

## WingRiders

### Privacy and Online Services Notice

**Welcome to WingRiders (“we”, “us” or “WingRiders”). We provide a web application providing decentralised finance services (our “Services”) to users of the service (“you”). To provide our Services we need to collect some of your data, when you are using our service on <https://www.wingriders.com/> (our “Site”).**

WingRiders is committed to being a responsible custodian of the information you provide to us and the information we collect. This Privacy and Online Services Notice (this **Notice**) describes how we may collect, use and share personal information in connection with your use of our Site and the offering of our native DEX Tokens (“Tokens”). This Privacy Notice should be read alongside, and in addition to the **Terms & Conditions**.

Please read the following carefully to understand our practices regarding your personal information. If you do not wish for your personal information to be used in the manner described within this Notice, you should not access our Site and all subdomains thereof, utilise our Services, participate in the offering of Tokens or otherwise provide WingRiders with your personal information.

WingRiders Ltd is the data controller of your personal information processed in connection with our Services and the offering of Tokens. In addition, our current or future affiliated companies including WingRiders-TGE Ltd, their respective parent companies, subsidiaries or joint ventures may also be provided with your data, if sharing the data with them is necessary to fulfil the purpose of the data processing.

This Notice applies to the actions and responsibilities of all such entities where they act as data controllers of your personal information. References to **we**, **us** or **our** in this Notice are references to the relevant company responsible for processing your personal information. In some cases, our affiliated entities may operate as data processors on our behalf, and we will ensure that such activities are subject to contractual obligations on privacy, security and other matters in accordance with this Notice.

Please ensure that any relevant individuals are made aware of this Notice and the individual rights and information it sets out, prior to providing their information to us or our obtaining their information from another source. If you, or anyone else on your behalf, has provided or provides information on an individual connected to your business to us, you or they must first ensure that you or they have the authority and appropriate legal basis to do so.

**Please also note:**

- Unless otherwise defined in this Notice, terms used have the same meaning as in the Terms & Conditions.

- The Notice does not address, and we are not responsible for, the privacy practices of any other parties, or data publicly available on the blockchain.
- We do not knowingly collect or ask for data, including personal information, from people under the age of 18. If you are such a person, please do not use our service or send us your data. We delete data that we learn is collected from a person under the age of 18.

### **The types of information we collect**

'Personal information' is any information that, either alone or in combination with other data, enables you to be directly or indirectly identified (for example, your name, email address, contact details, or any unique identifier such as an internet protocol ('IP') address, device ID or other online identifier). We collect your personal information when you provide it to us. We may also automatically collect certain information when you use, access, or interact with our Services.

#### *Information you provide to us*

As part of the registration process, purchasers of Tokens are required to submit documents and personal information as described in our Know-Your-Client (KYC) policy. The requirements are set out in more detail therein, and may be subject to additional requests by us. However, by way of example, we may collect the following information from you:

- first and last name;
- date of birth;
- nationality and country of residence;
- residential address;
- email address;
- passport number and issuing body; and
- your wallet address, any other cryptocurrency wallet address or bank account details and any related transaction details recorded by any blockchain on which the Tokens are based or utilised.

In addition, where you utilise the Site, we may collect additional information from you. This may include your personal information (including copies of your identity documents, your residential address and contact details) and your IP address.

We may also collect information that you voluntarily provide to us, including when you communicate with us via email, on social media or other channels, when you register for our updates and when you respond to our communications or requests for information. The information you provide may include your name, contact information, title and other personal information about you.

### *Information we may collect automatically through cookies and similar technologies*

By accessing our Site we may also automatically collect certain data from your browser, including server log information (such as login details, IP address and details on the time spent on various pages of our Site) and device and browser information (such as the type of device, universally unique identifiers ('UUID'), advertising identifiers ('IDFA'), type of browser, operating system, hardware and processor information, plug-ins and add-ons).

Similar to other websites, our Site utilises browser cookies (small text files stored on a user's web browser when you visit a website), web beacons and similar tracking technologies (collectively, **Cookies**) to collect and store certain information when you use, access, or interact with our Site. We may, for example, use Cookies to collect information about the type of device you use to access the Site, your browser type, your IP address or other identifier, your general geographic location as indicated by your IP address, features you access on the Site, whether and how you interact with content available on the Site.

We use Cookies to remember your preferences and settings, to remember information that you may enter online, to generate aggregate statistics about how people use our Services, to help you share content with others and to improve your experience of the Services.

