

Data Privacy Policy for Prizrak Platform

Version from: 16 January 2026

This privacy policy ("Privacy Policy") explains who we are, how we process (i.e. collect, record, organize, structure, store, adapt or alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combine, restrict, erase or destroy) Personal Data about users, and how users can exercise their privacy rights.

We are Prizrak ("we", "our" or "us"), the provider of a decentralized analytical and infrastructure platform for crypto traders and investors, operated by us through the website www.prizrak.ai (the "Website"). Any information provided on the Website is for informational and/or indicative purposes only and shall under no circumstances be considered legal or financial advice.

This Privacy Policy applies to Personal Data that we collect and process through the Website.

By accessing and using the Website, or otherwise providing us with Personal Data (for example, when contacting our support services), users confirm that they have read and understood how we collect, process, use, and disclose Personal Data as described in this Privacy Policy. By accessing and using the Website, users agree to be bound by this Privacy Policy and consent to the processing of their Personal Data as specified herein.

This Privacy Policy applies to all visitors, users, and others who access or use the Website ("Users").

For the purposes of applicable data protection laws, Prizrak acts as the Data Controller.

Our data protection contact may be reached at: privacy@prizrak.ai

With respect to Users located in the European Economic Area ("EEA"), we collect and process Personal Data in accordance with all applicable EU data protection laws and regulations, including, without limitation, the General Data Protection Regulation (EU) 2016/679 of 27 April 2016 ("GDPR"), applicable as of 25 May 2018.

1. General

The privacy and security of Users' Personal Data are important to us. We take appropriate technical and organizational measures to ensure that Personal Data is processed lawfully, fairly, and transparently, in accordance with applicable data protection laws and based on one or more lawful processing grounds.

We retain Personal Data only for as long as is necessary to fulfill the purposes outlined in this Privacy Policy. In certain cases, data may be retained for longer periods where required by applicable law or legitimate interests, provided that such data is appropriately safeguarded and, where possible, anonymized.

To provide and improve the services available through the Website, we may share limited Personal Data with entities that are directly or indirectly affiliated with the Prizrak project. We do not sell, rent, or otherwise disclose Users' Personal Data to unrelated third parties.

Personal Data may be transferred outside of the EEA where necessary. In such cases, we ensure that appropriate safeguards are implemented in accordance with applicable data

protection laws.

Users are encouraged to review this Privacy Policy periodically, as it may be updated from time to time to reflect legal, technical, or operational changes.

The Website may contain links to third-party websites or services, including those operated by partners, advertisers, affiliates, or external providers. Such third-party websites operate under their own privacy policies, and Prizrak assumes no responsibility or liability for their content or data protection practices. Users should review the relevant privacy policies before providing any Personal Data to third-party websites or services.

2. Definitions

Personal Data

Any information that directly or indirectly, or in combination with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through the Website (or through third-party services used in connection with the Website), which may include: IP addresses or domain names of devices used by Users, URI (Uniform Resource Identifier) addresses, date and time of requests, request methods used to submit requests to the server, size of files received in response, numerical codes indicating server response status (e.g. success, error), country of origin, browser type and version, operating system, time spent on individual pages, navigation paths within the Website (including page sequences), and other parameters related to the User's device, operating system, or IT environment.

Data Subject

The natural person to whom the Personal Data relates.

Data Processor

A natural or legal person, public authority, agency, or other body that processes Personal Data on behalf of the Data Controller, as described in this Privacy Policy.

Data Controller

The natural or legal person, public authority, agency, or other body that, alone or jointly with others, determines the purposes and means of processing Personal Data, including security measures related to the operation and use of the Website.

Service

The services provided through the Website, as described in applicable terms and on the Website.

Cookies

Small data files stored on the User's device.

3. Data We Collect About Users

The Website may collect various types of Personal Data, either directly or through third-party services (for example, social media platforms or analytics providers). Such

Personal Data may include: email address, Cookies, Usage Data, username, country, first name, profession, profile image, city, and other information voluntarily provided by the User.

Detailed information about each type of Personal Data collected is provided in the relevant sections of this Privacy Policy or through specific notices displayed prior to the collection of such data.

We do not knowingly request or intend to collect any special categories of Personal Data, including Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data used for unique identification, health-related data, or data concerning a natural person's sex life or sexual orientation. Users are advised to exercise caution when sharing such information voluntarily.

Personal Data may be provided voluntarily by the User or, in the case of Usage Data, collected automatically when using the Website.

