

# ROXA DIGITAL PRIVACY POLICY

*Last Revised on November 27, 2023*

This Privacy Policy for Roxa Digital Ltd. (“**Company**”, “**we**”, “**us**”, “**our**”), describes how we collect, use and disclose information about users of the website marketplace.roxa.digital together with any content, tools, features and functionality offered on or through our website (collectively, the “**Website**”). For the purposes of this Privacy Policy, “**you**” and “**your**” means you as the user of the Website.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY USING OR ACCESSING THE WEBSITE, YOU AGREE TO THE USE OF YOUR INFORMATION IT DESCRIBES AND TO THE OTHER TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT ACCESS AND USE THE WEBSITE.

## 1. UPDATING THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time in which case we will update the “Last Revised” date at the top of this Privacy Policy. If we make changes that are material, we will use reasonable efforts to attempt to provide notice to you and, where required by applicable law or otherwise in our discretion, we will obtain your consent. Notice may be by email to you at the last email address you provided us, by posting notice of such changes on the Website, or by other means, consistent with applicable law. However, it is your sole responsibility to review the Privacy Policy from time to time to view any such changes. The updated Privacy Policy will be effective as of the time of posting, or such later date as may be specified in the updated Privacy Policy. **IF YOU DO NOT AGREE TO ANY UPDATES TO THIS PRIVACY POLICY PLEASE DO NOT ACCESS OR CONTINUE TO USE THE WEBSITE.**

## 2. COMPANY’S COLLECTION AND USE OF INFORMATION

When you access or use the Website, we may ask you to or you may provide us with certain categories of information as follows:

- The following contact details: name, email, phone number, and company name. We collect basic contact details to communicate with users of the Website and for security and compliance;
- Your digital wallet address, which we collect if you choose to participate in transactions for non-fungible tokens (“**NFTs**”) through the Website;
- The following performance metrics: marketing channel traffic and user demographics. We collect performance metrics in order to create aggregated, anonymized reports; and
- Any other information you choose to include in communications with us, for example, when contacting us through the Website.

Some features of the Website may require you to enter certain information about yourself. You may elect not to provide this information, but doing so may prevent you from using or accessing these features. Any information you provide in connection with those features will be used in connection with your use and access of those features.

We also automatically collect certain information about your interaction with the Website (“**Usage Data**”). To do this, we may use cookies, web beacons/clear gifs, other geolocation tracking technologies (“**Tracking Technologies**”). Usage Data may include:

- Unique device identifier;
- Device type, such as your phone, computer, or tablet;
- IP address;
- Browser type;
- Wallet type;
- Date and time stamps, such as the date and time you first accessed the Website;
- Operating system;
- Transaction history;
- Log data;
- Approximate location, including latitude and longitude;
- Time zone; and
- Other information regarding your interaction with the Website, such as clickstream data, ad impressions, primary market transactions and interactions with secondary marketplaces, collectibles and collections.

We use the information we collect automatically to improve the functionality of the Website, to facilitate transactions you initiate through the Website, to improve the security of your account, to monitor and manage your usage of the Website, to tailor features and content to you, to run analytics, and to better understand user interaction with the Website.

Finally, we may obtain the following information about you from third parties:

- Information we collect by going directly to third parties, as follows:
  - Career websites, such as LinkedIn. We use this information to process your application for employment.
- Information that you choose to share with us through third parties, as follows:
  - Your digital wallet provider, when you choose to link your digital wallet to the Website. We use this information to maintain your account.
- Information that other users of the Website may provide or share about you.

Any information we obtain from third parties will be treated in accordance with this Privacy Policy. We are not responsible or liable for the accuracy of the information provided to us by third parties and are not responsible for any third party's policies or practices. For more information, see Section 7.

In addition to the foregoing, we may use any of the above information to comply with any applicable legal obligations (including, without limitation, legal prohibitions in transacting with certain wallet addresses), to enforce any applicable terms of service, and to protect or defend the Website, our rights, the rights of our users, or others.

### **3. HOW THE COMPANY SHARES YOUR INFORMATION**

In certain circumstances, the Company may share your information with other parties. Such circumstances may include:

- With vendors or other service providers, such as:
  - Payment processors;
  - Cloud storage providers;
  - Marketing services vendors;
  - Security vendors;
  - Compliance vendors; and
  - Analytics services vendors;
- With our affiliates or otherwise within our corporate group for the purposes described in this Privacy Policy;
- With our Website partners to facilitate interoperability and the provision of the Website to you and for you to make payments;
- With third parties for marketing purposes;
- To comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries;
- In connection with an asset sale, merger, bankruptcy, or other business transaction;
- To enforce our Terms of Service;
- To ensure the safety and security of the Company and/or its users;
- When you request us to share certain information with third parties, such as through your use of social media widgets or login integrations; and
- With professional advisors, such as auditors, law firms, or accounting firms.

You acknowledge that such sharing of information may occur in all of the aforementioned circumstances and is permitted by and subject to this Privacy Policy.

