

*Last Updated: May 17, 2024*

xLabs (the “**Company**,” “**we**,” “**us**,” or “**our**”) is committed to protecting your privacy. It is our policy to respect your privacy and comply with any applicable laws and regulations regarding any personal information we may collect about you, including across our website, portalbridge.com, and other sites we own and operate (collectively, the “**Platform**”). This Privacy Policy (the “**Policy**”) outlines the data collection, processing, and management practices of the Company in relation to services provided on the Platform (the “**Services**”). By using our Platform, you agree to the collection, use, and disclosure of your personal information in accordance with this Policy.

In the event our Platform contains links to third-party sites and services, please be aware that those sites and services have their own privacy policies. After following a link to any third-party content, you should read their posted privacy policy information about how they collect and use personal information. This Privacy Policy does not apply to any of your activities after you leave our Platform.

## **I. INFORMATION WE COLLECT**

### **A. Information About You That You Share With Us Directly**

When you use Services on the Platform you may give us personal information directly (for example, details you connect your wallet to the Platform), and we will store that personal information on our systems and process it for the purposes described in this Privacy Policy.

Depending on the Service, the personal information we collect will be relevant to providing that Service and include some or all of the following non-personally identifiable data:

- Your public blockchain wallet address;
- Amount of any asset involved in a transaction; and
- Any additional information required for verification or participation in the Service offered.

We may also collect personal information from you when you communicate with us, such as your name, email address, and any other information you voluntarily provide.

### **B. Information You Generate Using Our Services**

Information you generate while using our Services may be retained to protect the safety and well-being of our users; to protect our rights and property in connection with our Services; to conduct research; to operate, improve, personalize, and optimize our Services and our users’ experiences, including through the use of analytics; and to manage and deliver advertising. Where required by law, we will seek your consent for this.

### **C. Cookies and Other Automated Information Collection**

We use cookies and other similar technologies (e.g., beacons, pixel tags, clear gifs, and device identifiers). We, our service providers, and our business partners

use these cookies and other similar technologies to process information, which may include:

- IP address;
- the type of computer or mobile device you are using;
- platform type (like Apple iOS or Android);
- your operating system version;
- the screen resolution of your monitor(s);
- your mobile device's identifiers, like your MAC Address, Apple Identifier For Advertising (IDFA), and/or Android Advertising ID (AAID);
- application performance and de-bugging information;
- your browser type and language;
- referring and exit pages, and URLs;
- the number of clicks on an app feature or web page;
- the amount of time spent on an app feature or web page;
- domain names;
- landing pages;
- pages viewed and the order of those pages; and/or
- what your current progress is in our Services and the date and time of activity.

## **II. PROCESSING AND USE OF YOUR PERSONAL INFORMATION**

We only collect and use your personal information when we have a legitimate reason for doing so. Most commonly, we will use your personal data in the following circumstances:

- Provide our Services and create accounts in those Services
- Monitor and maintain the security and integrity of our Platform
- Improve, optimize and personalize our Services and our user's experiences
- Communicate with you about the Services you are using
- Customer service and managing user communications, including technical support
- Protect the safety and well-being of our users and others
- Where you provide sensitive or special category personal information to us
- Maintain our business operations, including any business transition, like a merger, acquisition by another company, or sale of all or part of our assets
- For security purposes and to prevent fraud or potentially illegal activities, and to enforce the applicable Terms of Service
- Cooperate with public authorities and law enforcement where lawfully permitted or required
- Protect our rights, including compliance with applicable legal obligations, resolving any disputes we may have, and to administer our agreements with third parties

## **III. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES**

We share your personal data with our third-party service providers, agents, subcontractors and other associated organizations, our group companies, and affiliates (as described below) in order to complete tasks and provide the Platform and Services to you

on our behalf. When using third party service providers, they are required to respect the security of your personal data and to treat it in accordance with the law.

We may disclose personal information to:

- a parent, subsidiary, or affiliate of the Company
- third-party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, hosting and server providers, analytics, error loggers, debt collectors, maintenance or problem-solving providers, professional advisors, and payment systems operators
- our employees, contractors, and/or related entities
- our existing or potential agents or business partners
- credit reporting agencies, courts, tribunals, and regulatory authorities, in the event you fail to pay for goods or services we have provided to you
- courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise, or defend our legal rights
- third parties, including agents or sub-contractors, who assist us in providing information, products, or services
- third parties to collect and process data
- an entity that buys, or to which we transfer all or substantially all of our assets and business

#### **IV. SECURITY OF YOUR PERSONAL INFORMATION**

We implement reasonable and appropriate security measures to help protect the security of your information both online and offline and to ensure that your data is treated securely and in accordance with this Privacy Policy. These measures vary based upon the sensitivity of your information. It is important that you protect and maintain the security of your personal information, including the secure storage of any keys or other wallet data used to access your crypto assets.

