

Kyoku Wallet Privacy Policy

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Kyoku (“**we**,” “**us**,” or “**our**”) values your privacy and is committed to protecting your personal information.

This Privacy Policy (“**Policy**”) describes how we collect, use, and disclose information when you use the Kyoku browser extension, our website, and related services (collectively, the “**Services**”). It also explains your rights and choices regarding your personal data. By using Kyoku, you agree to the collection and use of information as outlined in this Policy.

Overview – Key Privacy Principles:

- **No Personal Info Required:** You do not need to provide your name, email, phone number, or other personal identifiers to use Kyoku’s core wallet features. Kyoku is a non-custodial Solana wallet – you always retain full control of your funds and private keys.
- **Limited Use of IP Addresses:** We do not use your IP address for advertising or marketing, and we do not link your IP address with information that directly identifies you (such as your wallet address or account identity). IP addresses are used only for technical purposes like providing the service, security, and compliance as described below.
- **No Tracking of Personal Identity or Balances:** Your privacy matters. We never track any personally identifiable information, or your wallet asset balances on our servers. Public blockchain data (like your Solana wallet address and on-chain transactions) is only processed as needed to provide and improve our Services.
- **Analytics Respect Your Privacy:** Kyoku may collect basic analytics to improve the product, but you have the option to opt out of any optional analytics for greater privacy. We aim to be transparent about any data we collect and why.
- **No Selling of Data:** We do not sell your personal information or share it with third parties for their own direct marketing or targeted advertising purposes.
- **Privacy Updates:** We will update this Policy to reflect on any changes in our practices or applicable laws, and we encourage you to review it periodically.

Information We Collect

We collect information about you in three ways: (1) information you provide directly, (2) information collected automatically through your use of Kyoku, and (3) information from third parties. We minimize the data we collect to only what is necessary to operate our Services effectively.

1. Information You Provide Directly

You can use Kyoku’s wallet features without registering an account or providing personal details. However, you might choose to share certain information with us in specific interactions:

- **Contact and Support Information:** If you contact us for support or feedback, or if you sign up for an email newsletter or participate in promotions/surveys, you may provide personal identifiers (like your name, email address, or social media handle) and any information you include in your communications. We will

collect and use this information solely to respond to you and provide customer support or the requested service.

- **Optional Account/Profile Data:** Kyoku does not require any account signup to use the wallet. If in the future we offer user profiles or usernames/avatars, providing such information would be entirely optional and used only for enhancing your experience (for example, setting a display name or profile image within the wallet).
- **Feedback and Survey Responses:** You might provide information about your experience, preferences, or opinions if you respond to surveys or beta testing feedback requests. This data is voluntary and will be used to improve our Services.

Note: We do *not* ask for or collect any government identifiers, tax IDs, or other sensitive personal data to use Kyoku. Please do not provide any sensitive personal information beyond what is requested, and especially never share your wallet's secret recovery phrase or private keys with us, as we will never ask for them. Kyoku's wallet is self-custodial, and your private keys remain on your device (secured by the extension and your password); we cannot access or recover them for you.

2. Information We Collect Automatically

When you use the Kyoku wallet extension or website, certain information is collected automatically about your device and how you interact with our Services. This includes:

- **Public Blockchain Data:** Kyoku is a Solana blockchain wallet, so by nature we interact with public blockchain records. This means we may process data like your public wallet addresses, public account balances, and transaction details to display them to you in the wallet and enable transactions. This data is publicly available on the Solana blockchain, and not private to you. We use this on-chain data *only* to provide you with the Services (e.g., showing your token holdings and NFT assets, or your transaction history in the wallet interface), to improve and develop features, and for other legitimate purposes described in this Policy. Keep in mind that transactions you broadcast via Kyoku are recorded on the Solana blockchain, which is a public ledger; Kyoku cannot erase or alter blockchain records, and any public data (including potentially metadata like transaction timestamps or token addresses) is beyond our control once published to the blockchain. We urge you to use caution and avoid embedding personal information in any blockchain transactions.
- **Cookies and Similar Technologies:** If you use our website (for example, to learn about Kyoku or access support pages), we and our third-party partners use cookies and similar tracking technologies to remember your preferences and track site usage. Cookies are small data files stored on your browser. They help with functions such as keeping you logged in, understanding how visitors navigate our site, and analyzing aggregate traffic patterns. For details, see the Cookies and Tracking section below. (Note: the Kyoku browser extension itself does not use traditional cookies, but it may use local storage or other mechanisms for settings and may send anonymized analytics events as described, which are analogous to cookies in function.)

