

Toffee Wallet Privacy Policy

Last Updated: August 25th 2025

Please review this Privacy Policy regularly, as it may be updated from time to time. Any changes will be effective immediately upon posting on our website or app.

Overview

Galactica Games Inc. dba **Toffee Wallet** (the “Company”) respects your privacy and is committed to protecting personal and nonpublic personal information, in accordance with relevant privacy laws. This Policy explains how information is collected, used, shared, and safeguarded.

The Company complies with applicable privacy and data protection laws in the jurisdictions where we operate. These include, where relevant:

- ❖ The European Union General Data Protection Regulation (EU GDPR) and the UK GDPR/Data Protection Act 2018;
- ❖ The Gramm-Leach-Bliley Act (GLBA), the Right to Financial Privacy Act (RFPA), the Children’s Online Privacy Protection Act (COPPA), the California Consumer Privacy Act (CCPA), and the Controlling the Assault of Non-Solicited Pornography and Marketing Act (CAN-SPAM) in the United States;
- ❖ The Personal Information Protection and Electronic Documents Act (PIPEDA) in Canada; and
- ❖ Other applicable regional and national privacy laws.

This Policy is designed to reflect the highest standards of global privacy regulation, including principles of fairness, transparency, purpose limitation, data minimization, security, and individual rights. Depending on your location, you may have specific legal rights regarding your personal information, which are outlined below.

CAN-SPAM Policy Requirements

The Company complies with all CAN-SPAM requirements when sending commercial email. This includes:

- using accurate “From”, “To”, and routing information.
- Ensuring subject lines are not deceptive or misleading.
- Clearly identifying commercial email as an advertisement or promotion.
- Including a valid physical address.
- Providing clear and easy opt-out instructions in every message, honored within 10 business days.

- Prohibiting the transfer of opt-out recipient emails addresses, except to ensure CAN-SPAM compliance.

GLBA Privacy Policies (if applicable)

The Company complies with the Gramm-Leach-Bliley Act (GLBA) Privacy Rules, which require financial institutions to safeguard consumer information and provide privacy notices.

- Information Sharing

- We may share customer information with affiliates, service providers and payment processors to carry out daily operations (such as, ID verification, transaction processing, reward facilitation, etc.). We may also share information when required by law.

- Opt-Out Rights

- Customers will be given opt-out opportunities where required, such as when sharing beyond operational business needs or with affiliates for marketing.

- Notices to Consumers

- GLBA privacy notices are provided when a customer relationship is established and annually thereafter, outlining categories of information collected, disclosed, and customer rights.

- Restrictions

- The Company will not disclose account numbers or similar identifiers to non-affiliated third parties for marketing purposes.

RFPA Policy Requirements

The Company complies with the Right to Financial Privacy Act (RFPA). Federal authorities may only access customer financial information with:

- a valid subpoena, warrant, or customer consent, or
- Other exceptions permitted by law.

We may be required by court order to delay notifying a customer for up to 90 days if disclosure would jeopardize an investigation.

COPPA Policy Requirements

The Company does not knowingly collect data from children under 13. If services are ever directed to children under 13, we will comply with COPPA by:

- Posting clear privacy notices.
- Obtaining verifiable parental consent before collecting data.

- Allowing parents to review or delete their child's information.
- Limiting data collection to what is reasonably necessary for participation
- Implementing strict security safeguards for children's data.

Your Privacy Rights

Depending on where you live, you may have certain legal rights with respect to your personal information. The Company respects and honors these rights where applicable. They may include:

- **Right of Access:** To request a copy of the personal information we hold about you.
- **Right of Correction/Rectification:** To correct inaccurate or incomplete personal information.
- **Right of Erasure** ("Right to be Forgotten"): To request deletion of your personal information, subject to legal exceptions.
- **Right to Restrict Processing:** To request that we limit how we use your personal information.
- **Right to Data Portability:** To request that we transfer your information to another service provider in a structured, commonly used format.
- **Right to Object:** To object to processing of your personal information in certain circumstances, including direct marketing.
- **Right to Withdraw Consent:** Where processing is based on consent, you may withdraw it at any time.
- **Right to Limit Use of Sensitive Data:** In some jurisdictions, you may limit how sensitive information is used.
- **Right to Opt-Out of Sale or Sharing:** In jurisdictions such as California, you may opt-out of the sale or sharing of your personal information.
- **Right to Non-Discrimination:** You will not be discriminated against for exercising your privacy rights.

How to Exercise Your Rights

We provide clear instructions and, where required, online portals to help you exercise your rights. Requests will be subject to verification to protect your identity. We will respond within the timelines required by law.

Local Rights

You may have additional rights depending on the laws of your country or region. We will comply with such rights to the extent required by applicable law.

These rights may not be absolute and can be subject to limitations under applicable law.

Information Use & Sharing

The Company may share information only in the following circumstances:

- With affiliates or service providers to deliver services.
- To process payments, verify transactions or facilitate rewards programs..
- To detect, prevent, or investigate fraud, unauthorised transactions or to resolve disputes.
- When required by law, regulations, or judicial process.
- With government or regulatory authorities for compliance reasons.

We do not disclose account numbers or similar sensitive identifiers to non-affiliated entities for marketing. We do not sell personal information.

Data Security & Confidentiality

The Company safeguards all customer information through secure systems, encryption, and strict access protocols.

- Employee access to personal information is limited to those with a business need.
- Employees are trained annually on confidentiality obligations.
- Violations of privacy or security requirements may result in disciplinary action, up to and including termination.

Record Retention

The Company retains data and records related to privacy and marketing in compliance with applicable laws.

- For example, the CCPA requires us to maintain records of consumer requests and our responses for at least two years, and GDPR requires documentation of processing activities.
- Marketing and advertising records are retained as required under applicable law.

Monitoring, Training & Updates

- Monitoring: The Company conducts annual independent reviews to ensure privacy compliance.
- Training: All employees complete privacy training each year.
- Policy Updates: This Policy is reviewed and updated periodically to reflect changes in

applicable global privacy laws. Updates will be posted with a revised “Last Updated” date, and customers are encouraged to regularly review this Privacy Policy.