

# Privacy Policy

This Privacy Policy (the “Policy”) explains how FOMO BULL CLUB (“FBC,” “we,” “us,” or “our” depending on the context) collects, uses, and shares personal data and information in connection with the FBC platform available from: <https://fomobull.club/> and all of our other properties, products, and services operated and provided by us (the “Services”) in case of the user’s usage (“you”, “your”, “yours” depending on the context). Your use of the Services is subject to this Policy as well as our.

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## Introduction

This Privacy Policy incorporates by this reference our Terms of Service and any updates and new rules, new policies, and new codes of conduct. Except as otherwise indicated, any reference to the “Privacy Policy” shall include our Terms of Service.

All the data processing is made in full compliance with various laws in the United States (U.S.), the European Economic Area (EEA) as well as the United Kingdom (UK) and others.

This Privacy Policy may change from time to time and your continued use of our products or services constitutes your acceptance of those changes. We encourage you to review this Privacy Policy periodically.

IN THE EVENT OF ANY INCONSISTENCY OR CONFLICT BETWEEN THIS PRIVACY POLICY AND THE TERMS AND CONDITIONS OF SERVICE, THE MUTUAL CONFORMITY AND CONSISTENT INTERPRETATION ARE NEEDED TO BE SEEKED, OR THE FOLLOWING ORDER OF PRECEDENCE SHALL CONTROL: (A) THE TERMS OF SERVICE; AND (B) THE PRIVACY POLICY.

## High-Level Summary

- FBC is a set of smart contracts deployed across various Layer 1 and Layer 2 blockchains. FBC does not govern it.
- FBC does not collect and store personal data, such as first name, last name, street address, date of birth, email address, or IP address, in connection with your use of the Services despite them being possibly processed by the third-party KYC providers.
- FBC collects non-identifiable data, such as public on-chain data, and limited off-chain data like device type, browser version, etc. This is to help drive production vision, not track users. This data can not be used for the identification or tracking of the users.
- If you specifically sign up to receive emails from us, we will store your email address to allow us to send you those emails. You can unsubscribe at any time. We will not attempt to link your email address to your wallet address, IP address, or other personal data.
- FBC continues to explore methods to further protect consumers' privacy, such as opt-out prompts, migrating to privacy-centric tooling, and deploying proxies to anonymize network traffic.
- Users are empowered to explore client-side privacy techniques and tools for securing their personal data.
- Any material changes to privacy will be reflected in an updated privacy policy.
- We can not be found responsible for any third-party services used by you and processing your data while using FBC. These services are subject to individual terms and conditions as well as privacy policies.

## Data We Collect

Privacy is central to everything we do at FBC. We aspire to be transparent about what little data we do collect. We do not maintain user accounts and do not collect and store personal data, such as your name or internet protocol ("IP") address as this is provided with the use of incorporated third-party service. When you interact with the Services, we collect only:

- *Publicly-available blockchain data.* When you connect your non-custodial blockchain wallet to the Services, we collect and log your publicly available blockchain address to learn more about your use of the Services and to screen your wallet for any prior illicit activity. We may screen your wallet using intelligence provided by leading blockchain analytics providers (in such case you are being informed). Note that blockchain addresses are publicly available data that are not created or assigned by us or any central party and by themselves are not personally identifying.
- *Information from local storage and other tracking technologies.* We and our third-party services providers may access and collect information from localStorage, mobile deviceID, cookies, web beacons, and other similar technologies to provide and personalize the Services and features of the Services for you across sessions (with the purpose of efficient providing of Services). For example, we may use this information to remember tokens you import, star, or add to your shopping bag. We may also use this information to learn about

your preferences, your use of the Services, and our interactions with you. Information we collect from these technologies may include things such as browser type, referring/exit pages, operating system, device or browser language, and other device information. We group and analyze these user journeys collectively, in the aggregate, to improve our product user experience.