Unless expressly stated otherwise, all Personal Data requested by the Website is required to provide the relevant services. Failure to provide such Personal Data may result in the inability to access or use certain features of the Website. Where Personal Data is indicated as optional, Users may choose not to provide it without affecting the availability or functionality of the Service.

Users who are uncertain about which Personal Data is mandatory may contact us for clarification.

The use of Cookies or other tracking technologies by the Website or by third-party services used by the Website is intended to provide and improve the Service requested by the User, as described in this Privacy Policy and in the applicable Cookies Policy.

Users are responsible for any Personal Data of third parties that they submit, publish, or share through the Website and confirm that they have obtained all necessary consents to provide such data.

Certain features of the Website may allow or require Users to voluntarily provide additional Personal Data.

In this respect, we may collect and process the following categories of Personal Data:
Personal Data Provided by Users

We collect Personal Data that Users voluntarily provide when interacting with the Website's functionalities, including, for example, when Users register or subscribe to the Website or otherwise communicate with us. Such Personal Data may include:

User's name and email address;

any data or information Users submit through forms or other interactive features of the Website;

any information Users submit to our support team via email or other communication channels.

4. Cookies

The Website uses Cookies. Cookies are small text files that are stored in the User's internet browser or on the User's device when accessing the Website. When the Website is accessed, a cookie may be stored on the User's operating system. Cookies contain a unique string that enables recognition of the browser when the Website is visited again; however, this does not mean that we can directly identify the User.

Cookies are used to improve the usability and functionality of the Website. For example, we use session Cookies to recognize that Users have already visited certain pages of the Website. Session Cookies are automatically deleted when Users leave the Website.

Cookies are stored on the User's device and transmitted to us by the User's browser. Users therefore have full control over the use of Cookies. Users may disable or restrict Cookies by adjusting their browser settings. Cookies that have already been stored may be deleted at any time, including automatically. If Cookies are disabled, certain features of the Website may not function properly or may be unavailable.

For more information and a detailed explanation of Cookies used on the Website, Users may review our Cookies Policy.

5. Recipients of Personal Data

Personal Data collected through the Website or in connection with customer support services is stored on secure servers protected by appropriate technical and organizational safeguards.

Access to Users' Personal Data is generally restricted to authorized personnel responsible for operating and maintaining the Website.

To provide Users with high-quality services, we may transfer limited Personal Data to entities that are directly or indirectly affiliated with the Prizrak project and that process Personal Data on our behalf. Such entities are contractually bound to process Personal Data confidentially and solely for purposes related to the provision and improvement of the Website and its services.

We do not disclose Users' Personal Data to unrelated third parties. Where disclosure to third parties is necessary, the scope of Personal Data shared is limited to the minimum required for the specific purpose.

Personal Data may also be disclosed to third parties where required or permitted by applicable law, regulatory requirements, official requests, or court orders, or where Users have provided their explicit consent.

6. Methods of Processing Personal Data

We implement appropriate technical and organizational security measures to protect Personal Data against unauthorized access, disclosure, alteration, or destruction.

Personal Data is processed using computers and IT-enabled tools in accordance with organizational procedures strictly related to the purposes described in this Privacy Policy.

In addition to us, Personal Data may be accessible, where necessary, to authorized personnel involved in the operation of the Website, including administration, support, legal, marketing, and system administration staff, as well as to external service providers (such as hosting providers, IT service providers, communication service providers) appointed as Data Processors. An updated list of such Data Processors may be requested

at any time.

7. Purposes of Personal Data Processing

We use the information collected about Users to provide and operate the services offered through the Website and to conduct our business activities. Personal Data is also used to improve and develop our services, enhance security, perform analytics and research, ensure a high-quality user experience, promote our services, prevent fraud, and comply with applicable legal obligations.

Specifically, we collect and process Users' Personal Data for the following purposes:

a) Delivering and Improving the Service

We use Users' Personal Data to develop, deliver, operate, and improve the services provided through the Website, to customize and tailor the Service, to administer the Website, and to understand and analyze trends related to the use of the Service.

b) Analytics and Research

We process Personal Data to analyze usage patterns, understand trends, and gather aggregated demographic information about our user base. Such data may be used to generate internal reports, perform research, conduct business intelligence activities, identify potential issues, improve Website functionality, and test new features or content.

c) Security and Fraud Prevention

We process Personal Data to enhance the safety and security of the Website and its services, including the detection, prevention, and mitigation of fraudulent or unauthorized activities.

d) Customer Support

We use Personal Data to provide customer support, respond to Users' inquiries, communicate with Users regarding their requests, and resolve technical or service-related issues.

e) Legal and Regulatory Obligations

We process Personal Data where required to comply with applicable laws, regulations, or legal obligations. For example, we may use information about a User's country or region for regulatory, tax, or compliance purposes.

