

INTRODUCTION

1. IMPORTANT INFORMATION AND WHO WE ARE

Privacy policy

This privacy policy gives you information about how Tread Safely Inc. ("**Safely**") collects and uses your personal data through your use of this platform, including any data you may provide when you register with us or purchase a product or service.

This platform is not intended for children and we do not knowingly collect data relating to children.

Controller

When we mention "Company", "we", "us" or "our" in this privacy policy, we are referring to Tread Safely Inc. We will let you know which entity will be the controller for your data when you purchase a product or service with us.

Tread Safely Inc., a company incorporated in Delaware having file number 10631521 whose registered office is at 8 The Green # 21969, Dover, DE 19901, USA, is the controller and responsible for this platform.

If you have any questions about this privacy policy, including any requests to exercise your legal rights (clause 8), please contact our data protection officer (DPO) using the information set out in the contact details section (clause 9).

2. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

General

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

End Users Data

- **Financial Data** includes blockchain wallet and other payment details publicly available on blockchain.
- **Transaction Data** includes details of products and services you have purchased from us (if any).
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this platform.

- **Usage Data** includes information about how you interact with and use our platform, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- We also collect, use and share **aggregated data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific platform feature in order to analyse general trends in how users are interacting with our platform to help improve the platform and our service offering.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our platform;
 - subscribe to our services;
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our platform, we will automatically collect Technical Data about your equipment, browsing actions and patterns.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources.

4. HOW WE USE YOUR PERSONAL DATA

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your

personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To provide services which will include: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Financial (b) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include in particular: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Profile (b) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To administer and protect our business and this platform (including troubleshooting, data analysis, testing, system maintenance,	Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a

support, reporting and hosting of data)		business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant platform content	(a) Profile (b) Usage (c) Marketing and Communications (d) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our platform, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our platform updated and relevant, to develop our business and to inform our marketing strategy)

About Cookies

A cookie is a small file that is sent by a web server to a web browser and which is then stored by the browser. The cookie contains an identifier which is stored in your browser and then sent back to our server each time your browser accesses our platform.

Usually, cookies do not hold any data by which you can be identified, although if a service provider or we hold personal data about you (for example, because you have subscribed to a service that such provider or we offer) the cookie may be linked to that data.

The cookies can be used for authentication purposes, to identify users who are using a service, personalising the web browsing experience, security, analysis, or as appropriate.

We can use cookies for authentication purposes, to identify users who are using a membership service, personalizing the web browsing experience, security, advertising, analysis, or as appropriate.

In addition to cookies used by us, our platform may include links to third-party platform, plug-ins and applications which may use cookies, and those cookies may be also stored in your browser when you visit our platform.

If you wish to do so then, usually, you can prevent cookies from being downloaded to your browser and can delete those that have already been downloaded. How this may be achieved varies between different browsers. Consult the platform of your browser provider for more details.

5. HOWEVER, YOU SHOULD BE AWARE THAT IF YOU BLOCK OR DELETE COOKIES THIS MAY HAVE A DETRIMENTAL IMPACT UPON YOUR ABILITY TO ACCESS OUR PLATFORM OR THE THIRD-PARTY PLATFORM, AND THE PROVIDED SERVICES. IT MAY MEAN THAT NOT ALL OF THE FACILITIES OR SERVICES WILL BE ACCESSIBLE BY YOU, OR IT MAY MEAN THAT YOU ARE UNABLE TO ACCESS ANY PROVIDED MEMBER SERVICES. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data where necessary with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

- Internal Third Parties – Entities within the Group
- External Third Parties – Accountants, IT Professionals and Legal Counsels.
- Governmental bodies and regulatory authorities, judicial bodies, investigation bodies, based on written requests binding upon Safely.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law, and only process your personal data for specified purposes.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see clause 8 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). 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.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us by email or telephone, details of which are set out at clause 9 below.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. CONTACT DETAILS

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: support@safely.app

10. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on 1 June 2026.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

11. THIRD-PARTY LINKS

This platform may include links to third-party platform, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party platforms and are not responsible for their privacy statements. When you leave our platform, we encourage you to read the privacy policy of every platform you visit.