3. Information from Third Parties

At present, Kyoku does not obtain much personal data from third parties. However, we may receive information about you from third-party sources in the following scenarios:

- **Referrals and Partners:** If you were referred to Kyoku through a promotion or partner campaign, we might receive basic attribution data (such as a referral code or the partner's identity) to know the source of new user sign-ups. This generally does not include personal details about you, just aggregate counts.
- **Public Sources:** We may also obtain information that is publicly available. For example, we might see public social media posts or community forum discussions about Kyoku that you chose to share. We may use such public information to address user concerns or improve our services, consistent with your privacy settings on those platforms.

We do **not** purchase personal data from data brokers or unrelated third parties. Any third-party data we use will either be highly contextual (as above) or aggregated/anonymized information.

How We Use Your Information

We use the collected information for various purposes aligned with providing and improving Kyoku's Services. We will never use your data for any purpose that is incompatible with the reasons outlined below. Specifically, we use your information to:

- **Provide and Maintain the Services:** We process your information to allow you to use Kyoku's features – for example, to enable sending and receiving of tokens, displaying your NFT collection and token balances, showing transaction history, facilitating staking (when introduced), and connecting to Solana dApps. This includes using public wallet and transaction data to update your wallet interface, and using necessary technical data (IP address, device info) to deliver content correctly and securely to your device. We also use your contact or account information (if provided) to communicate with you about your use of the Services, respond to your inquiries, or provide customer support.
- **Ensure Security and Prevent Fraud:** Information (like IP addresses or device identifiers) is used to protect the integrity of our Services and our users. We monitor suspicious or malicious activity to prevent unauthorized access, phishing, theft, or other misuse of the wallet. For example, temporary IP address logs help us mitigate DDoS attacks or detect repeated failed access attempts. Public blockchain transactions are also monitored in aggregate to detect security incidents affecting users (such as widespread hacks or malware attacks), and to alert users of known threats (e.g., flagging suspicious token programs).
- **Improve, Personalize, and Develop the Services:** We use usage data and optional analytics to understand how users interact with Kyoku in order to improve our software. This helps us identify bugs, design new features, and make Kyoku more user-friendly. For instance, knowing which features are used most (e.g. viewing NFTs vs. swapping tokens) can guide our development priorities. We might also use your general location (e.g., country) to optimize language or regional settings, or to ensure content is relevant. All analytics are handled in aggregate or pseudonymous form – we look at trends and statistics not individual profiles whenever possible. If we ever introduce personalized content in the app, it would be based on your in-app actions or preferences, not on any external personal profile.
- **Communicate Updates and Marketing (with Consent):** If you provide your email or contact info, we may send you news about Kyoku, such as important security updates, new feature releases, newsletters, or promotions but only if you have opted in to such communications. You can unsubscribe from marketing emails at any time. (Transactional or essential service emails, like responses to support requests or notifications about important changes, may be sent even if you opt out of marketing, as they are not promotional in nature.)
- **Comply with Legal Obligations:** We may process and retain certain data to fulfill our legal and regulatory obligations. For example, we may use your information to comply with applicable laws and regulations

(such as know-your-customer or anti-money laundering laws *if* they become relevant to our Services), to respond to lawful requests by public authorities, or to meet record-keeping and tax requirements. If required by law, we might use your country or state information to apply the correct privacy practices or restrictions (for instance, blocking usage in sanctioned regions).

- **Enforce Terms and Policies:** Information may be used to enforce our Terms of Service and other agreements, including investigating potential violations, misuse of our Services, or fraud. We use data to exercise or defend legal claims if necessary, and generally to protect our rights, property, and the safety of our users or others. This could include sharing minimal information in connection with an investigation or dispute, consistent with the How We Share section below.

We will not use personal data in ways that have unjustified adverse effects on your privacy. If we need to use your information for a new purpose not listed above, we will update this Privacy Policy and, if required by law, notify you or obtain your consent.