- *Information from other sources.* We may receive information about your wallet address or transactions made through the Services from our service providers in order to comply with our legal obligations and prevent the use of our Services in connection with fraudulent or other illicit activities.
- *Survey or usability information.* If you participate in a survey or usability study with us, we will record any biographical information you directly provide to us (for example, your name, email, and job title), the responses you provide to us, and your interactions with the Services. For this purpose you provide us with informed consent.
- *Correspondence.* We will receive any communications and information you provide directly to us via email, customer support, social media, or another support channel (such as Twitter or Discord), or when you participate in any surveys or questionnaires.
- *Information you specifically provide us.* If you specifically provide us with information (such as your email address), we may use that information for the purposes described when you provide it to us and only for them. We will not attempt to link any information you provide to your wallet address, IP address, or other personal data. You do not need to provide us with any personal data to use the Services.

## How We Use Data

We use the data we collect in accordance with your instructions, including any applicable terms in our Terms of Service, and as required by law. We may also use data for the following purposes:

- *Providing the Services.* We use the data we collect to provide, maintain, customize, and improve our Services and their features.
- *Customer support.* We may use information to provide customer support for and answer inquiries about the Services.
- *Safety and security.* We may use data to protect against, investigate, and stop fraudulent, unauthorized, or illegal activity. We may also use it to address security risks, solve potential security issues such as bugs, enforce our agreements, and protect our users and FBC.
- *Legal compliance.* We may use the information we collect as needed or requested by regulators, government entities, and law enforcement to comply with applicable laws and regulations.
- *Aggregated data.* We may use some of the information we collect or access to compile aggregated data that helps us learn more about how users use the Services and where we can improve your experience.

All the purposes are based on the regulatory requirements, legitimate expectations or - when necessary - on the informed consent of you as the user of our services provided tacitly by using our Services or by agreeing with this Privacy Policy, as stated above.

Where the legitimate interest is mentioned, we have prepared all the necessary balance tests comparing our interests and needs with your rights and your protection. All the activities performed based on the legitimate interest are performed with the minimization of personal data processing and their use being our normative benchmark.

Data is not being used for any kind of profiling your personality or any kind of social engineering. The data is subject to automated processing but never an automated decision-making. If such activities would be necessary to be performed, you would be informed in advance to opt-out of such activities.

## How We Share Data

We may share or disclose the data we collect:

- *With service providers.* We may share your information with our service providers and vendors to assist us in providing, delivering, and improving the Services. For example, we may share your wallet address with service providers like Infura and Cloudflare to provide technical infrastructure services, your wallet address with blockchain analytics providers to detect, prevent, and mitigate financial crime and other illicit or harmful activities, and your activity on our social media pages with our analytics provider to learn more about you interact with us and the Services.
- *To comply with our legal obligations.* We may share your data during litigation, regulatory proceedings, compliance measures, and when compelled by subpoena, court order, or other legal procedure. We may also share data when we believe it is necessary to prevent harm to our users or our Company and enforce our agreements and policies, including our Terms of Service.
- *Safety and Security.* We may share data to protect against, investigate, and stop fraudulent, unauthorized, or illegal activity. We may also use it to address security risks, solve potential security issues such as bugs, enforce our agreements, and protect our users, Company, and ecosystem.
- *Business changes.* We may transfer or share data to another entity in case of a merger, acquisition, bankruptcy, dissolution, reorganization, asset or stock sale, or other business transaction (based on the functional linking and co-existence within the complex business entity).
- *With your consent.* We may share your information any other time you provide us with your consent to do so. In such a case, informed consent is necessary and is being provided accordingly.

We do not share your information with any third parties for marketing purposes whatsoever. If this point would change you would be informed.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information and they have incorporated advanced

security measures under the latest security standards. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide Services to us and to you within the adequate legislation requirements. We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

All the data processors and third-party collaborators are being evaluated based on the set of guarantees and values needed to be met before providing them with the personal data.

## Third-Party Cookies

We use services provided by Google and other third parties that use tracking technology, such as cookies, deviceID, and localStorage, to collect information about your use of the Services and our interactions with you. You can opt out of having your online activity and device data collected through these third-party services, including by:

- *Blocking cookies in your browser* by following the instructions in your browser settings. For more information about cookies, including how to see them on your device, manage them, and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)
- *Blocking or limiting the use of your advertising ID* on your mobile device through the device settings.
- Using *privacy plug-ins* or browsers. Certain browsers and browser extensions can be configured to block third-party cookies and trackers.
- Using the *platform opt-out* provided by Google at <https://adssettings.google.com>. You can learn more about how Google uses your information by reviewing Google's privacy policy at <https://policies.google.com/privacy>

You should use advertising industry opt-out tools on each device or browser where you use the Services, available at <http://optout.aboutads.info> and <http://optout.networkadvertising.org>

## Third-Party Links and Sites

We may integrate technologies operated or controlled by other parties into parts of the Services. For example, the Services may include links that hyperlink to websites, platforms, and other services not operated or controlled by us. Please note that when you interact with these other parties, including when you leave the Site, those parties may independently collect information about you and solicit information from you. By consulting their privacy policies and other terms, you can learn more about how those parties collect and use your data.