While we take precautions against possible security breaches of our Services and our customer databases and records, no website or Internet transmission is completely secure. We cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur, and we cannot guarantee the security of your information while it is being transmitted to our Service. Any transmission is at your own risk.

#### **V. HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

How long we retain your personal information depends on why we collected it and how we use it, but we will not retain your personal information for longer than is necessary to provide you with the Services or for our legal requirements.

We will retain personal information that is connected with your account and/or the Services you use from us for as long as you are actively using Services on the Platform. However, you acknowledge that we may retain some information after you have ceased to use the Platform's Services where necessary to enable us to meet our legal obligations or to exercise, defend, or establish our rights.

## VI. YOUR RIGHTS AND CONTROLLING YOUR PERSONAL INFORMATION

**Your choice:** By providing personal information to us, you understand we will collect, hold, use, and disclose your personal information in accordance with this Privacy Policy. You may choose to reject cookies and certain other tracking technologies by changing the setting of your browser. You do not have to provide personal information to us, however, if you do not, it may affect your use of our Platform or the products and/or services offered on or through it. You may also request details of the personal information that we hold about you.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Marketing permission and Unsubscribing:** If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by opting out of the promotional communications or contacting us using the details below. To unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details provided in this privacy policy or opt-out using the opt-out facilities provided in the communication. We may need to request specific information from you to help us confirm your identity.

**Correction:** If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us using the details provided in this privacy policy. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading, or out of date.

**Non-discrimination:** We will not discriminate against you for exercising any of your rights over your personal information. Unless your personal information is required to provide you with a particular service or offer (for example providing user support), we will not deny you goods or services and/or charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties, or provide you with a different level or quality of goods or services.

**Notification of data breaches:** We will comply with laws applicable to us in respect of any data breach.

**Complaints:** If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact a regulatory body or data protection authority in relation to your complaint.

**No fee usually required:** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is manifestly unfounded or excessive. Alternatively, we could refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal

data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Period for replying to a legitimate request:** We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Notwithstanding the above, we cannot edit or delete any information that is stored on a blockchain as we do not have custody or control over any blockchains. The information stored on the blockchain may include purchases, sales, and transfers related to any blockchain address associated with you.

## **VII. CHILDREN’S PRIVACY**

The Platform is not directed to children under 18 (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 Platform without your consent, you may contact us. 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.

## **VIII. BUSINESS TRANSFERS**

If we or our assets are acquired, or in the unlikely event that we go out of business or enter bankruptcy, we would include data, including your personal information, among the assets transferred to any parties who acquire us. You acknowledge that such transfers may occur, and that any parties who acquire us may, to the extent permitted by applicable law, continue to use your personal information according to this Privacy Policy, which they will be required to assume as it is the basis for any ownership or use rights we have over such information.

## **IX. INTERNATIONAL TRANSFERS**

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States, members of the European Union, or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

## **X. LIMITS OF OUR POLICY**

Our Platform may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites and cannot accept responsibility or liability for their respective privacy practices.

## **XI. CHANGES TO THIS POLICY**

At our discretion, we may change this Privacy Policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this Policy, we will post the changes here at the same link by which you are accessing this Policy, and if the changes are significant, or if required by applicable law, we will contact you (based on your selected preferences for communications from us) with details of the changes.

If required by law, we will get your permission or give you the opportunity to opt in to or opt out of, as applicable, any new uses of your personal information.

## **XII. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS**

This Supplemental Notice for California Residents only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (the “CCPA”). The CCPA provides California residents with the right to know what categories of personal information we have collected about them, and whether we disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information by visiting: <https://www.oag.ca.gov/privacy/ccpa>.

## **XIII. 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. You can exercise this right by contacting us with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account.

## **XIV. YOUR RIGHTS AS A DATA SUBJECT (GDPR)**

You have certain rights under applicable legislation, and in particular under Regulation EU 2016/679 (General Data Protection Regulation or ‘GDPR’). You can find out more about the GDPR and your rights by accessing the European Commission’s website.

## **XV. CONTACT US FOR QUESTIONS AND REPORTING VIOLATIONS**

If you have any questions, concerns, or complaints about our Privacy Policy or our data collection and processing practices, or if you want to report any security violations to us, or exercise any of your rights under this Privacy Policy, please contact us at the following address: