

Fluz Coin

Privacy Policy

Effective Date: June 24, 2026

Version 1.0

Important Notice

This Privacy Policy explains how Fluz Coin Inc. ("we", "our", or "us") collects, uses, shares, and protects your personal information when you use the Fluz Coin mobile application ("App"). Please read this policy carefully before using our App. By using the App, you agree to the practices described in this Privacy Policy.

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1. About This Policy

This Privacy Policy ("Policy") is issued by Fluz Coin Inc. and applies to the Fluz Coin mobile application available on the Apple App Store and Google Play Store. This Policy describes:

- What personal information we collect from you
- How we use your personal information
- With whom we share your personal information
- How we protect your personal information
- Your rights regarding your personal information
- How to contact us with questions or concerns

This Policy applies to all users of the App regardless of location. Where applicable, we also describe specific rights for users in particular jurisdictions, including the European Union, California, and other regions with data protection laws.

2. Data Controller & Contact Information

The data controller responsible for your personal information is:

Category	Details
Company	Fluz Coin Inc.
App Name	Fluz Coin
Website	https://fluzcoin.net
Email	privacy@fluzcoin.net
Effective	June 24, 2026

For all privacy-related inquiries, please contact our Privacy Team at privacy@fluzcoin.net. We aim to respond to all inquiries within 30 days.

3. Information We Collect

We collect several types of information to provide and improve our services. The categories below describe the specific data we may collect.

3.1 Information You Provide Directly

When you register for an account or use certain features of the App, you provide us with information directly, including:

- Full name (first name and last name)
- Email address
- Phone number (including country dial code)

- Country of residence
- Profile information such as your chosen username or nickname
- Preferences and settings you configure in the App
- Communication content when you contact our support team
- Responses to surveys, feedback forms, or promotional activities

3.2 Information Collected Automatically

When you use the App, certain information is collected automatically:

- Device identifiers (Device ID, Advertising ID)
- Device type, model, and operating system version
- App version and installation date
- IP address and approximate geographic location derived from IP
- Log files including access times, features used, and error reports
- Performance data including crash reports and diagnostic information
- Trading activity data including virtual trades opened and closed
- Feature usage patterns and in-app navigation behavior
- Session duration and frequency of App use

3.3 Financial Simulation Data

As a virtual trading simulator, Fluz Coin processes simulated financial activity:

- Virtual portfolio balance and transaction history
- Virtual trades, positions, and profit/loss records
- Simulated watchlists and price alerts
- Risk quiz responses and risk profile classification

Important: Fluz Coin is a simulation platform only. We do not process real money, real investments, or real financial transactions of any kind.

3.4 Information from Third Parties

We may receive information about you from the following third-party sources:

- Analytics providers (AppsFlyer) — campaign attribution and event tracking data
- Market data providers (Binance, Kraken, CoinCap) — cryptocurrency price data used to power the simulation
- App stores (Apple App Store, Google Play Store) — download and purchase data
- Social login providers if you choose to sign in through a third-party service

4. Legal Basis for Processing (GDPR)

For users in the European Economic Area (EEA) and the United Kingdom, we process your personal information based on the following legal grounds under the General Data Protection Regulation (GDPR):

Category	Details
Contractual Necessity	Processing required to provide the App and fulfill our Terms of Service, including account registration and core app functionality.
Legitimate Interests	Processing for our legitimate business interests such as improving the App, preventing fraud, ensuring security, and sending relevant notifications — where these interests do not override your rights.
Consent	Where you have given explicit consent, such as for marketing communications, push notifications, or optional data sharing. You may withdraw consent at any time.
Legal Obligation	Processing required to comply with applicable laws and regulations, including financial regulations, anti-money laundering requirements, and court orders.
Vital Interests	Processing necessary to protect the vital interests of you or another person in emergency situations.

Where we rely on legitimate interests, you have the right to object to such processing. Please see Section 11 (Your Rights) for more details.

