



PRIVACY POLICY

Last Updated: June 23, 2026

This Privacy Policy is issued by **Coinsub.io** (hereinafter “Coinsub,” “**We**,” or “**Us**”) and governs your use of our website (<https://coinsub.io/>), and any other web services, portals, or technology solutions owned or offered by Us (collectively, the “**Services**”). The term “**You**” or “**User**” refers to any individual or business that accesses, uses, or submits information through the Services.

This Privacy Policy is global in nature and applies to Personal Information collected through Coinsub’s digital services, offline interactions, and through business relationships with customers, vendors, and suppliers. Depending on the context, Coinsub acts as a data controller, a data processor, and in limited cases a joint controller with merchants. Depending on your relationship with Coinsub, the Privacy Policy may apply differently to you.

By accessing or using the Services or by engaging with us offline, you acknowledge that we may collect and use your Personal Information as described in this Privacy Policy and in accordance with applicable law.

BY VISITING, SIGNING UP FOR, USING, OR ACCESSING THE SERVICES, OR BY ENGAGING WITH COINSUB OFFLINE, YOU CONSENT TO THE PRACTICES DESCRIBED IN THIS POLICY. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, DO NOT USE THE SERVICES OR PROVIDE INFORMATION TO COINSUB.

1. INFORMATION WE COLLECT

(a) Personal Information:

Your information about you that specifically identifies you or, when combined with other information we have, can be used to identify you. Generally, we do not collect Personal Information about you when you visit and/or use the Services, unless you choose to provide such information to us. Submitting Personal Information through the Services is voluntary. By doing so, you are giving us your permission to use the information for the stated purpose.

- **Legal Basis for collecting your Personal Information.** Our legal basis for processing your Personal Information under the General Data Protection Regulation (GDPR) includes your consent (Article 6(1)(a)), the performance of a contract (Article 6(1)(b)), and our legitimate interests (Article 6(1)(f)). We collect, process, and use your information for the purposes described in this Privacy Policy, based at least on one of the following legal grounds:
 - **With your consent:** We ask for your agreement to process your information for specific purposes, and you have the right to withdraw your consent at any time.
 - **When Performing this Agreement:** We collect and process your Personal Information to provide you with the Services, following your acceptance of this Privacy Policy; to maintain and improve the Services; to develop new

services and features; and to personalize the Services for you to get a better user experience.

- **Legitimate interests:** We process your information for our legitimate interests while applying appropriate safeguards that protect your privacy. This means that we process your information for things like detecting, preventing, or otherwise addressing fraud, abuse, security, usability, functionality or technical issues with protecting against harm to the rights, property or safety of our properties, or our users, or the public as required or permitted by law; enforcing legal claims, including investigation of potential violations of this Privacy Policy; in order to comply and/or fulfill our obligation under applicable laws, regulation, guidelines, industry standards and contractual requirements, legal process, subpoena or governmental request.
- **Types of Information.** Through the Services, we may collect information that identifies, relates to, describes, or could reasonably be associated with an individual. This may occur when you voluntarily provide such information to us through our website, platforms, or communications. The categories of Personal Information we may collect include:
 - Full Name;
 - Mailing Address;
 - Email address;
 - Phone number;
 - Demographic Data (such as age, gender, zip code)
 - Government-issued identification information (such as driver's license or state ID)
 - Any other information you choose to provide that is similar to the above and can reasonably be used to identify you
- **Storage of Personal Information.** We will take reasonable precautions, as well as physical, technical, and organizational measures in accordance with industry standards, as described herein, to protect your Personal Information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. Computer safeguards, such as firewalls and data encryption may be used to protect your information. However, the security of information on or transmitted via the Internet cannot be guaranteed. Unauthorized entry of use, hardware or software failures, and other factors may compromise the security of your Personal Information. All information you send to us electronically or through email is not secure. Any transmission is at your own risk as the transmission of information via the Internet is not completely secure.
- **Children's Privacy.** The Services are not directed to or intended for use by children under 13 years of age. If you believe that a child under 13 may have provided us with Personal Information, please contact us at support@coinsub.io.

- **Special Category/Sensitive Data.** We do not intentionally collect special categories or sensitive data unless required by law or necessary for a specific purpose with an appropriate legal basis and safeguards.