How We Share Your Information

We understand that your information is important, and we treat it with care. We do not sell your personal data to third parties for their own marketing. We only share information in the following circumstances and with appropriate safeguards:

- **With Your Consent or at Your Direction:** We will share your information with third parties if (and only if) you intentionally direct us to. For example, if you connect Kyoku to a third-party decentralized application (dApp) or service, you are instructing us to share your wallet public address (and any data you authorize) with that dApp. Similarly, if Kyoku introduces a feature to integrate with an exchange or staking service and you choose to use it, we will disclose necessary information to facilitate that transaction, as you expect. In all such cases, we will disclose the information *you* direct us to share, at the time of your action or consent.
- **Affiliates:** If Kyoku is part of a group of related companies, we may share your information with our corporate affiliates (entities under common ownership or control). Any such affiliate will honor the commitments of this Privacy Policy. This sharing helps us streamline operations and improve Services (for example, an affiliate might help with development or customer support), and all affiliates are bound to protect your data to at least the same standard.
- **Service Providers and Vendors:** We employ trusted third-party companies and individuals to perform services on our behalf (“service providers”), such as cloud hosting, data analytics, crash reporting, customer support tools, email delivery, and other operational support. These third parties may only access and process your information to carry out the tasks we have hired them for, in compliance with this Policy and applicable law. For instance, we might use analytics providers to help us understand usage patterns (who will receive pseudonymous usage data) or use an email service to send newsletters (which would have your email address for that purpose). We require all service providers to protect your data and not use it for any unrelated purpose.
- **Business Transfers:** If we undergo a business transaction such as a merger, acquisition, reorganization, or sale of some or all assets, your information may be transferred as part of that deal. We will ensure any successor entity honors the commitments of this Policy with respect to your personal data. Similarly, if we contemplate such a transaction, information might be shared under appropriate confidentiality agreements as part of due diligence.
- **Legal Compliance and Protection:** We may disclose information about you if required to do so by law or legal process, or if we have a good-faith belief that such disclosure is reasonably necessary to comply with legal obligations. This includes responding to lawful requests by public authorities (e.g., law enforcement or regulatory agency inquiries). We may also share information as necessary to enforce our Terms of Service

or other agreements, investigate or defend ourselves against third-party claims or allegations, detect or prevent fraud and security issues, and protect the rights, property, and safety of Kyoku, our users, or others. Any such disclosure will be made in accordance with applicable laws.

- **Aggregated or De-Identified Data:** We may share information that has been aggregated (combined with data from many users) or de-identified (stripped of personal identifiers) such that it cannot reasonably be used to identify you. For example, we might publish usage statistics or share trends about wallet activity, user growth, or feature popularity. This information does not include personal data and may be shared with partners, researchers, or the public for analytics, marketing, or other business purposes. We will not re-identify de-identified data, and we contractually prohibit third parties from attempting to do so.

No Sharing for Marketing: To reiterate, we do *not* share your personal information with unaffiliated third parties for their own marketing or advertising purposes. Kyoku does not rent or sell user data. Any third-party analytics or advertising services we use (if any) will not receive your personal data except as described above, and they will not be allowed to use it beyond providing services to us.

Cookies and Tracking Technologies

When you access the Kyoku website or online resources, we use cookies and similar tracking technologies to enhance your experience and gather usage data. This section explains how we use these technologies:

- **Cookies:** Cookies are small text files that websites send to your device to store information about your preferences or usage. We use cookies to remember your settings (such as language preference), to keep you logged in (for any web-based account features), and to collect anonymous information about how our site is used. For example, we use session cookies (which expire when you close your browser) to understand site traffic and see which pages are visited during a single session. We use persistent cookies (which remain on your browser for a set period or until you delete them) to recognize you on return visits and compile long-term aggregate analytics about repeat usage. These cookies help us improve the website's content and navigation.
- **Analytics Tools:** We may utilize third-party analytics services (such as Google Analytics or similar) that use cookies or scripts to collect information about website usage and performance. These analytics services collect information like your page requests, time spent on pages, clicks and scrolls, and conversion information. This helps us understand user engagement and improve our web presence. The information collected is generally aggregated and not used to identify you personally. Some analytics tools may also receive truncated or anonymized IP addresses as part of their data collection (for instance, Google Analytics can use IP anonymization). We do not allow analytics providers to use our collected data for their own purposes.
- **Advertising and Tracking Pixels:** Kyoku currently does not display third-party ads on our site, so we do not use third-party advertising cookies. If this changes, we will update this Policy and provide relevant opt-in mechanisms as required by law. We may use tracking pixels or similar technologies in our marketing emails (if you subscribed) to gauge campaign effectiveness (e.g., seeing if an email was opened). You can disable images in your email client if you prefer not to allow this kind of tracking in emails.
- **Do-Not-Track:** Web browsers offer a "Do Not Track" (DNT) option that lets you signal a preference not to have your online activities tracked. At this time, our website does not respond to DNT signals in a standardized way. We adhere to the privacy practices described in this Policy and provide the optout choices described here regardless of DNT. You can always adjust your browser settings to restrict cookies if you wish (see below).

