

Ether.fi Privacy Policy

Last modified: December 27, 2024

This Privacy Policy of Ether.Fi SEZC (“ether.fi,” “us,” “we,” and “our”) describes the information we collect about you when you access our website at ether.fi (the “Site”), enter into agreements with us, use our services and products, send us communications, or otherwise engage with us, and what we do with such information. This policy also describes your rights and how you can exercise them. Any references to ether.fi in this Privacy Policy also refer to its wholly owned subsidiaries. This Privacy Policy covers all of our services and products and all methods by which you may access our Site.

Controller Details

Ether.Fi SEZC,
Strathvale House, 4th Floor, 90
North Church Street George Town,
Grand Cayman, Cayman Islands, KY1 9012

Contact email address: support@ether.fi

Our EU Representative:

Under Article 27 of the GDPR, we have appointed an EU Representative to act as our data protection agent. Our nominated EU Representative is:

Instant EU GDPR Representative Ltd.
Adam Brogden contact@gdprlocal.com
Tel [+35315549700](tel:+35315549700)
INSTANT EU GDPR REPRESENTATIVE LTD
Office 2,
12A Lower Main Street, Lucan Co. Dublin
K78 X5P8
Ireland

Our UK Representative:

Under Article 27 of the UK Data Privacy Act, we have appointed a UK Representative to act as our data protection agent. Our nominated UK Representative is: GDPR Local Ltd.

Adam Brogden contact@gdprlocal.com
Tel [+44 1772 217800](tel:+441772217800)
1st Floor Front Suite
27-29 North Street, Brighton
England

Scope of This Policy

This Privacy Policy applies to all Personal Information collected by our Site or through your use of our products or services, whether through our applications, or otherwise when engaging with us. For the purposes of this Privacy Policy, “Personal Information” means any information that can reasonably be used to identify, relate to, describe, or be associated with a particular individual or household. Personal Information also includes information that may be classified as “Personal Data” or “Personally Identifiable Information” in some jurisdictions. This Privacy Policy does not apply to anonymized or de-identified data that cannot be used to identify you.

Personal Information We Collect

We may collect, store, use, and transfer the following types of Personal Information:

Identity Data such as name, cookie ID, email address, and other identification information (e.g., date of birth, proof of address, where required by law for use of certain products or services).

Transaction Data such as cryptocurrency wallet addresses, information relating to your ether.fi account and cryptocurrency trading and transaction history, including deposits, withdrawals, and where applicable transactions made using our services (e.g., as part of our “Cash” product).

Device Data such as internet protocol (IP) address, device type and model, device keys, device location, web browser type and version, operating system (OS) type and version, device creation/modification/authentication dates, device IDs, device login history.

Purposes and Legal Basis of Collection and Processing of Personal Information

Purpose of Processing	Personal Data	Legal Basis
Providing service for you in accordance with our Terms of Use and other agreements	email address, internet protocol (IP) address, device type and model, device keys, device location, web browser type, cryptocurrency wallet address(es)	necessary for the performance of our contractual obligations
Verify user information, prevent fraud	Internet protocol (IP) address, device type and model, device keys, device location, web browser type, cryptocurrency wallet address(es)	necessary for the performance of our contractual obligations protect the vital interests of the data subject or of another natural person

Ensuring compliance with legal obligations, including Know-Your-Customer (KYC) and Anti-Money Laundering (AML) checks	Identification data, IP address, geolocation, transaction data	compliance with a legal obligation necessary for the performance of our contractual obligations
Personalize our service, associate staking to you	internet protocol (IP) address, device type and model, device keys, device location, web browser type and version, operating system (OS) type and version, device creation/modification/authentication dates, device IDs	necessary for the performance of our contractual obligations
Communicating with you in connection with the use of our service and providing customer support	email address	necessary for the performance of our contractual obligations
To improve our service, enhance customer experience, resolve bugs, errors and other issues that may arise during the operation	internet protocol (IP) address, device type and model, device keys, device location, web browser type and version, operating system (OS) type and version	necessary for the performance of our contractual obligations
For website analytics, data aggregations from the information to improve our service	Cookies, web beacons	your consent for nonessential cookies necessary for the performance of our contractual obligations
Determine general location information (country and region) to safeguard our service and comply with relevant laws and regulations	address, internet protocol (IP) address	protect the vital interests of the data subject or of another natural person compliance with a legal obligation
Conduct anti-money laundering and other legal checks	identification information	compliance with a legal obligation

In some jurisdictions, we may not be able to rely on the above lawful bases. If this is the case, we will seek your consent, and we will rely on that consent as the lawful basis of processing. You can withdraw consent at any time.

