

# **DEFEXA WALLET**

## **PRIVACY POLICY**

### **INTRODUCTION**

This Privacy Policy was created by FPS Global LTD, a company incorporated in British Columbia, Canada under the registration number BC1283189 and owning this Defexa App that you have downloaded on your device.

At FPS Global LTD (“Company”, “we”, “our”), we care about our Users (“Users”, “you”, “your”) privacy and want you to feel confident and secure when using our non-custodial crypto wallet application (“Defexa App”, “Defexa Wallet”). We do understand that your personal information is valuable, and we are committed to collecting and protecting it in accordance with the applicable law and regulations. Our Privacy Policy explains in plain language how we collect, use, share, and protect your personal information when you use our Defexa App.

### **OVERVIEW**

While using Defexa App, you agree to the terms outlined in this Privacy Policy that is an integral part of the Terms of Use. By accepting the terms of this privacy Policy, you are also consenting to our collection, use, share, and retention of your information as described below. We kindly ask that you also review our Terms of Use, as they contain provisions that limit our liability and require you to resolve any disputes with us individually. If you do not agree with any part of this Privacy Policy, please refrain from using our services as described in the Terms of Use (“Services”) via Defexa App.

As the Defexa Wallet is a non-custodial crypto wallet software, we do not create accounts for our Users. You create your own wallet setting a seed-phrase and keeping it secure by yourself to have an access to the Defexa App and your assets. We do not require you to provide your Personal Data to us to use the Defexa Wallet. If you sign up for our newsletter or provide any personal data to participate in our special User programs that information will be collected by us.

Notwithstanding above mentioned, our third-party API providers may require you to provide them with Personal Data, in order to use their Services via Defexa App.

## **HOW DO I AGREE WITH THE PRIVACY POLICY?**

To accept this Privacy Policy, simply start using Defexa Wallet, which includes downloading Defexa App on App Store or Google Play, opening it on your smartphone and use one of its functions.

## **WHAT INFORMATION WE COLLECT?**

At Defexa Wallet we are trying to minimize the scope of Personal Data we collect. We may collect limited personal data from various sources and for the purposes described below:

### **Information you provide us with:**

When you contact us, sign up for our newsletter, sign up for advanced customer service, or participate in certain beta programs and services, we may collect personal data such as your name, email address, and country of residence. If you apply for a job with us, we may collect personal data you provide through our Defexa App or our Website – defexa.io (“Website”) or via a third-party website in connection with your job application.

### **Information gathered automatically**

We may automatically collect information about you and your devices when you use Defexa App. The Internet protocol (IP) address used to connect your mobile device to the Internet. Defexa Wallet services metrics (e.g., the occurrences of technical errors, your interactions with service features and content and your setting preferences). Records of any agreements between yourself and Defexa Wallet. For example, we may collect your internet protocol (IP) address, web browser type and web browser language, operating system type, the website you visited before browsing to our Website, the

pages you view, the length of time you spend on a page, the hyperlinks you click on, and other information about your use of the Defexa app. When performing an exchange through third-party API providers, information such as the wallet addresses and transaction IDs involved may be logged.

### **Information from third parties**

We may collect information about you from publicly available databases, such as the United Nations Sanctions List, US ITA Consolidated Screening List, and the SEC EDGAR. This information may include your name, address, email address, phone number, gender, national ID number, nationality/country of residence, date of birth, job role, public employment profile, listing on any sanctions lists maintained by public authorities, and any other necessary data.

We reserve the right to analyze public blockchain data, which may include timestamps of transactions or events, transaction IDs, digital signatures, transaction amounts, and wallet addresses.

From time to time, we may receive information such as your name and contact details from our marketing partners. In certain instances, this information may also include the marketing content you viewed or the actions you took in Defexa App or on our Website.

Please note that we use this information to help us provide and improve our Services, to communicate with you, and to comply with legal and regulatory requirements.

## WHAT ARE THE PURPOSES OF COLLECTION YOUR DATA?

### **To deliver Services**

In order to offer and deliver our Services, we will utilize your personal information in the following ways:

To facilitate your access and use of our Services.

To provide and deliver products and Services that you have requested from us.

To process and finalize transactions and send you relevant information, such as purchase confirmations and invoices.

To send you information regarding technical updates, confirmations, security alerts, and support and administrative messages.

### **To act under the law**

We may use your personal information to comply with all applicable laws, as well as respond to lawful requests and legal processes. This may include providing information to government authorities in response to subpoenas or other requests.

### **To keep in touch with you**

In order to keep you informed about the latest product and service offerings from our company and chosen partners, we utilize your personal information as a means of communication. This includes updates on promotions, upcoming events, and other noteworthy news.