(b) **NON-PERSONAL INFORMATION**

We collect and temporarily store certain information about your usage of the Services. Non-Personal Information means information that alone cannot identify you, including data such as cookies, pixel tags, web beacons and device information. The information includes, without limitation:

- **Device Data:** We may collect information such as: the type of computer and/or mobile device you use; the unique device ID of your computer and/or mobile device; the IP address of your computer and/or mobile device; the operating system of your computer and/or mobile device; and the type of mobile internet browsers of your computer and/or mobile device.
- **Usage details:** When you access and use the Services, we may automatically collect certain details of your access to and use of the Services, including traffic data, location data, logs and other communication data and the resources that you access and use on or through the Services.
- **Location information-** When you first visit or use the Services, we may request permission to collect and use your device's precise geolocation. You can opt not to permit the collection of this information, but you may not be able to use the Services provided by Coinsub without access to your location. We need your location information in order to provide our Services. You can control how and whether we collect your precise geolocation information through your device's settings.

If you do not want us to collect this information, you may either change your device's privacy settings or do not access or use the Services.

2. **INFORMATION COLLECTION TECHNOLOGIES**

The technologies we use for automatic information collection may include:

- (a) **Cookies (or mobile cookies):** We may use Cookies to help you personalize your online experience. A Cookie is a text file that is placed on your hard disk by a web page serve ("**Cookies**"). Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. The purpose of a cookie is to tell the web server that you have returned to a specific page. You have the ability to accept or decline Cookies. Most web browsers automatically accept Cookies, but you can usually modify your browser setting to decline Cookies if you prefer. If you choose to decline Cookies, you may not be able to fully experience the interactive features of the Services.

- (b) **Cross Device Matching.** To determine if users have interacted with content across multiple devices and to match such devices, we may work with partners who analyze device activity data and/or rely on your information (including demographic, geographic and interest-based data). To supplement this analysis, we may also provide de-identified data to these partners. Based on this data, we may then display targeted advertisements across devices that we believe are associated or use this data to further analyze usage of Services across devices.

3. HOW WE USE YOUR INFORMATION

We use information collected as described in this Privacy Policy for the following:

a) Operation

- Operate, maintain and improve the Services;
- Provide you with the Services and its contents, and any other information, products or services that you request from us;
- Send you reminders, technical notices, updates, security alerts, support and administrative messages and marketing messages;
- Request customer feedback;
- Answer your questions and respond to your requests;
- Ensure that content from our Services is presented in the most effective manner for you and for your computer or device for accessing the Services;
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including the Terms and Conditions; and
- Notify you when there are changes to any services we offer or provide through the Services.

b) Usage and Analytics

- Estimate our audience size and usage patterns;
- Perform analytics and conduct customer research;

c) Location:

We will use location data for the following reasons:

- To provide our Services targeted to your geographical area;
- To display information that is relevant to your particular location.

4. WHEN WE SHARE YOUR PERSONAL INFORMATION

The Personal Information you provide to us whether voluntarily or automatically, may be used and disclosed without limitations, in the following instances:

(a) **With vendors who provide services for us (who are required to protect the Personal Information)** – We may share Personal Information for business purposes with service providers that provide us with services for the purpose of operating the Services, opening, and operating your account, as well as providing ancillary services and solutions. These include, among others, hosting services, billing and payment processors and vendors, community management services, data and cybersecurity services, web analytics and performance tools, translation tools, IT and SaaS services, session recording, communication systems, mailing systems, data optimization and marketing services, data enrichment services, legal and financial advisors or technical consultants. All credit, debit, or prepaid card information collected by Coinsub, or any applicable payment processor will be stored and processed in compliance with applicable payment card industry standards. Consistent with applicable legal requirements, we take appropriate technical and organizational measures to require third parties to adequately safeguard your personal information and only process it in accordance with our instructions.

(b) **To comply with legal requirements** – We may disclose your Personal Information in connection with a merger, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other sale or transfer of some or all of our assets, whether as part of a going concern or as part of a bankruptcy or similar proceeding. In such cases, your Personal Information may be transferred to a prospective or actual buyer, successor, or assignee of Coinsub. We may also disclose your Personal Information to comply with applicable laws, regulations, legal processes (such as subpoenas, court orders, or warrants), or in response to lawful requests by public authorities, including law enforcement or regulatory agencies. Additionally, we may disclose your information when necessary to protect our legal rights, enforce our terms, safeguard our intellectual property, or ensure the safety of our users and others.