How We Collect Personal Information

Direct Interactions. You provide Personal Information when you open an account, use our products and services, subscribe to our updates, request marketing information, participate in a promotion, engage with our social channels, and/or contact us with questions or requests.

Third Party Services. We may receive information about you from our service providers, payment processors, or other partners as part of your use of our products and services (e.g., as part of our “Cash” product, we may receive information about your transactions).

Automated Technologies. When you use our products and services, visit our Site, or interact with our applications, we may collect Personal Information through cookies, web beacons and other technologies (see **Cookies and Similar Technologies**). We may also collect cryptocurrency wallet addresses.

How We Use Your Personal Information

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present our Site, and its contents to you.
- To provide services, including fulfilling transactions.
- To provide you with information that you request from us.
- To fulfill any other purpose for which you provide it.
- To notify you about changes to our Site.
- To allow you to participate in interactive features on our Site.
- To conduct anti-money laundering and other legal checks.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.
- Research and development purposes. We may use Personal Information for testing, research, analysis, product development, and machine learning to improve the user experience. This helps us to make our services more convenient and easier-to-use, enhance the safety and security of our services, and develop new services and features. We may aggregate, de-identify or anonymize your Personal Information for this purpose.
- Marketing. We may use Personal Information to market our services to our users. This includes sending users communications about ether.fi services, features, promotions, studies, surveys, news, updates, and events. We may do so through various methods, including, email, push notifications, in app communications and ads, and ads on third party platforms.

- Legal proceedings and requirements. We may use Personal Information to investigate or address claims or disputes relating to use of our services, to satisfy requirements under applicable laws, regulations, or operating licenses or agreements, or pursuant to legal process or governmental request, including from law enforcement.
- Non-marketing communications. We may use Personal Information to inform you of changes to our terms, services, or policies; or send other communications that aren't for the purpose of marketing the services or products of ether.fi or its partners.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Sharing Your Personal Information

We may disclose aggregated, anonymized information about our users without restriction.

We may disclose Personal Information that we collect, or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
- To our partners to provide our services to you, and who are bound by contractual obligations to keep Personal Information confidential.
- To a buyer or successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of ether.fi assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by ether.fi about our users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of ether.fi, our customers, or others.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

Permanent Information

Interactions with blockchain systems (including smart contract logs and events) may result in the permanent recording of certain information, which cannot be altered or deleted. Blockchain technology operates independently, and ether.fi has no control over its immutability.

Third-Party Websites

We may have links to unaffiliated third-party websites on our Site. These third-party websites have their own privacy policies. We have no involvement with their policies and are not responsible for their practices. You are encouraged to review the privacy policies of all third-party websites you visit.

Personal Information of Minors

Our services and products are not intended for individuals under the age of eighteen (18). We do not knowingly collect and use Personal Information related to minors.

Cookies and Similar Technologies

Cookies are small text files sent from a site to a user's device to store bits of information related to that user or device. First-party cookies are put on your device directly by our Site, which allows us to collect analytical data and provide other useful functions that create a good user experience. Third-party cookies are placed on your device by a third party (e.g., an advertiser or analytic system). The third parties who serve cookies on our site may link your Personal Information to other information they collect.

Certain features of our Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Site. Flash cookies are not managed by the same browser settings as are used for browser cookies.

Pages of our Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We use the following types of cookies:

- Strictly Necessary Cookies allow us to provide basic website functions such as browsing capabilities and secure access.
- Functional Cookies allow us to provide enhanced functionality. For example, we use these cookies to notify you of account updates, notifications, and reminders. You may refuse to accept these cookies; however, this may affect access to certain parts of our Site. Additionally, you may not be able to take advantage of personalized features.
- Performance / Analytics Cookies collect information about how you use our Site, for example, which pages you visited, and which links you clicked. The information collected is aggregated and cannot be used to identify you.