### **To develop Defexa App**

To provide, maintain, debug, improve, and enhance our Website and Services. To enhance the quality of Defexa Wallet and ensure a seamless User experience, we may leverage your personal information to facilitate the operation, maintenance, and improvement of our Services. Additionally, we may utilize your information to promptly address any comments or inquiries you may

have regarding the Defexa App, and to offer general User support to you and others.

## **ARE WE SHARING YOUR PERSONAL DATA WITH THIRD PARTIES?**

At Defexa App, safeguarding our Users' personal information is integral to our business practice. We do not engage in the sale of our users' personal data to any external entities. However, in the course of our business operations and nature of our business in general, we may share personal data with service providers or third-party entities as Defexa App is a non-custodial crypto wallet providing software Services to the Users via which they are able to use various third-party products and services ("Third Party Services"). These third-party service providers are only granted access to specific personal data, such as your public wallet address to carry out their designated functions and are strictly prohibited from utilizing it for any other purpose. Additionally, they are contractually bound to process this information in accordance with applicable data protection regulations and our agreements.

Furthermore, we may share non-personally identifiable information with our partners, including publishers, advertisers, developers, or rights holders, both publicly and privately.

## **HOW WE SECURE YOU PERSONAL DATA?**

We keep the information we collect for as long as it is necessary to fulfill the purposes described in this Privacy Policy. Additionally, we may retain personal information for compliance with applicable laws, preventing fraud, resolving disputes, troubleshooting problems, assisting with investigations, enforcing our Terms of Use, and other legally permitted actions. To decide how long we should keep personal information, we take into account the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure, the purpose of processing the data, whether other means can achieve the same goal, and the legal requirements. Sometimes we may anonymize your personal information so that it can't be associated with you anymore. In this case, we may use this information without notifying you indefinitely.

We use industry-standard security measures to protect all the information submitted through our Services. However, the internet is not 100% secure, and we cannot guarantee the security of information transmitted through it. We are not responsible for any interception or interruption of

communications through the internet or any data changes or losses. Users are responsible for maintaining the security of any passwords, including a seed phrase you set to secure your wallet, biometrics, user IDs, or other authentication forms used to access password-protected or secure areas of our software Services. To protect you and your data, we may suspend your use of any Services without notice if we suspect a security breach.

## **DO WE RETAIN YOUR DATA?**

Even if you delete your Wallet or addresses from the Defexa Wallet, uninstall the Defexa App from your device, or ask us to delete your information, we may still keep some of it to follow the law or keep Defexa Wallet working properly. If you have any questions or concerns about how we use your information, please email us at [privacy@defexa.io](mailto:privacy@defexa.io).

## **WHAT IF I AM A USER FROM THE EU OR UK?**

If you are in the European Union or the United Kingdom, we only process your personal data under a valid "legal basis," such as:

<b>Consent</b>	We will only use your personal data if you have given your consent, such as to send you marketing emails or to use cookies.
<b>Contractual necessity</b>	We need your personal data to provide you with our Services, such as responding to your inquiries.
<b>Legal obligation</b>	We are legally required to use your personal data, such as to comply with tax and accounting obligations.
<b>Legitimate interests</b>	We or a third party have a legitimate interest in using your personal data. For instance, we have a legitimate interest in using your data for product development and internal analytics purposes, and to enhance the safety, security, and performance of Defexa App, Website and Services. We only rely on our or a third party's legitimate interests to process

your personal data when these interests are not outweighed by your rights and interests.

## **CHILDREN ACCESS**

If you are not of legal age in your place of residence, you can only use the Services with the permission or supervision of your parent or legal guardian. As required by the Children’s Online Privacy Protection Act (COPPA), if we discover that we have obtained information directly from a child under 13 years of age without obtaining verified consent from their parent or legal guardian, we will only use that information to directly respond to the child (or their parent or legal guardian) and inform them that the child cannot use the Defexa App and Website. After that, we will delete the information.

## **NOTICES AND UPDATES OF PRIVACY POLICY**

If you choose to use Defexa Wallet, your use and any dispute over privacy is subject to this Privacy Policy and our Terms of Use. If you have any concerns about privacy at Defexa Wallet, please contact us with a complete description, and we will try to resolve it. We reserve the right to update and revise this Privacy Policy at any time. We occasionally review this Privacy Policy to make sure it complies with applicable laws and conforms to changes in our business. If we do revise this Privacy Policy, we will update the “Effective Date” at the bottom of this page so that you can be well notified if it has changed since your last visit. Please review this Privacy Policy regularly to ensure that you are aware of its terms. Any use of Defexa Wallet after an amendment to our Privacy Policy constitutes your acceptance of Privacy Policy in revised or amended version.

## **HAVE QUESTIONS?**

We are delighted to assist with any inquiries you may have. Please feel free to contact us via email [privacy@defexa.io](mailto:privacy@defexa.io)

Thank you for taking the time to read through our Privacy Policy!