8. Third-Party Elements and Responsibility

The Website may contain links to external websites, as well as elements, objects, or services that are controlled and operated by third parties.

Such third-party elements may include social media plug-ins or integrations (for example, connections to platforms such as Twitter or hive.one) ("Social Plug-ins"), which are typically identifiable by the relevant third party's logo or branding. When Users interact with Social Plug-ins on the Website, their browser may transmit certain information to the respective third party, such as a user identifier, Website interaction data, date and time of access, and browser-related information. This information is processed by the third-party providers in accordance with their own privacy policies.

We do not control, access, or assume responsibility for third-party elements, plug-ins, Cookies, web beacons, tracking technologies, or external websites that may be accessible through the Website. We also do not control the methods by which such third parties collect or process Personal Data.

Accordingly, Prizrak disclaims any responsibility or liability for the data protection practices of third-party websites or services. Users are encouraged to review the applicable privacy policies of any third-party websites or services accessed through the Website, as this Privacy Policy applies solely to Personal Data processed through the Website.

9. Website Analytics

The Website may use web analytics services, such as Google Analytics, a web analytics service provided by Google Inc. ("Google"), to analyze how Users interact with the Website.

Google Analytics uses Cookies and similar technologies to collect information about Website usage, including interactions, page views, session duration, and technical data related to Users' devices and browsers. The information generated by these Cookies is transmitted to and stored by Google on servers that may be located outside the European Economic Area.

Google processes this information on our behalf for the purpose of evaluating Website usage, compiling reports on Website activity, and improving Website performance. The processing of such data by Google is subject to Google's own privacy policies and data protection practices.

Where required by applicable law, Users may opt out of certain analytics tracking by adjusting their browser settings or by using available opt-out mechanisms provided by Google.

The Website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses Cookies, which are text files stored on the User's device, to analyze how Users interact with the Website.

The information generated by Cookies regarding the User's use of the Website is generally transmitted to and stored on Google servers located in the United States. However, IP anonymization is enabled on the Website. As a result, the User's IP address is shortened by Google within Member States of the European Union or in other states party to the Agreement on the European Economic Area before transmission. Only in exceptional cases will the full IP address be transmitted to a Google server in the United States and anonymized there.

Google processes this information on behalf of the Website operator for the purpose of evaluating Website usage, compiling reports on Website activity, and providing additional services related to Website and Internet usage. The IP address transmitted by the User's browser in connection with Google Analytics will not be merged with other Google data.

Further information on how Google processes Personal Data can be found in Google's privacy policy.

Users may prevent the storage of Cookies by adjusting the settings of their browser software. Please note, however, that disabling Cookies may limit the functionality of the Website and prevent full use of all available features.

Users may also prevent the collection and processing by Google of data generated by Cookies related to their use of the Website (including their IP address) by downloading and installing the browser plug-in available from Google.

10. Users' Rights

As a data subject whose Personal Data is processed in accordance with this Privacy Policy, Users are entitled to a number of rights under applicable data protection laws. Please note that the exercise of these rights is subject to certain requirements and conditions set out in applicable laws and regulations.

Users may exercise their rights at any time by submitting a request to:
privacy@prizrak.ai

Right of Access

Users have the right to obtain confirmation as to whether Personal Data concerning them is being processed and, where that is the case, to request access to such Personal Data, including information on the categories of Personal Data concerned, the purposes of the processing, and the recipients or categories of recipients. This right is not absolute and may be limited where it adversely affects the rights and freedoms of others. If Users request more than one copy of the Personal Data undergoing processing, we may charge a reasonable fee based on administrative costs.

Right to Rectification

Users have the right to request the correction of inaccurate Personal Data concerning them. Depending on the purposes of the processing, Users also have the right to request completion of incomplete Personal Data, including by providing a supplementary statement.

Right to Erasure ("Right to Be Forgotten")

Users have the right to request the erasure of their Personal Data in certain circumstances as defined under applicable law. Where such a request is valid, we will erase the Personal Data without undue delay. If erasure is not technically or organizationally feasible, we will ensure that the Personal Data is irreversibly anonymized so that it can no longer be attributed to the User.