- Marketing Cookies may be set on our Site by our advertising and marketing service providers and partners. They are used to track online activities and help us provide relevant advertising, links, or other information about our services and products to users visiting other websites after visiting our Site.
- Wallet Cookies are generated by the Site or the payment gateways when users perform blockchain-based transactions online. These cookies may store information on certain user characteristics and transaction information. Cookies may also collect wallet addresses.

We may also use automatic data collection technologies to authenticate users remembering user preferences and settings; to determine the popularity of content and measure the effectiveness of advertising campaigns; analyze site traffic and trends, and generally understand the online behaviors and interests of people who interact with our services.

Managing Cookies and Similar Technologies

You can activate or later deactivate the use of cookies through a functionality built into your web browser. If you want to learn more about cookies, or how to control, disable or delete them, please visit <https://www.allaboutcookies.org/> for detailed guidance.

You can opt out of certain web-based targeted advertising by visiting the Digital Advertising Alliance (DAA) for participating companies at <https://optout.aboutads.info/?c=2&lang=EN> , or the Network Advertising Initiative (NAI) for participating companies at <https://optout.networkadvertising.org/?c=1>.

Individuals residing in Canada can visit <https://youradchoices.ca/en/tools> to learn about the DAA's opt out choices. Individuals residing in Europe can learn about opt out choices for web-based targeting advertising by visiting <https://www.youronlinechoices.eu/>.

Security

We use industry-standard security measures to protect your Personal Information from unauthorized access, use, or disclosure. However, the transmission of information via the internet is not completely secure. The safety and security of your Personal Information also depends on you. Please ensure you use strong passwords and protect your account credentials and do not share your password with anyone.

Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Site.

Personal Information Retention

We will retain Personal Information we collect as long as necessary to fulfill the purpose for which it was collected, as outlined in this Privacy Policy, and to the extent permitted by applicable legal requirements. For example, after your account is terminated under our Terms of Use, you will have 30 days to remove your data before we delete your account. Where you request the deletion of your Personal Information or where your account is terminated, we may

continue to retain and use it as permitted or required under applicable laws, for legal, tax, or regulatory reasons, or legitimate and lawful business purposes.

Your Rights Regarding Personal Information

In connection with the accessing, browsing of the Site and using the services, you may have certain rights over your Personal Information in certain circumstances. In some cases, we may ask you to provide us additional evidence and information confirming your identity. These rights may include:

- **Right to Access/Information:** You may request details about the Personal Information we hold about you and details of our processing.
- **Right to Rectification:** If any Personal Information we hold is inaccurate, you may request correction.
- **Right to Erasure (Right to be Forgotten):** You may request the deletion of your Personal Information under certain circumstances.
- **Restriction of Processing:** You may request the restriction of processing under certain circumstances.
- **Objection to Processing:** Under certain circumstances you may object to processing based on legitimate interest or direct marketing. .
- **Right to Data Portability:** You may request a copy of your Personal Information in a structured, machine-readable format.
- **Consent Withdrawal Right:** Where we rely solely on consent for processing your Personal Information, you may withdraw it at any time. In particular, you can change your cookie choices by using our cookie consent tool built in the Site. You can exercise your right to withdraw consent by unsubscribing from our email newsletter.
- **Automated Decision-Making, Profiling:** you have the right to object to decisions based solely on automated processing, including profiling.
- **Opt-outs:** In some circumstances, you may opt out of having your Personal Information shared with third parties.

To exercise these rights, please contact us at support@ether.fi.

If you believe your rights have been violated, you may lodge a complaint with a competent data protection supervisory authority.

Please keep in mind that the use of services based on public blockchains is intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of personal information, in particular when blockchain data is combined with other data. Because

blockchains are decentralized or third-party networks which are not controlled or operated by us, we are not able to erase, modify, or alter personal data from such networks.

International Data Transfer

We may transfer information collected about you, including Personal Information, to affiliated entities, or to other third-party service providers across borders and from your country or jurisdiction to other countries or jurisdictions around the world (all solely for legitimate business purposes). Please note that we may transfer such information to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to such transfer of information..

If you are located in the European Economic Area (“EEA”), the UK, Switzerland, or Brazil, we comply with applicable law to provide an adequate level of data protection for the transfer of your Personal Information to third countries. We enter into the appropriate data processing agreements and, if required, standard contractual clauses for the transfer of data which have been approved by the applicable data protection regulatory authority.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on the Site home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Site and this Privacy Policy to check for any changes.