

Privacy Notice

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This Privacy Notice is designed to help you understand how 200ms Labs Ltd (“**200ms Labs**,” “**we**,” “**us**,” or “**our**”) collects, uses, processes, and shares your personal information, and to help you understand and exercise your privacy rights.

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1. SCOPE AND UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice applies to personal information processed by us, including on our websites, mobile applications, Backpack browser extensions, and other online or offline offerings. To make this Privacy Policy easier to read, our website, mobile applications, browser extensions and other offerings are collectively called the “**Services**.”

Changes to our Privacy Notice. We may revise this Privacy Notice from time to time in our sole discretion. If there are any material changes to this Privacy Notice, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Notice if you continue to use our Services after the new Privacy Notice takes effect.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- **Wallet Creation.** We may collect personal information when you request a wallet with us, such as your username and public key.
- **Your Communications with Us.** We may collect personal information, such as email address, when you request information about our Services, register for our newsletter, request customer

or technical support, or otherwise communicate with us.

- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging and chat features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Services.

- **Cookie Policy (and Other Technologies).** We, as well as third parties that provide content, advertising, or other functionality on the Services, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect information through your use of the Services.
 - **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects information about engagement on the Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to the Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of the Services, including as part of our analytic practices to help us understand how individuals use the Services (*see Analytics below*);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using the Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;

- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on the Services or on third-party digital properties.

C. Personal Information Collected from Other Sources

Third-Party Services and Sources. We may obtain personal information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect personal information about you from that third-party application that you have made available via your privacy settings.

Referrals and Sharing Features. Our Services may offer various tools and functionalities that allow you to provide personal information about your friends through our referral service. Our referral services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share with us contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or co-worker).

3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfil our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes; and
- Processing your financial information and other payment methods to facilitate purchases and transfers via the Services.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Notice;
- Debugging to identify and repair errors with our Services;

- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content. We may provide you with these materials as permitted by applicable law.

Some of the ways we may market to you include email campaigns, custom audiences advertising, and “interest-based” or “personalized advertising,” including through cross-device tracking.

If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in [“Contact Us”](#) below.

D. With Your Consent

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

E. Other Purposes

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

- **De-identified and Aggregated Information.** We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about the device from which you access our Services, or other analyses we create.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your personal information are described below.

- **Notice Regarding Use of Blockchain Networks.** Information about transactions you enter into via the Services will be recorded on the blockchain and may be accessible to third parties due to the public nature of the blockchain. Because entries to the blockchain are, by their nature, public, and because it may be possible for someone to identify you through your pseudonymous, public wallet address using external sources of information, any transaction you enter onto the blockchain could possibly be used to identify you, or information about you.
- **Other Users of the Services and Parties You Transact With.** Some of your personal information may be visible to other users of the Services (e.g., information featured on generally accessible parts

of the contracts or on a user profile). In addition, to complete transfers via the Services, we will need to share some of your personal information with the party that you are transacting with.

- **Service Providers.** We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Third-Party Services You Share or Interact With.** Certain features and functionalities of the Services may link to or allow you to interface, interact, or share information with, access and/or use third-party websites, services, products, and technology (collectively, “**Third-Party Services**”). Any information shared with or otherwise collected by a Third-Party Service may be subject to the Third-Party Service’s privacy policy. We are not responsible for the processing of personal information by Third-Party Services.
- **Affiliates.** We may share your personal information with our company affiliates.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on the Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.”
- **APIs/SDKs.** We may use third-party application program interfaces (“**APIs**”) and software development kits (“**SDKs**”) as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in “Contact Us” below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Notice. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal information.

By using our Services or providing personal information to us, you agree that we may communicate

with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

6. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Notice for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

7. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. To the extent applicable, you can exercise this right by contacting us at the email address listed in [Contact Us](#) below with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth in [Contact Us](#) below.

8. CHILDREN'S INFORMATION

The Services are not directed to children under 16 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in "[Contact Us](#)" below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account, if applicable.

9. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Supervisory Authority. If your personal information is subject to the applicable data protection laws of the European Economic Area, Switzerland, or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority if you believe our processing of your personal information violates applicable law.

- [EEA Data Protection Authorities \(DPAs\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- [UK Information Commissioner's Office \(ICO\)](#)

10. CONTACT US

200ms Labs is the controller of the personal information we process under this Privacy Notice.

If you have any questions about our privacy practices or this Privacy Notice, or to exercise your rights as detailed in this Privacy Notice, please contact us at:

200ms Labs Ltd.
admin@200ms.io