In no case, we can be found responsible for any kind of information stated on third-party links and sites.

# Security

We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect data from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the Internet is not completely secure, and we cannot guarantee the security of information about you. You are responsible for all of your activity on the Services, including the security of your blockchain network addresses, cryptocurrency wallets, and cryptographic keys.

For the purpose of security, we have prepared an internal set of retention periods individually mapping our needs, the groups of personal data and their existence and usage for the purposes stated above.

Moreover, we have an internal systematics of processing activities records, regular audits and security breach methodics to analyze all the individual mistakes, errors or flaws within the agenda of personal data processing, to evaluate and to archive them.

We also perform a regular set of lectures and interactive meetings within our team to be on top of the current development as well as providing you with the most secure way of data processing possible.

When the personal data are not needed anymore, they are being deleted, anonymized or pseudonymized based on the best way of handling them in the context of internal retention periods systematics. If the data are being deleted or anonymized, all the related documents and information carriers share the same fate. All the process is then recorded into the protocol of deleting / anonymizing the data, which is then being archived in compliance with the adequate legislations.

# Age Requirements

The Services are intended for a general audience and are not directed at children. We do not knowingly receive personal information from children. If you believe we have received personal information about a child under the age of 18, please contact us.

# Disclosures for European Union Data Subjects

We process personal data for the purposes described in the section titled “How We Use Data” above. Our bases for processing your data include: (i) you have given consent to the process to us or our service providers for one or more specific purposes; (ii) processing is necessary for the performance of a contract with you; (iii) processing is necessary for compliance with a legal obligation; and/or (iv) processing is necessary for the purposes of the legitimate interested pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests.

Your rights under the General Data Protection Regulations (“GDPR”) include the right to (i) request access and obtain a copy of your personal data, (ii) request rectification or erasure of your personal data, (iii) object to or restrict the processing of your personal data; and (iv)

request portability of your personal data. Additionally, you may withdraw your consent to our collection at any time. Nevertheless, we cannot edit or delete information that is stored on a particular blockchain. Information such as your transaction data, blockchain wallet address, and assets held by your address that may be related to the data we collect is beyond our control.

Please, be aware that when exercising your rights we are entitled to ask you for more information on your identification to eliminate the efforts of misinterpretation, identity stealing or other solicit activities.

Moreover, some of the rights are procedurally difficult to provide and can take some period of time within which it can occasionally happen that you are being contacted, included or in other ways interacted with from our side even if you exercised the adequate rights.

Under the EAE/UK General Data Protection Regulation (GDPR), we are not accompanied by DPO (data protection officer) services as the agenda of personal data protection is handled by ourselves to provide you with the most possible security and accuracy of processing.

To exercise any of your rights under the GDPR, please contact us through the website. Please note that we may retain information as necessary to fulfill the purpose for which it was collected and may continue to do so even after a data subject request in accordance with our legitimate interests, including to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

## Disclosures for CCPA Subjects

You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge the (i) right for disclosure of personal data we collect about you (the categories of personal data, the categories of sources, business or commercial purpose for collecting data), (ii) right to deletion (from our records and any service providers), (iii) right to not be discriminated against by us

Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you if that difference is reasonably related to the value provided to our business by your personal information.

Please be aware that in the sense of CCPA regulations we are not accompanied by DPO (data protection officer) services as the agenda of personal data protection is handled by ourselves to provide you with the most possible security and accuracy of processing.

## Changes to this Policy

From time to time we may make changes to this Policy; your continued use of the Services reflects your periodic review of this Policy and other FBC terms and indicates your consent to them.

All the changes are being archived for the future needs.