5. How We Use Your Information

We use the information we collect for the following purposes:

5.1 Providing and Operating the App

- Creating and managing your user account
- Processing your registration and verifying your identity
- Providing access to virtual trading features and simulations
- Displaying real-time and historical cryptocurrency price data
- Maintaining your virtual portfolio, trade history, and achievements
- Sending transactional notifications relevant to your account

5.2 Improving the App

- Analyzing how users interact with the App to identify and fix bugs
- Understanding which features are most and least used
- Conducting A/B testing to optimize user experience
- Developing new features and improving existing ones
- Monitoring App performance and resolving technical issues

5.3 Communication

- Sending you important account-related notifications
- Responding to your support requests and inquiries

- Informing you about significant updates to the App or Policy
- Sending promotional communications (with your consent where required)
- Providing educational content, tips, and market insights

5.4 Safety and Security

- Detecting, preventing, and investigating fraudulent activity
- Protecting the security and integrity of our systems and data
- Verifying compliance with our Terms of Service
- Responding to legal requests and preventing harm

5.5 Analytics and Attribution

- Measuring the effectiveness of marketing campaigns through AppsFlyer
- Understanding user acquisition channels and traffic sources
- Generating aggregate, anonymized usage statistics
- Improving App store listings and descriptions

6. Sharing Your Information

We do not sell, rent, or trade your personal information to third parties for their own marketing purposes. We may share your information in the following limited circumstances:

6.1 Service Providers

We share information with trusted third-party service providers who assist us in operating the App, including:

- Analytics and attribution: AppsFlyer (mobile analytics and marketing attribution)
- Market data: Binance, Kraken, and CoinCap APIs (cryptocurrency price feeds)
- Cloud infrastructure: Hosting and data storage providers
- Customer support: Tools used to manage and respond to support requests
- Communications: Email and notification delivery services

All service providers are contractually obligated to use your information only to provide services to us and to protect your information in accordance with this Policy and applicable law.

6.2 CRM and Lead Management

When you register, your registration information may be submitted to our CRM partner (Trackbox) as part of our user acquisition and customer relationship management system. This data is used to manage your account and may be used for regulatory compliance purposes. This is disclosed here in the interest of full transparency.

6.3 Legal Requirements

We may disclose your information when required by law or when we believe disclosure is necessary to:

- Comply with a legal obligation, court order, or government request
- Protect the rights, property, or safety of our company, users, or others

- Prevent or investigate fraud, security breaches, or illegal activity
- Enforce our Terms of Service or other agreements

6.4 Business Transfers

If we are involved in a merger, acquisition, asset sale, or similar business transaction, your personal information may be transferred as part of that transaction. We will notify you before your information is transferred and becomes subject to a different Privacy Policy.

6.5 Aggregate Data

We may share aggregated or de-identified information that cannot reasonably be used to identify you. For example, we may publish statistics about overall app usage or trading patterns without including any personally identifiable information.

7. Data Retention

We retain your personal information for as long as necessary to fulfill the purposes described in this Policy, unless a longer retention period is required or permitted by law.

Category	Details
Account Data	Retained for the duration of your account plus 3 years after account deletion, or as required by law.
Trading Activity Data	Retained for 5 years to comply with potential financial regulatory requirements.
Log and Usage Data	Typically retained for 12 months for operational and security purposes.
Communication Records	Support communications retained for 3 years after the matter is resolved.
Analytics Data	Aggregated analytics data may be retained indefinitely; identifiable data retained per analytics provider policies.
Legal Hold Data	Data subject to litigation hold or legal obligation may be retained longer as required.

When your data is no longer needed, we securely delete or anonymize it in accordance with our data retention procedures. You may request earlier deletion of your personal data subject to our legal obligations — see Section 11 (Your Rights).

8. Data Security

We implement appropriate technical and organizational security measures to protect your personal information against unauthorized access, alteration, disclosure, or destruction. Our security practices include:

8.1 Technical Measures

- Encryption of data in transit using TLS 1.2 or higher
- Encryption of sensitive data at rest
- Secure API authentication using bearer tokens
- Regular security assessments and penetration testing
- Automated monitoring for suspicious activity and potential breaches
- Secure coding practices and regular dependency updates

8.2 Organizational Measures

- Access controls limiting data access to authorized personnel only
- Staff training on data protection and security best practices
- Vendor security assessments before engaging third-party processors
- Incident response procedures for data breaches
- Regular review and updating of security policies

8.3 Breach Notification

In the event of a data breach that is likely to result in a risk to your rights and freedoms, we will notify the relevant supervisory authority within 72 hours where required. We will notify affected users without undue delay where the breach is likely to result in a high risk to their rights and freedoms.

