests for customer or technical support;
  - Communicating with you about your account, activities on the Platform, and policy changes; and
  - Processing applications if you apply for a job we post on the Platform.
- **Administrative purposes.** We use your personal information for various administrative purposes, such as:
  - Pursuing our legitimate interests such as direct 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 Platform; o Improving, upgrading, or enhancing our Platform;  
Developing new products and services;
  - Ensuring internal quality control and safety;
  - Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
  - Debugging to identify and repair errors with our Platform;
  - Auditing relating to interactions, transactions, and other compliance activities;
  - Sharing personal information with third parties as needed to provide the Platform; o Enforcing our agreements and policies; and
  - Carrying out activities that are required to comply with our legal obligations.

- **Marketing to you.** We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.
- **With your consent.** We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.
- **De-identified and/or aggregated information.** We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about how you use the Platform, information about the device from which you access our Platform, 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.
- **Other purposes.** We also use your personal information for other purposes as requested by you or as permitted by applicable law.

## **5. Lawful bases for processing your information**

We will only use your personal information when the law allows us to. Most commonly we will use your personal information in the following circumstances:

- Where you have asked us to do so, or consented to us doing so;
- Where we need to do so in order to perform a contract we have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

## **6. Links to third party sites**

The Platform may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. We may also provide links to third party websites that are not affiliated with the Platform. Third party websites are out of our control and are not covered by this Privacy Policy. If you access third party sites using the links provided, the operators of these sites may collect information from you that could be used by them, in accordance with their own privacy policies. Please check these policies before you submit any personal information to those websites.

## **7. How long we keep your information**

We store the personal information we collect as described in this Privacy Policy for as long as you use the Platform, or as necessary to fulfill the purpose(s) for which it was collected, provide our Platform, resolve disputes, establish legal defenses, conduct audits, pursue legitimate

business purposes, enforce our agreements, and comply with applicable laws.

## **8. Security**

Where we have given you a password that enables you to access certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## **9. Your privacy choices**

The privacy choices you may have about your personal information are determined by applicable law and are described below.

- Email communications. If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or services you have requested. We may also send you certain non-promotional
- communications regarding us and our Platform, and you will not be able to opt out of those communications (e.g., communications regarding our Platform or updates to our Terms or this Privacy Policy).
- Text messages. If you receive an unwanted text message from us, you may opt out of receiving future text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us as set forth in “Contact Details” section below.
- “Do Not Track.” Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- Cookies and personalized advertising. 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 Platform may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for Android, iOS, and others.
- The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the Network Advertising Initiative, the Digital Advertising Alliance, the European Digital Advertising Alliance, and the Digital Advertising Alliance of Canada.

## 10. Your privacy rights

In accordance with applicable law, you may have a number of rights in relation to your personal information. Below, we have described the various rights that you may have as well as how you can exercise them.

- **Right of access.** You may have the right to request a copy of the personal information that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal information lawfully.
- **Right to correct.** You may, have the right to request we correct personal information that we hold about you which you believe is incorrect or inaccurate. Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with this right.
- **Right to delete.** You may have the right to request we erase personal information that we control if you do not believe that we need to continue retaining it (you may have heard of this right described as the “right to be forgotten”). Although we will do everything to respect such requests, it may not always be possible to erase all of your personal information as there may be legal requirements to keep certain personal information or technical limitations to the data we can delete; for example, we are not able to satisfy requests to erase records and information recorded on the blockchain, including, but not limited to, your chosen user name, your transaction history and your account balance. There may also be legitimate interests in keeping certain data including, amongst others, if the data is required for the Platform to function. If this is the case we will continue to process this personal information.
- **Right to restrict processing.** You may have the right to request that we restrict our processing of your personal information;
- **Right to portability.** Where you wish to transfer certain personal information that we hold about you, which is processed by automated means, to a third party you may have the right to request us to provide such personal information to you in a commonly used machine- readable format. Because of the kind of work that we do and the systems that we use, we do not envisage this right being particularly relevant to the majority of individuals with whom we interact. However, if you wish to transfer your data from us to a third party we are happy to consider such requests.
- **Right to object to processing.** You may have the right to object to processing of your personal information where we rely on legitimate interest for processing that personal data.
- **Right to object to automated decision making and profiling.** You may have the right to be informed about the existence of any automated decision making and profiling of your personal information, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you.

- **Withdrawal of consent.** Where we are relying on consent to process your personal information you may withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. Exercising your rights. When you write to us making a request to exercise your rights we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

We will process any requests we receive in accordance with applicable laws.

## **11. International transfers of personal information**

All personal information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your personal information consistent with the requirements of applicable laws.

If we transfer personal information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the EU Standard Contractual Clauses.

For more information about the safeguards we use for international transfers of your personal information, please contact us as set forth below.

## **12. Contact details**

If you have any queries regarding this Privacy Policy, if you wish to exercise any of your rights set out above or if you think that the Privacy Policy has not been followed, please contact us by emailing at [contact@flashnet.xyz](mailto:contact@flashnet.xyz)