# PRIVACY POLICY

Last Updated: October 6th, 2025 Effective: October 6th, 2025

NockBox Inc. ("we," "us") operates cryptocurrency mining pool services at nockbox.org and pool.nockbox.org. This policy explains how we handle your data.

# NOTICE AT COLLECTION

What we collect: Identifiers (email, IP), network activity (mining data), commercial info

(transactions), geolocation, hardware specs **Why**: Service delivery, security, legal compliance **Your rights**: Access, delete, correct, port, opt-out

We don't sell your data

Contact: <a href="mailto:support@nockbox.org">support@nockbox.org</a> (subject: "Privacy Appeal")

#### 1. DATA WE COLLECT

#### You Provide

- Google/GitHub login (email, name)
- Wallet addresses for payouts
- Telegram handle (optional, with consent)
- Government ID & address proof (only if KYC required)

## **Automatically Collected**

- Mining: Shares, proof rates, hardware specs, worker IDs, connection logs
- **Network**: IP address (mandatory for sanctions), location, browser info
- Financial: Transaction amounts, block heights, payout status

### 2. HOW WE USE DATA

| Use                 | Legal Basis (GDPR)                     | Purpose          |
|---------------------|--|------------------|
| Mining operations   | Contract                               | Service delivery |
| Payouts             | Contract                               | Service delivery |
| Sanctions screening | Legitimate interest + Legal obligation | Compliance       |

| Use              | Legal Basis (GDPR)  | Purpose          |
|------------------|---------------------|------------------|
| Fraud prevention | Legitimate interest | Security         |
| Support          | Contract            | Service          |
| Telegram alerts  | Consent             | Optional feature |

## 3. DATA SHARING

Service Providers (under contract):

- Google Cloud (hosting)
- Cloudflare (security)
- Vercel (web hosting)
- ipdata.co (geolocation)
- Sumsub (KYC when required)

#### Other:

- Blockchain (public transactions)
- Law enforcement (valid legal process)
- Successors (merger/acquisition)

We maintain a sub-processor list at [URL] with 15-day change notice.

# 4. DATA RETENTION

| Туре                               | Period              | Reason            |
|------------------------------------|---------------------|-------------------|
| Compliance (KYC, sanctions alerts) | 5 years             | Legal requirement |
| Transactions >\$3,000              | 5 years             | Tax/AML           |
| Routine IP logs                    | 90 days             | Security          |
| Raw shares                         | 7 days → aggregated | Performance       |
| Account data                       | Active + 90 days    | Service           |

#### 5. YOUR RIGHTS

### Everyone

- ✓ Access your data
- ✓ Correct errors
- ✓ Delete account (except compliance/blockchain data)
- ✓ Export data (email us)
- ✓ Contest automated decisions
- ✓ Opt-out of marketing

#### California (CCPA)

Additional rights to know, delete, and non-discrimination. We honor GPC signals.

#### EU/UK (GDPR)

Additional rights to port, restrict, object, and complain to regulators.

Response time: 30 days (45 for complex) | Appeals: 45 days

#### 6. MANDATORY COMPLIANCE

### Sanctions (Cannot Opt Out)

- We must collect IPs for U.S. sanctions compliance
- Auto-block: Cuba, Iran, North Korea, Syria, Russia, Ukraine, Crimea regions
- VPN/Tor may trigger review
- Current blocks: [status page]

# KYC (When Required)

Triggered by: suspicious activity, VPN use, high volume, legal requirement

Data retained: 5 years Processor: Sumsub

Non-compliance = suspension

# **Blockchain Transparency**

Wallet addresses and transactions are permanently public.

#### 7. AUTOMATED SYSTEMS

We use automation for:

- Geo-blocking (sanctions)
- VPN detection
- Share validation
- Payouts

Your rights: Request human review, contest decisions, understand logic

Contact: support@nockbox.org

#### 8. SECURITY

- Encryption (transit/rest)
- Access controls
- WAF/DDoS protection
- 24/7 monitoring
- Regular audits

No system is 100% secure. Secure your wallet keys.

#### 9. COOKIES

Essential only (auth/security). Expire: 30 days max. No tracking/ads cookies. If we add them, we'll ask consent.

#### 10. INTERNATIONAL TRANSFERS

Your data may go to US/EU. We use:

- EU-US Data Privacy Framework
- Standard Contractual Clauses (2021/914)
- UK IDTA / Swiss provisions

#### 11. OTHER TERMS

Age: 18+ only

Breaches: Notice per law (72hr EU, varies US)
Texas Unclaimed Property: After 3 years
Updates: 30-day notice for material changes
No anonymous use: Required for compliance

#### 12. CONTACT

All inquiries: support@nockbox.org

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