Right to Restriction of Processing

In certain circumstances defined by applicable law, Users have the right to request restriction of the processing of their Personal Data. In such cases, Personal Data will, with the exception of storage, only be processed with the User's consent or for the establishment, exercise, or defense of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest.

Right to Data Portability

Where applicable, Users have the right to receive the Personal Data they have provided to us in a structured, commonly used, and machine-readable format, and to transmit such data to another controller or to have it transmitted directly from us to another controller, where technically feasible.

Right to Object

In certain circumstances defined under applicable law, Users have the right to object, on grounds relating to their particular situation, at any time to the processing of their Personal Data by us. In such cases, we will cease processing unless we demonstrate compelling legitimate grounds for the processing that override the User's interests, rights, and freedoms, or where processing is required for the establishment, exercise, or defense of legal claims. This right applies in particular to processing based on legitimate interests or for statistical purposes.

Right to Object to Direct Marketing

Where Personal Data is processed for direct marketing purposes, Users have the right to object at any time to such processing, including profiling related to direct marketing, without providing any justification.

Right Not to Be Subject to Automated Decision-Making

Subject to applicable legal limitations, Users have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

Right to Withdraw Consent

Where processing of Personal Data is based on User consent, Users may withdraw such consent at any time with future effect. Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal.

Exercising Rights

To exercise any of the rights described above, Users must submit a written request and may be required to provide proof of identity. Requests should be sent to: privacy@prizrak.ai

Any communication relating to the exercise of User rights will be provided free of charge. However, where requests are manifestly unfounded or excessive, particularly due to their repetitive nature, we may charge a reasonable administrative fee or refuse to act on the request.

Users also have the right to lodge a complaint with a competent data protection supervisory authority if they believe that their Personal Data has been processed in violation of applicable law.

Details on the Right to Object

Where Personal Data is processed in the public interest, in the exercise of official authority vested in us, or based on our legitimate interests, Users may object to such processing by providing reasons related to their particular situation.

Where Personal Data is processed for direct marketing purposes, Users may object to such processing at any time without providing any justification. Information on whether Personal Data is processed for direct marketing purposes can be found in the relevant sections of this Privacy Policy.

11. Legal Basis for Processing Personal Data

We collect and process Users' Personal Data for the purposes described in the section "Purposes of Personal Data Processing" of this Privacy Policy based on one or more of the

following legal grounds, as permitted under applicable data protection laws, including Article 6 of the GDPR:

a) Contractual Necessity

We process Personal Data where such processing is necessary for the performance of a contract to which the User is a party or in order to take steps at the request of the User prior to entering into a contract. This includes processing Personal Data to provide, operate, and improve the services requested by the User, deliver customer support, enable access to special features of the Website, and provide any content or services that the User may purchase or request through the Website.

b) Legitimate Interests

We process Personal Data where such processing is necessary for the purposes of our legitimate interests or the legitimate interests of our affiliated entities, provided that such interests are not overridden by the User's fundamental rights and freedoms. Our legitimate interests include ensuring the security and proper functioning of the Website, improving user experience, preventing fraud, performing analytics and usage tracking, delivering push notifications, enabling cross-promotion, and providing contextual (non-intrusive) advertising. We carefully balance our legitimate interests against Users' data protection rights and implement appropriate safeguards to protect Personal Data.

c) Consent

Where processing of Personal Data is based on User consent, we will clearly inform Users of the specific purpose at the time of data collection and obtain consent in a clear and unambiguous manner. Users may withdraw their consent at any time with future effect, without affecting the lawfulness of processing carried out prior to the withdrawal. We will obtain User consent before sharing Personal Data with advertising partners for personalized advertising purposes and before conducting surveys or similar activities.

d) Legal Obligation

We process Personal Data where necessary to comply with applicable legal obligations, such as maintaining records for tax, accounting, regulatory, or compliance purposes.

Where required, we will provide Users with additional information to clarify the specific legal basis applicable to particular processing activities, including whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, and the possible consequences of failing to provide such data.

12. Direct Marketing

Users have the right to opt out of receiving marketing communications at any time, free of charge. Users may unsubscribe by following the instructions included in each marketing email, by adjusting their communication preferences where available, or by contacting us directly.

Requests to unsubscribe or modify marketing communication preferences may be sent to: privacy@prizrak.ai

Withdrawal of consent for marketing communications does not affect the lawfulness of processing carried out prior to such withdrawal.