5. HOW WE DISCLOSE YOUR NON-PERSONAL INFORMATION

We may also disclose Non-Personal Information:

- For the same reasons, we might share Personal Information;
- With our advertisers for their own analysis and research;
- To facilitate targeted content and ads; or
- With Third-Party Ad Servers to place our ads on the Services and on third-party websites or mobile applications.

6. SECURITY AND DATA RETENTION

The security of your Personal Information is important to us. We seek to protect your Personal Information from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the

type of Personal Information and how we are processing that data. We endeavor to follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and in storage. For example, the Services use industry standard Secure Sockets Layer (SSL) technology to allow for the encryption of Personal Information. We store and process your information on our servers in the United States and abroad. We maintain what we consider industry standard backup and archival systems. Although we work to protect the security of the data that we hold in our records, for example, by making good faith efforts to store Personal Information in a secure operating environment that is not open to the public, please be aware that no method of transmitting data over the Internet or storing data is completely secure. While we use commercially reasonable measures to protect your Personal Information, no transmission or storage system can be guaranteed to be 100% secure. You acknowledge that any transmission of data is at your own risk.

If at any time during or after our relationship we believe that the security of your Personal Information may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we will endeavor to notify you as promptly as possible under the circumstances. If we have your e-mail address, we may notify you by e-mail to the most recent e-mail address you have provided us. If you receive a notice from us, you can print it to retain a copy of it. To receive these notices, you must check your e-mail account using your computer or mobile device and email application software. You consent to our use of e-mail as a means of such notification. If you prefer for us to use the U.S. Postal Service to notify you in this situation, please e-mail us at support@coinsub.io. Please include your address when you submit your request. You can make this election any time, and it will apply to notifications we make after a reasonable time thereafter for us to process your request. You may also use this e-mail address to request a print copy, at no charge, of an electronic notice we have sent to you regarding a compromise of your Personal Information.

We retain Personal Information about you consistent with all internal policies and procedures. We may retain Personal Information to comply with our legal obligations, resolve disputes or collect fees owed, or as is otherwise permitted or required by our data retention policies and procedures.

7. COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

We represent and warrant that we will comply with all applicable laws, rules, regulations, directives, and guidelines regarding the collection, use and disclosure of data collected from or about Users or specific devices which apply to the services utilized hereunder. The term “**Rules**” shall include, without limitation, (i) United States Federal Trade Commission Laws regarding the collection, use and disclosure of data from or about users and/or specific devices; (ii) the Children’s Privacy Protection Act of 1998 (“**COPPA**”); (iii) any state data privacy laws, and (iv) the Rules of any other jurisdiction, including the United Kingdom General Data Protection Regulation (“**UK GDPR**”) and the European Union General Data Protection Regulation (“**EU GDPR**”), rules, regulations and/or directives promulgated by a pertinent Data Protection Act, and all amendments

and updates to them or regulations as replaced or superseded from time to time. Under GDPR, you have the following rights to your personal data:

- Right to information
- Right to correction or deletion,
- Right to restriction of processing,
- Right to refusal of processing,
- Right to data portability.

You also have the right to lodge a complaint about our processing of your personal data with a data protection regulatory body.

8. UPDATES TO THIS POLICY

We reserve the right to change, modify, update, add, or remove portions of this Privacy Policy at any time. We will indicate the date the Privacy Policy was last updated at the top of the page. If you opt out of receiving communications, you may not receive certain notifications, however, they will still govern your use of the Services, and you are responsible for proactively checking for any changes. We encourage you to check this Privacy Policy frequently to stay up to date on any changes. You can determine if changes have been made by checking the effective date on the Privacy Policy. Continued use of the Services after the effective date of any change in this Privacy Policy will constitute acceptance of such changes and it will signify that you agree to abide by and be bound by the modified Privacy Policy.

9. CONTACT US

If you have questions, comments, or concerns regarding this Privacy Policy, please contact us and we will respond to your request within a reasonable timeframe. Please include the following information in your request (a) Your name; (b) Your contact information, including phone number and email address; and (c) The precise nature of your request, inquiry, or complaint.

You may contact us at: support@coinsub.io