You can choose how Cookies are handled by your device through your browser or through our cookie banner, including refusing or deleting all Cookies. If you choose not to receive Cookies at any time, websites may not function properly and certain services may not be provided. Each browser and device is different, so check the settings menu of the browser or device you are using to learn how to change your advertising settings and Cookie preferences.

### *Information we may collect from third party sources*

We may receive information about you from other sources, including third parties that can lawfully share the information with us and help us update, expand, and analyse our records, prevent or detect fraud or other suspicious activities and process payments. In addition, our Site may also include integrated content or links to content provided by third parties (such as live chat, social media content, plug-ins and applications) – see the section entitled "Third party services and content" below.

### **How we use the information we collect**

We may use the information we collect:

- to conduct know-your-client and anti-money laundering and other sanctions checks (or to verify those carried out by third party sources);
- to provide you with our Services and other services that you request including, as applicable, supplying, and processing your payment for Tokens and any other services to be provided to you;

- to respond to your enquiries or to any problems that may arise (such as difficulties in purchasing Tokens, navigating our Site or accessing certain services or features);
- to inform you of important changes or developments to our Services or policies and to provide you with technical, support or administrative notifications;
- to make payments to you;
- with your separate consent, to send you marketing communications, and other information or materials that may be of interest you or which you have expressed an interest in receiving (and subject to your ability to opt-out from receiving those communications);
- to maintain our list of contacts;
- to understand how people use our Site, including by generating and analysing statistics and user trends, and to evaluate, administer, maintain and improve our Site and other services;
- for internal development of new products or services;
- for our internal business purposes, including data analysis, invoicing and detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement;
- to assess the effectiveness of our promotional campaigns and publications; and
- as is necessary, advisable or appropriate to comply with our legal or regulatory obligations and to respond to legal, regulatory, arbitration or government process or requests for information issued by government authorities or other third parties or to protect your, our, or others' rights.

Further, we may aggregate personal and other data captured through our Site so that the data is no longer capable of identifying an individual. We reserve the right to use this aggregated information for the purposes of improving and enhancing our services, generating insights, for use in marketing to other users and current and potential partners and otherwise for the purposes of our business. Provided that such aggregated data does not directly or indirectly identify you as an individual, this data is not considered to be personal information for the purpose of this Notice.

#### **How we may share the information we collect**

We may share the personal information we collect with our current or future affiliated entities, as explained at the beginning of this Notice.

We may also disclose information we collect:

- To our partners and third party service providers that perform services on our behalf such as marketing companies, web-hosting companies, analytics providers and information technology providers. In these circumstances contractual and other technical and security safeguards will

be put in place with the partner or service provider, including to ensure that your personal information is processed only in accordance with this Notice.

- To law enforcement, other government authorities, or third parties (within or outside the jurisdiction in which you reside) as may be permitted or required by the laws of any jurisdiction that may apply to us, as provided for under contract, as we deem reasonably necessary to provide legal services or if we believe your actions are inconsistent with our agreements and policies, and the disclosure is required by applicable law. In these circumstances, we will take reasonable efforts to notify you before we disclose information that may reasonably identify you or your organisation, unless prior notice is prohibited by applicable law or is not possible or reasonable in the circumstances.
- To service providers, advisors, potential transactional partners, or other third parties in connection with the completion of a transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets. Upon completion of such a transaction, your personal information will continue to be processed in accordance with this Notice, except as otherwise agreed by you or permitted by applicable law.
- To partners, financial institutions or service providers who may request such information in connection with providing services to us, including banking services, and only where we enter into an agreement with such institutions to limit their use and handling of personal information in accordance with this Notice.
- To our employees where required or necessary for the performance of their duties and in line with the reasons for processing. Our employees are required to keep that information confidential and are not permitted to use it for any purposes other than to enable you to use the Services or to deal with requests which you submit to us.

We do not sell, rent, or otherwise share personal information that reasonably identifies you or your organisation with unaffiliated entities for their independent use except as expressly described in this Notice or with your prior permission. We may share information that does not reasonably identify you or your organisation as permitted by applicable law.

When you voluntarily make your personal information available online in an environment shared by third parties (for example, on messaging applications, social media, message boards, web logs, or emails), that personal information may be viewed, saved, collected, heard, used and/or shared by others outside of WingRiders. We are not responsible for any unauthorised third party use of information provided in these contexts. Please be mindful whenever you share any information in such environments.