Security Limitation

While we strive to protect your information, no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security, and you use the App at your own risk. If you believe your account security has been compromised, please contact us immediately at privacy@fluzcoin.net

9. Tracking Technologies

We and our third-party partners use various tracking technologies in the App to collect information automatically.

9.1 Mobile Identifiers

We use mobile device identifiers including:

- Advertising Identifier (IDFA on iOS, GAID on Android) — for attribution and analytics
- Device Identifier — for fraud prevention and security

You can reset your advertising identifier or opt out of interest-based advertising through your device settings. On iOS, go to Settings > Privacy > Tracking. On Android, go to Settings > Google > Ads.

9.2 Analytics SDK

We integrate the AppsFlyer SDK to help us understand how users discover and interact with the App. AppsFlyer may collect device information, IP address, and usage events. For more information about

AppsFlyer's data practices, please visit their privacy policy at <https://www.appsflyer.com/legal/privacy-policy/>.

9.3 Opting Out

You may opt out of certain tracking by:

- Enabling "Limit Ad Tracking" or "Opt out of Ads Personalization" in device settings
- Resetting your device's advertising identifier
- Contacting us at privacy@fluzcoin.net to opt out of specific data collection

10. Children's Privacy

Age Restriction

Fluz Coin is not intended for children under the age of 18. We do not knowingly collect personal information from children under 18. If you are under 18 years of age, please do not use the App or provide any personal information.

If we become aware that we have collected personal information from a child under 18 without parental consent, we will take steps to delete such information as quickly as possible. If you believe we may have collected information from a child under 18, please contact us immediately at privacy@fluzcoin.net.

For users in the United States, the App complies with the Children's Online Privacy Protection Act (COPPA). For users in the European Union, we comply with applicable laws protecting children's personal data.

11. Your Privacy Rights

Depending on where you live, you may have certain rights regarding your personal information. We honor these rights to the extent required by applicable law.

11.1 Rights Available to All Users

- Right to Access: Request a copy of the personal information we hold about you
- Right to Correction: Request that we correct inaccurate or incomplete information
- Right to Deletion: Request that we delete your personal information (subject to legal obligations)
- Right to Opt-Out: Opt out of marketing communications at any time
- Right to Complaint: File a complaint with your local data protection authority

11.2 Additional Rights for EEA/UK Users (GDPR)

- Right to Restriction: Request that we restrict processing of your data
- Right to Portability: Receive your data in a structured, machine-readable format
- Right to Object: Object to processing based on legitimate interests or for direct marketing

- Rights Related to Automated Decision-Making: Not to be subject to solely automated decisions with legal or significant effects

EEA/UK users also have the right to lodge a complaint with their national data protection authority. A list of EEA authorities is available at https://edpb.europa.eu/about-edpb/about-edpb/members_en.

11.3 California Privacy Rights (CCPA/CPRA)

California residents have additional rights under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA):

- Right to Know: Know what personal information is collected, used, shared, or sold
- Right to Delete: Request deletion of your personal information
- Right to Opt-Out: Opt out of the sale or sharing of personal information. Note: We do not sell personal information.
- Right to Non-Discrimination: Not receive discriminatory treatment for exercising your privacy rights
- Right to Correct: Correct inaccurate personal information
- Right to Limit Use of Sensitive Personal Information: Limit use of sensitive personal information

11.4 How to Exercise Your Rights

To exercise any of your rights, please contact us at:

- Email: privacy@fluzcoin.net
- Website: <https://fluzcoin.net/privacy>

We will respond to your request within 30 days (or within the timeframe required by applicable law). We may need to verify your identity before processing your request. We will not charge a fee for reasonable requests.

12. International Data Transfers

Your personal information may be transferred to and processed in countries other than your country of residence. These countries may have different data protection laws than your country.

When we transfer personal information from the EEA or UK to countries that do not have an adequacy decision from the European Commission, we use appropriate safeguards, including:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- Data processing agreements with service providers that include appropriate protections
- Other legally recognized transfer mechanisms

By using the App, you acknowledge that your information may be transferred internationally as described in this Policy. If you have questions about international transfers, please contact us at privacy@fluzcoin.net.

