



Privacy Policy

The Easy Company

Effective date: November 30, 2022

At Easy, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.

Remember that your use of Easy's Services is at all times subject to our [Terms of Use](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

You may print a copy of this Privacy Policy by clicking "Print" in your browser's File menu.

1. What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. "Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage.

2. Personal Data

Personal Data We Collect

We get information about you in a few ways.

Information you give us:

On our wallet product, we collect information that you provide when you create your profile or otherwise interact with the Services. This information may include:

- Profile and identity data, such as your unique username, unique public blockchain address associated with your wallet, and any other content you elect to provide to your profile (e.g. interests, profile photo and other preferences).
- Commercial data, such as details about transactions and purchases made through the Services, and publicly readable transactions and purchase data associated with your public wallet address.
- Payment data, such as public blockchain keys and addresses.
- Social Network Data, such as your username on a social network like Discord or Twitter.

On our *website*, we collect information that you provide, such as when you fill in our online contact form. This information may include:

- Contact information, such as your name and email address.

In addition, we also collect information that you voluntarily provide to us or through the Services, such as when you send us an email, complete a survey, or otherwise contact us.

Information automatically collected:

We may automatically collect information about how you use the Services. This information may include:

- Device data, such as IP address, device ID and type of device/operating system/browser used to access the Services.
- Web analytics, such as browsing history, referring webpage/source through which you accessed the Services, and statistics associated with the interaction between your device or browser and the Services.

Information from Third Parties:

If you provide your social network account credentials (e.g. Discord, Twitter) to us or otherwise sign in to the Services through a third-party site or service on our *wallet product*, some content and/or information in those accounts may be transmitted into your account with us, but you'll be prompted to provide permission.

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Services**
 - Creating and managing your account or other user profiles.
 - Providing you with the products, services or information you request.
 - Meeting or fulfilling the reason you provided the information to us.
 - Providing support and assistance for the Services.
 - Improving the Services, including testing, research, internal analytics and product development.
 - Personalizing the Services, website content and communications based on your preferences.
 - Doing fraud protection, security and debugging.
 - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the "CCPA").
 - Processing orders or other transactions; billing.
- **Corresponding with You**
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Easy or the Services.

- Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
 - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
 - Protecting the rights, property or safety of you, Easy or another party.
 - Enforcing any agreements with you.
 - Responding to claims that any posting or other content violates third-party rights.
 - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

3. How We Share Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include hosting, technology and communication providers.
 - Security and fraud prevention consultants.
 - Support and customer service vendors.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of our Services. Please refer to “Tracking Tools and Opt-out” below for more details.
- **Parties You Authorize, Access or Authenticate.**
 - Third parties you access through the Services, such as a third party service provider that enables your purchases and/or swapping of Digital Assets (see more details in our Terms of Use).
 - Social networks that you elect to connect to the Services.
 - Other users of the Services who you decide to share information with.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

4. Tracking Tools and Opt-Out

Our Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data– usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. Please note that because we use Essential Cookies and Analytics Cookies on our websites, our websites do not support “Do Not Track” requests sent from a browser at this time. We use the following types of Cookies:

- **Essential Cookies.** Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- **Analytics Cookies.** Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. For example, Google LLC (“Google”) uses Cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>. Mixpanel is another example, which we use to better understand your use of our Services. You can find additional information about Mixpanel’s use of your Personal data at <https://mixpanel.com/legal/privacy-policy>.

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <https://www.allaboutcookies.org> or, if you are located in the European Union, <https://ico.org.uk/for-the-public/online/cookies>.

5. Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the

type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

6. Personal Data of Children

As noted in the [Terms of Use](#), we do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at support@easy.me.

7. California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at support@easy.me.

This section discusses the rights afforded to California residents under the California Consumer Privacy Act ("CCPA"). For more information about the personal information we collect about you, how we use this information and who we share this information with, please see Section 2 "Personal Data" above. We will not sell (as defined in the CCPA) your Personal Data, and have not

done so over the last 12 months. To our knowledge, we do not sell the Personal Data of minors under 16 years of age.

Subject to certain exceptions and limitations, the CCPA provides California consumers the right to (1) request certain information about our collection and use of your Personal Data over the past 12 months, (2) request deletion of your Personal Data that we have collected about you, (3) to opt out of sales (as defined in the CCPA), and (4) not be discriminated for exercising these rights.

To exercise the rights described above, you or your authorized agent must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. You may submit a Valid Request to support@easy.me.

8. Other State Law Privacy Rights

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at support@easy.me with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. The Company does not sell Personal Data.

9. European Union and United Kingdom Data Subject Rights

EU and UK Residents

If you are a resident of the European Union ("EU"), United Kingdom ("UK"), Lichtenstein, Norway or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (the "GDPR") with respect to your Personal Data, as outlined below.

For this section, we use the terms "Personal Data" and "processing" as they are defined in the GDPR, but "Personal Data" generally means information that can be used to individually identify a person, and "processing" generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Easy will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at support@easy.me.

Personal Data We Collect

The "Personal Data We Collect" section above details the Personal Data that we collect from you.

Personal Data Use and Processing Grounds

The "Our Commercial or Business Purposes for Collecting Personal Data" section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our "legitimate interests" or the legitimate interest of others, as further described below.

Processing Purpose	Lawful Basis
To form a contractual relationship with you.	We process certain categories of Personal Data as a matter of " contractual necessity ", meaning that we need to process the data to form a contractual relationship with you so that we can

	<p>perform our obligations under our Terms of Use with you and provide you with the Services.</p> <p>Profile data falls under this processing purpose.</p>
<p>To provide, customize, and improve our Services.</p> <p>To communicate with you.</p> <p>To comply with legal requirements and enforce legal terms.</p>	<p>We process certain categories of data to carry out our "legitimate interests", meaning that we believe processing the data will help us provide, customize and improve the Services or respond to your correspondence. We may also process data to meet our legal requirements and enforce legal terms.</p> <p>Profile data, commercial data, payment data, web analytics, and social network data fall under this processing purpose.</p>
<p>With your consent.</p>	<p>In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection, and you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us at support@easy.me.</p>

From time to time we may also need to process Personal Data if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

Sharing Personal Data

The "How We Share Your Personal Data" section above details how we share your Personal Data with third parties.

EU Data Subject Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at support@theeasy.co. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data. You can also access certain of your Personal Data by logging on to your account.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by logging on to your account.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.

- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about Easy's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here:
https://edpb.europa.eu/about-edpb/board/members_en.

Transfers of Personal Data

The Services are hosted and operated in the United States ("U.S.") through Easy and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside and may not protect personal data to the same standard as the GDPR. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Easy in the U.S. and will be hosted on U.S. servers, and you authorize Easy to transfer, store and process your information to and in the U.S., and possibly other countries. You hereby consent to the transfer of your data to the U.S.

10. Changes to this Privacy Policy

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Easy website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

11. Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

Website <https://www.easy.me>

Email support@easy.me

Address 548 Market St
Suite 14531
San Francisco, California 94104-5401