13. Security

We have implemented appropriate technical and organizational measures designed to protect the confidentiality, integrity, and security of Users' Personal Data and to prevent unauthorized access, disclosure, alteration, or use of Personal Data in a manner inconsistent with this Privacy Policy.

Such measures include, where appropriate, access controls, data minimization, encryption, secure server infrastructure, and internal procedures aimed at safeguarding Personal Data. We use commercially reasonable efforts to ensure that Users' Personal Data remains secure while it is processed and stored by us.

Despite these measures, no method of transmission over the Internet or method of electronic storage is completely secure. Accordingly, while we strive to protect Personal Data, we cannot guarantee absolute security.

14. Place of Processing and International Transfers of Personal Data

Personal Data is processed at our operating offices and at any other locations where parties involved in the processing of Personal Data are situated.

Users' Personal Data may be transferred to, stored, and processed in countries other than the country in which Users reside. Such countries may have data protection laws that differ from those applicable in the User's country of residence.

Where Personal Data is transferred outside the European Economic Area ("EEA"), we ensure that appropriate safeguards are implemented to protect such Personal Data in accordance with this Privacy Policy and applicable data protection laws. These safeguards may include, as applicable:

the use of Standard Contractual Clauses approved by the European Commission for the transfer of Personal Data between us and third-party service providers or partners;

transfers to countries that have been recognized by the European Commission as providing an adequate level of data protection;

transfers to third-party service providers or partners that participate in an approved data protection framework recognized under EU law (where applicable).

We take all reasonably necessary measures to ensure that Users' Personal Data is treated securely and in accordance with this Privacy Policy, regardless of where it is processed.

Users may request additional information regarding international data transfers and the safeguards applied by contacting us at:
privacy@prizrak.ai

15. Data Retention

Users' Personal Data is retained only for as long as necessary to fulfill the specific purposes for which it is processed, as described in this Privacy Policy, unless a shorter or longer retention period is required or permitted under applicable EU data protection laws and regulations.

Personal Data may be retained for a longer period where Users have provided their consent to such processing, provided that such consent has not been withdrawn. In addition, we may be required to retain Personal Data for longer periods where necessary to

comply with legal obligations, regulatory requirements, or binding orders from competent authorities.

Upon expiration of the applicable retention period, Personal Data will be securely deleted or irreversibly anonymized in accordance with applicable legal and technical requirements.

Once Personal Data has been deleted or anonymized following the expiration of the retention period, the rights of access, erasure, rectification, and data portability can no longer be exercised in relation to such data.

16. Children's Privacy

Our Service is not directed to individuals under the age of 18 ("Children"). When collecting Personal Data, we do not actively verify the age of Users and do not knowingly collect personally identifiable Personal Data from Children.

If a User is a parent or legal guardian and becomes aware that their child has provided us with Personal Data without parental consent, we kindly request that they contact us immediately.

If we become aware that we have collected Personal Data from Children without verification of parental consent, we will take appropriate steps to promptly remove such Personal Data from our servers and terminate any account created by a Child in connection with the Website.

17. Additional Information and Changes to This Privacy Policy

In addition to the information contained in this Privacy Policy, the Website may provide Users with additional and contextual information concerning specific Services or the collection and processing of Personal Data, where required or upon request.

For operational and maintenance purposes, the Website and any third-party services used in connection with the Website may collect system logs or other technical data that record interactions with the Website. Such data may include, for example, IP addresses or other technical identifiers and is processed strictly for security, maintenance, and performance purposes.

We may update this Privacy Policy from time to time to reflect changes in legal requirements, technological developments, or our operational practices. The most current version of this Privacy Policy will govern our processing of Personal Data and will always be available on the Website at: www.prizrak.ai

Previous versions of this Privacy Policy may be obtained by contacting us at: privacy@prizrak.ai

18. Contact Us

If Users have any questions, requests, or concerns regarding this Privacy Policy or the processing of Personal Data, Users may contact us using the following channels:

Privacy questions and exercising Users' rights:
privacy@prizrak.ai

EEA Users — supervisory authority complaints:

If Users are located in the European Economic Area ("EEA") and have concerns about our processing of Personal Data, Users have the right to contact the competent data protection

supervisory authority. Contact details of EEA supervisory authorities are available via the European Data Protection Board (EDPB).

For assistance in identifying the appropriate supervisory authority, Users may contact us at: privacy@prizrak.ai

General inquiries:

info@prizrak.ai