13. Third-Party Services and Links

The App may contain links to third-party websites, services, or content that are not operated by us. This Privacy Policy does not apply to those third-party services. Third-party services referenced in the App include:

- Cryptocurrency exchanges and market data providers (Binance, Kraken, CoinCap)
- News sources and cryptocurrency publications linked from the news feed
- Educational resources and external websites linked from blog content
- AppsFlyer analytics and attribution platform

We encourage you to review the privacy policies of any third-party services you use. We are not responsible for the privacy practices or content of third-party services.

14. Push Notifications and Communications

14.1 Push Notifications

With your permission, we may send push notifications to your device to provide:

- Price alerts for cryptocurrencies you are monitoring
- Trading signals and market updates
- Achievement unlocks and gamification events
- App updates and important announcements
- New blog content and educational material

You can control push notifications through your device settings (iOS: Settings > Notifications > Fluz Coin; Android: Settings > Apps > Fluz Coin > Notifications) or through the App's notification settings.

14.2 Email Communications

We may send you emails regarding:

- Account registration confirmation and welcome messages
- Important updates to our terms, policies, or the App
- Security notifications and alerts
- Marketing and promotional content (only with your consent)

You can unsubscribe from marketing emails at any time using the unsubscribe link included in each email. Transactional and security emails cannot be unsubscribed as they are necessary for account operation.

15. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or for other operational reasons. When we make material changes, we will:

- Update the "Effective Date" at the top of this Policy
- Notify you through a prominent in-app notice
- Send an email notification to your registered email address for significant changes
- In some cases, seek your affirmative consent to the updated Policy

We encourage you to review this Policy periodically to stay informed about how we protect your information. Your continued use of the App after changes become effective constitutes your acceptance of the updated Policy.

16. Region-Specific Disclosures

16.1 European Union and European Economic Area

If you are located in the EU/EEA, the GDPR applies to our processing of your personal data. The legal bases for our processing activities are described in Section 4 of this Policy. You have the right to lodge a complaint with your local supervisory authority if you believe we have not complied with the GDPR.

16.2 United Kingdom

If you are located in the United Kingdom, the UK GDPR and Data Protection Act 2018 apply. Our processing activities are governed by the same principles described for EEA users. You have the right to lodge a complaint with the Information Commissioner's Office (ICO) at <https://ico.org.uk/>.

16.3 California

California residents have rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA). Please see Section 11.3 for a description of these rights. We do not sell personal information and have not done so in the preceding 12 months.

16.4 Brazil

If you are located in Brazil, the Lei Geral de Proteção de Dados (LGPD) may apply to our processing of your personal data. You have similar rights to those described in Section 11, including the right to access, correct, delete, and port your data. You may also lodge a complaint with the Autoridade Nacional de Proteção de Dados (ANPD).

17. Glossary of Terms

Category	Details
Personal Information	Any information that identifies or can be used to identify a natural person directly or indirectly.
Data Controller	The entity that determines the purposes and means of processing personal data. Fluz Coin Inc. is the data controller for the App.
Data Processor	An entity that processes personal data on behalf of a data controller, subject to the controller's instructions.
Processing	Any operation performed on personal data, including collection, storage, use, disclosure, erasure, or destruction.
GDPR	General Data Protection Regulation (EU) 2016/679 — the primary data protection law in the European Union.
CCPA/CPRA	California Consumer Privacy Act / California Privacy Rights Act — California state data protection laws.
SDK	Software Development Kit — a set of tools integrated into the App to provide specific functionality.

Attribution	The process of determining which marketing campaign or source led a user to download and install the App.
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18. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact us:

Privacy Contact

Email: privacy@fluzcoin.net Website: <https://fluzcoin.net> Company: Fluz Coin Inc. For data protection inquiries from EEA/UK residents, please indicate your country and the specific right or concern you are raising. We will respond within 30 days.

We are committed to working with you to resolve any concerns about your privacy. If you are not satisfied with our response, you have the right to lodge a complaint with your local data protection supervisory authority.

This Privacy Policy was last updated on June 24, 2026.

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