

## Travaleo Privacy Policy

### 1. Introduction

This Privacy Policy explains how Travaleo (“we,” “us,” or “our”) collects, uses, discloses, and protects personal data in connection with access to and use of the Travaleo platform, website, services, communications, and investment offerings. This policy is intended to comply with applicable data protection laws, including, as relevant, the EU General Data Protection **Regulation (GDPR) and comparable data protection frameworks in other jurisdictions.**

### 2. Scope of this Policy

This Privacy Policy applies to personal data we collect from users, investors, prospective investors, website visitors, service providers, and business partners. This policy does not apply to information collected by third-party websites or services that may be linked from our platform.

### 3. Data Controller

For purposes of applicable data protection law, Travaleo acts as the data controller for personal data collected through the platform, except where otherwise stated. Where required, Travaleo may designate a representative in the European Union or other jurisdictions.

### 4. Personal Data We Collect

We may collect the following categories of personal data:  
- Identification information (name, address, date of birth)  
- Contact information (email address, phone number)  
- Account credentials  
- Investor eligibility information (including accreditation status where applicable)  
- Government identification data as required for compliance  
- Financial or transactional information related to investments  
- Blockchain wallet addresses or transaction identifiers  
- Usage data, IP address, device identifiers, and cookie data  
- Communication records and preferences

### 5. Special Categories of Data

We do not intentionally collect sensitive personal data unless necessary for legal or regulatory purposes. Where such information is required, we will process it only where permitted by applicable law and subject to appropriate safeguards.

### 6. How We Collect Personal Data

We collect personal data when you:  
- Register for an account or submit information through the platform  
- Make an investment or submit a subscription agreement  
- Communicate with us by email or via the platform  
- Participate in identity verification or KYC/AML processes  
- Visit our website or use cookies and similar technologies

### 7. Legal Basis for Processing (GDPR)

Where GDPR applies, we process personal data under one or more of the following legal bases:  
- Performance of a contract  
- Compliance with legal obligations (including securities and AML laws)  
- Legitimate business interests (platform operation, security, improvement)  
- Consent, where required by law  
- Establishment, exercise, or defense of legal claims

### 8. How We Use Personal Data

We may use personal data for the following purposes:  
- Operating and improving the Travaleo platform  
- Verifying identity and investor eligibility  
- Complying with KYC/AML, sanctions, and securities regulations  
- Administering investments and ownership records  
- Communicating with users and investors  
- Facilitating blockchain transactions and smart contract execution  
- Preventing fraud and protecting platform security  
- Meeting audit, compliance, and recordkeeping obligations

### 9. Automated Decision Making

We may use automated processes in identity verification, sanctions screening, fraud monitoring, or transaction review. Where required by law, affected individuals may request human review and contest the decision.

## **10. Cookies and Tracking Technologies**

We use cookies and similar technologies to enhance website functionality, analyze usage, and personalize user experience. Where legally required, we will obtain consent prior to placing non-essential cookies. Users may manage cookie preferences through browser settings.

## **11. Disclosure of Personal Data**

We may share personal data with:<sup>[1]</sup> Subsidiaries and affiliated entities<sup>[1]</sup> KYC/AML and sanctions screening service providers<sup>[1]</sup> Blockchain or tokenization infrastructure providers<sup>[1]</sup> Legal, tax, and accounting advisers<sup>[1]</sup> Payment processors and custodians<sup>[1]</sup> Regulators, government authorities, or law enforcement when required by law<sup>[1]</sup> We do not sell personal data.

## **12. International Data Transfers**

Personal data may be transferred to jurisdictions outside your home country, including jurisdictions that may not provide the same level of data protection. Where required by law, we use appropriate safeguards such as Standard Contractual Clauses or equivalent mechanisms.

## **13. Data Retention**

We retain personal data only as long as necessary for the purposes described in this policy, including legal, regulatory, accounting, and reporting obligations. Retention periods may be extended as necessary for the establishment, exercise, or defense of legal claims.

## **14. Data Security**

We implement commercially reasonable technical and organizational measures to protect personal data from loss, misuse, unauthorized access, disclosure, or alteration. However, no method of transmission or storage is completely secure and we cannot guarantee absolute security.

## **15. Your Rights (Including GDPR Rights)**

Depending on your jurisdiction, you may have the following rights:<sup>[1]</sup> Right to access your personal data<sup>[1]</sup> Right to rectification of inaccurate data<sup>[1]</sup> Right to erasure ("right to be forgotten")<sup>[1]</sup> Right to restrict or object to processing<sup>[1]</sup> Right to data portability<sup>[1]</sup> Right to withdraw consent where processing is based on consent<sup>[1]</sup> Right to lodge a complaint with a data protection authority

## **16. Children's Privacy**

The Travaleo platform is not intended for minors under applicable law, and we do not knowingly collect personal data from children.

## **17. Third-Party Links**

Our platform may contain links to third-party websites or services. We are not responsible for the privacy practices or content of those third parties.

## **18. Changes to This Policy**

We may update this Privacy Policy from time to time. The "Last Updated" date will reflect the latest revision. Your continued use of the platform after changes become effective constitutes acceptance of the revised policy.

## **19. Contact Information**

If you have questions or wish to exercise rights regarding your personal data, please contact us using the contact information provided on the Travaleo platform or website.

Travaleo, LLC (all rights reserved)

30 N Gould St Ste R

Sheridan, WY 82801

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