#### **4. COOKIES AND OTHER TRACKING TECHNOLOGIES**

##### *Do Not Track Signals*

Your browser settings may allow you to transmit a “Do Not Track” signal when you visit various websites. Like many websites, our website is not designed to respond to “Do Not Track” signals received from browsers.

##### *Cookies and Other Tracking Technologies*

You may control the way in which your devices permit the use of Tracking Technologies, including by configuring your browser settings to use the Website without some cookie functionality. If you so choose, you may block or delete our cookies from your browser or set your browser to automatically delete cookies on a pre-determined schedule; however, blocking or deleting cookies may cause some of the Website, including any portal features and general functionality, to work incorrectly.

If you have questions regarding the specific information about you that we process or retain, as well as your choices regarding our collection and use practices, please contact us using the information in Section 12 below.

#### **5. USER GENERATED CONTENT**

Certain features of the Website may allow you to upload content directly to the Website, namely, profile names, first name, last name, a profile picture, or biography. For example, the Website may host user profile pages, discussion forums, email lists, and similar social platforms, which users may elect to join and/or participate in. The purpose of these features is to allow users to interact with each other. Through your participation, you may submit messages, photos, and other content (“**User-Generated Content**” or “**UGC**”). We or others may store, display, reproduce, publish, or otherwise use UGC, and may or may not attribute it to you. Others may also have access to UGC and may have the ability to share it with third parties. If you choose to submit UGC to any public area of the Website, your UGC will be considered “public” and will be accessible by anyone, including the Company.

Please note that we do not control who will have access to the information that you choose to make available to others, and cannot ensure that parties who have access to such information will respect your privacy or keep it secure. We are not responsible for the privacy or security of any information that you make publicly available on the features permitting creation of UGC or what others do with information you share with them on such platforms. We are not responsible for the accuracy, use, or misuse of any UGC that you disclose or receive from third parties.

#### **6. SOCIAL FEATURES**

Certain features of the Website permit you to initiate interactions between the Website and third-party services or Websites, such as social networks (“**Social Features**”). Social Features include features that allow you to click and access the Company’s pages on certain third-party websites, such as Twitter and Discord and from there to “like” or “share” our content on those websites. Use of Social Features may entail a third party’s collection and/or use of your data. If you use Social Features or similar third-party services,

information you post or otherwise make accessible may be publicly displayed by the third-party service you are using. Both the Company and the third party may have access to information about you and your use of both the Website and the third-party service. For more information on third-party websites and platforms, see Section 7.

## **7. THIRD PARTY WEBSITES AND LINKS (INCLUDING WALLET EXTENSIONS)**

Our Website may contain links to other websites or other online platforms operated by third parties. If you follow links to sites not affiliated or controlled by us, you should review their privacy and security policies and other terms and conditions. We do not guarantee and are not responsible for the privacy or security of these sites, including the accuracy, completeness, or reliability of information found on these sites. Information you provide on public or semi-public venues, including information you share on third-party social networking platforms (such as Twitter or Discord) may also be viewable by other users of the Website and/or users of those third-party platforms without limitation as to its use by us or by a third party. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators, except as disclosed on the Any information submitted by you directly to these third parties or use of third-party wallets to conduct transactions on the Website is subject to such third party's privacy policy. We expressly disclaim any and all liability for the actions of third parties, including but without limitation to actions relating to the use and/or disclosure of personal information by third parties or arising from the use of third-party wallets.

## **8. CHILDREN'S PRIVACY**

Children under the age of thirteen (13) are not permitted to use the Website, and we do not seek or knowingly collect any personal information about children under thirteen (13) years of age. If we become aware that we have unknowingly collected information about a child under thirteen (13) years of age, we will make commercially reasonable efforts to delete such information from our database.

If you are the parent or guardian of a child under thirteen (13) years of age who has provided us with their personal information, you may contact us using the information in Section 12 to request that it be deleted.

## **9. DATA SECURITY**

Please note that any information you send to us electronically, while using the Website, or otherwise interacting with us, may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable, and we cannot guarantee "perfect security." Any information you send us through any means is transmitted at your own risk.

Any personal information in our custody and control will be subject to safeguards that are appropriate to the sensitivity and confidentiality of such information. Any third party to whom we disclose your information will be required to implement appropriate protections either through contract, professional obligations (for example, in connection with our auditors, lawyers, and accountants) or otherwise.

We retain your information for as long as is reasonably necessary for the purposes specified in this Privacy Policy. When determining the length of time to retain your information, we consider various criteria, including whether we need the information to continue to provide you with the Website, resolve a dispute, enforce our contractual agreements, prevent harm, promote safety, security and integrity, or protect ourselves, including our rights, property, services, or products

## **10. INTERNATIONAL USERS**

We are based in the United States. The Website is intended for individuals located in the United States and Canada, so if you access the Website from outside the United States, we want to remind you that our handling of information about you will be subject to United States and Canada data privacy laws, as applicable. Your personal information may be hosted in servers located in the United States or in any country in the world. No matter where your personal information resides, the protections in this Privacy Policy shall be applied.

## **11. HOW TO CONTACT US**

Should you have any questions about our privacy practices or this Privacy Policy, please contact us at: [support@roxa.digital](mailto:support@roxa.digital)