### **Grounds for using your personal information**

We rely on the following legal grounds to process your personal information, namely:

- *Necessity for performance of a contract* – We may need to collect and use your personal information to enter into a contract with you or to perform a contract that you have with us, for example, when you provide personal information to us to purchase Tokens;
- *Legal obligation* – We may process your personal information as may be required to comply with any legal or regulatory obligations that may apply to us, for instance under anti-money laundering and sanctions regimes.
- *Legitimate interests* – We may use your personal information for our legitimate interests to improve our Services. Consistent with our legitimate interests and any consents that may be required under applicable laws, we may use technical information as described in this Notice and use personal information for our marketing purposes provided that those interests are not outweighed by your interests, rights and freedoms.
- *Consent* - To withdraw your consent to such use, you can contact **support@wingriders.com**. The electronic marketing communications we send to you also contain opt-out mechanisms that allow you to opt-out from receiving those communications, update your contact information or change your preferences at any time. You may be able to disable the sharing of location information in your browser settings. Where required by applicable laws, we will rely on your consent for direct marketing and to collect information from your device or computer.

### **Third party services and content**

Our Site may include integrated content or links to content provided by third parties (such as video materials, social media content, plug-ins and applications).

Please note that the websites, applications and services of third parties (including affiliates, partners, sponsors, advertisers or other persons) will be governed by the privacy settings, policies, and/or procedures of the third party, which may differ from this Notice. This Notice does not address, and we are not responsible for or able to control, the privacy, security, or other practices of such third parties.

### **Protection and storage of the information we collect**

We deploy administrative, technical and physical safeguards designed to comply with applicable legal requirements and to safeguard the information that we collect. This includes, when required or appropriate and feasible, obtaining written assurances from third parties that may access your personal information that they will protect the information with safeguards designed to provide a level of protection equivalent to that adopted by WingRiders.

However, no information system can be 100% secure. So, we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the internet and wireless networks.

We may store the information we collect in on our servers both cloud based or in servers located in countries where we or our service providers have facilities. Therefore, we may transfer information to countries outside of your country of residence which may have data protection laws and regulations that differ from those in your country.

We retain the information we collect for no longer than is reasonably necessary to fulfil the purposes for which we collect the information and to comply with our legal obligations.

### **Your choices and rights**

To withdraw your consent to the use of your information as described in this Notice you can contact us through the methods stated below. Please note that in some circumstances this may mean that we can no longer provide our Services to you.

If you no longer wish to receive marketing communications from us, you can also let us know via through the methods stated below. The electronic marketing communications we send to you also contain opt-out mechanisms that allow you to opt-out from receiving those communications, update your contact information or change your preferences at any time. We will honour your choice and refrain from sending you such announcements. You may also opt back in to receive those communications at any time.

Under local law, you may have certain rights regarding your personal information that we have collected, including that EU residents have the right to request: (i) access to your personal information, (ii) rectification or erasure of personal information, (iii) restriction of processing concerning you, (iv) objection to processing that is based upon our legitimate interests, and (v) data portability to other service providers. Your ability to exercise these rights will depend on a number of factors and, in some instances, we will not be able to comply with your request, for example because we have legitimate grounds for not doing so or where the right doesn't apply to the particular information we hold on you. Where so entitled to access to your personal information, you will not have to pay a fee unless your request is clearly unfounded, repetitive or excessive (upon which we may charge a reasonable fee or refuse to comply with your request). If you would like to discuss or exercise the rights you may have, you can contact us through the methods stated below.

### **It is important that any personal information we hold about you is accurate and current**

Please keep us informed if your personal information changes whilst we continue to retain such information. We encourage you to contact us to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate or out of date. You can also ask us to see what personal information we hold about you and to erase your personal information if it is no longer required. You may also tell us if you object to our use of your personal information.

### **How to contact us**

We welcome your enquiries and comments.

If you would like to contact us regarding this Notice or to withdraw your consent to this Notice or any aspect of it, please send us an email at [\*\*support@wingriders.com\*\*](mailto:support@wingriders.com)

We try to respond to all legitimate enquiries within 30 days. Occasionally it may take us longer 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.

### **Complaints**

We are committed to working with you to obtain a fair resolution of any complaint or concern about your privacy. If you would like to contact us, please use the methods stated above.

If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to complain to the data protection authority/regulator, as applicable, in your jurisdiction.

### **Changes to this Notice**

We may update this Notice from time to time and we encourage you to periodically review this Notice. If we make any material changes to this Notice regarding the way we collect, use, and/or share the personal information that you have provided, we will notify you by posting notice of the changes in a clear and conspicuous manner on the Site or, if we hold your email address, by email.

The use of certain of our Services may also be governed by other applicable terms and policies regarding privacy and the sharing of personal information, which supplement, and should be reviewed alongside, this Notice.

Last Updated: March 2022