Arcex - Privacy Policy

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1. INTRODUCTION

Arcex Inc. ("Arcex," "we," "us") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, share, and protect information in connection with your use of the Arcex Platform (the "Services"). By using our Services, you agree to the collection, use, and sharing of your information as described in this Privacy Policy.

2. INFORMATION WE COLLECT

We collect the minimum information necessary to provide our Services and ensure compliance. As a non-custodial platform, we do not collect sensitive financial information related to your direct holdings.

- 2.1. Information You Provide:
 - Email Address: When you create an account, we collect your email address via Privy. We store this email in an encrypted format in our Supabase database.
- 2.2. Information Collected Automatically:
 - Location Information: We collect location data derived from your IP address. This is used exclusively to enforce our geofencing policy and ensure we do not provide Services in Restricted Locations as defined in our Terms of Service.
 - Device and Usage Data: We use analytics services like Datadog and Firebase to automatically collect information about your device, browser, and how you interact with our Platform. This may include your IP address, device type, operating system, browser type, and other diagnostic and performance data. This helps us improve our Services, troubleshoot issues, and monitor for security threats.
- 2.3. Information from Third-Party Infrastructure:
 - Our backend and hosting infrastructure are built on Amazon Web Services (AWS). We use Cloudflare for security and performance, which processes traffic data on our behalf. These services may process data as part of their function in providing infrastructure for the Arcex Platform.

3. HOW WE USE YOUR INFORMATION

We use your information for the following limited purposes:

- To Provide and Secure Our Services: To operate the Platform, authenticate users, and strictly enforce our geographic restrictions.
- For Analytics and Improvement: To understand user behavior, improve the user experience, and for security and performance monitoring.

- To Comply with Legal Obligations: To enforce our Terms of Service and comply with applicable laws, regulations, and valid legal processes.
- For Communication: To send you important notices regarding your account or respond to your support requests sent to hello@arcex.app.

4. HOW WE SHARE YOUR INFORMATION

We do not sell your personal information. We only share it with the following parties as necessary to provide our Services:

- Service & Infrastructure Providers: With third-party vendors that help us operate, such as AWS(backend and hosting infrastructure), Supabase (database), Vercel (landing page), Datadog(analytics), Firebase (analytics/infrastructure), and Cloudflare (security/performance). These providers are contractually obligated to protect your data and are prohibited from using it for any other purpose.
- Legal Requirements: If required by law, we may disclose your information to law enforcement or in response to a valid legal process, such as a court order or subpoena.
- Corporate Transactions: In the event of a merger, acquisition, or sale of assets, your information may be transferred as part of that transaction, subject to the promises made in this Privacy Policy.

5. THIRD-PARTY SERVICES AND POLICIES

Our Services are integrated with various third-party services, protocols, and providers. These third parties have their own terms of service and privacy policies that govern their services. We are not responsible for the policies or practices of these third parties. We strongly recommend that you read their policies to understand how your information is handled.

- Core Trading Protocols:
 - Orderly Network: <u>Terms of Service</u> | <u>Privacy Policy</u>
 - 0x Protocol: Terms of Service
- Key Infrastructure and Service Providers:
 - Amazon Web Services (AWS): Privacy Notice
 - Supabase: Privacy Policy
 - Cloudflare: Privacy Policy
 - Vercel: Privacy Policy
 - Datadog: Privacy Policy
 - Google (Firebase): Privacy Policy
 - Privy: <u>Privacy Policy</u>

6. DATA SECURITY AND RETENTION

• 6.1. Security: We implement strong technical and administrative security measures, including encrypting user emails at rest, to protect your information

- from unauthorized access, use, or disclosure. However, no system is 100% secure, and we cannot guarantee the absolute security of your information.
- 6.2. Retention: We retain your data only for as long as necessary to provide our Services, for legitimate business purposes (such as security and fraud prevention), and to comply with our legal obligations. When we no longer have a legitimate need to process your information, we will either delete or anonymize it.

7. YOUR RIGHTS AND CHOICES

Depending on your jurisdiction, you may have certain rights regarding your personal information.

- 7.1. Your Rights: These rights may include:
 - Right to Access: The right to request a copy of the personal information we hold about you.
 - Right to Rectification: The right to request that we correct any inaccurate or incomplete information.
 - Right to Restrict Processing: The right to request that we limit the processing of your personal information in certain circumstances.
- 7.2. Account Deletion: You may request to delete your account at any time. Upon receiving a deletion request, we will erase your personal information, such as your encrypted email address. Please note that we may be required by law or for legitimate business purposes (like security, fraud prevention, and legal compliance) to retain certain anonymized or aggregated data.
- 7.3. Exercising Your Rights: To exercise any of these rights, including account deletion, please contact us at hello@arcex.app. We may need to verify your identity before processing your request.

8. CROSS-BORDER DATA TRANSFERS

Arcex operates globally, and your information may be transferred to, stored, and processed in countries other than your own, including the United States. These countries may have data protection laws that are different from those in your country. We take appropriate measures to ensure that your personal information remains protected when it is transferred internationally.

9. CHILDREN'S PRIVACY

The Arcex Platform is not intended for individuals under the age of 18. We do not knowingly collect personal information from children. If we become aware that we have collected personal information from a child, we will take steps to delete it promptly.

10. ELECTRONIC COMMUNICATIONS

By using the Services, you consent to receiving privacy-related notices and disclosures from us in electronic form, including via email or by posting notices on the Arcex Platform.

11. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. We will notify you of any material changes by posting the new policy on our Platform and updating the "Last Updated" date. Your continued use of the Services after any changes constitutes your acceptance of the new Privacy Policy.

12. CONTACT US

If you have any questions about this Privacy Policy or our data practices, please contact us at hello@arcex.app.