Your Choices for Cookies: Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies or alert you when cookies are being sent. Please note, however, that if you disable cookies entirely, some features of our website may not function properly (for example, keeping you logged in or remembering your preferences might not work). You can also selectively disable certain cookies – for instance, you might choose to disable third-party analytics cookies by using browser extensions or settings, or by using opt-out mechanisms provided by those analytics services. For mobile apps or the Kyoku extension, standard cookies are not used, but you can reset device identifiers or limit ad tracking in your device settings if applicable.

Third-Party Links and DApps

Kyoku may contain links to third-party websites or integrate with third-party decentralized applications. This Policy does not apply to any external sites or services that are not operated by us. For example, if you follow a link on our website to an external blog, or if you use Kyoku to connect to a DeFi application or NFT marketplace, any data those third parties collect or that you provide to them is governed by their own privacy policies – not Kyoku's. We are not responsible for the privacy practices of other websites, services, or blockchain applications.

We encourage you to be aware when you leave our Services and to review the privacy policies of any third-party sites or dApps that you visit or interact with. This is especially important when signing transactions via Kyoku: always make sure you trust the application you are connecting to, as any information you provide directly to that application (including your public wallet address or any personal data you input into a dApp) will be subject to the dApp's privacy and data handling practices.

Data Security

We take the security of your data seriously and implement appropriate measures to protect it. While no system is 100% foolproof, we follow the best industry practices to safeguard your information against loss, theft, misuse, and unauthorized access or disclosure. Our security measures include:

- **Encryption:** Communications between the Kyoku extension, our website, and our backend services are encrypted via HTTPS/TLS. This protects your data in transit from eavesdropping. Within the extension, sensitive data (like your wallet private keys) are stored encrypted using strong cryptographic algorithms, accessible only with your wallet password.
- **Access Controls:** We limit access to personal data to authorized personnel who need it to operate or improve our Services. Our team is trained in confidentiality and the importance of user privacy. We also employ authentication and access control mechanisms to prevent unauthorized access to our systems.
- **Non-Custodial Design:** Kyoku is self-custodial – we never store your private keys, seed phrases, or any secret cryptographic material on our servers. All transactions are signed locally on your device (client-side). This means *even we* cannot initiate a transaction or access your funds; only you can, using your device and password. By keeping custody in your hands, we eliminate a major target for attackers. *(Reminder: Keep your seed phrase safe and do not share it. Kyoku will never ask for it, and we cannot help you recover it if lost.)*
- **Security Testing:** We regularly update Kyoku with security patches and improvements. Our code and infrastructure may be audited by independent security experts to identify and fix potential vulnerabilities. We also maintain a bug bounty program or responsible disclosure process to encourage security researchers to report issues to us.

- **Monitoring and Threat Detection:** We utilize monitoring tools to alert us of suspicious activities or potential security incidents. In the event of any data breach or security issue affecting your personal data, we will notify you and the appropriate authorities as required by law.
- **Organizational Measures:** Internally, we have policies and procedures designed to ensure data is handled and disposed of safely. We minimize the data we store and pseudonymize or anonymize data where feasible. We also perform regular backups of critical data to prevent loss and store them securely.

Despite our efforts, no electronic storage or transmission can be guaranteed 100% secure. You should also take steps to protect your information – for example, use a strong, unique password for Kyoku, enable any available security features, and guard access to your devices. If you have reason to believe that your interaction with us or your Kyoku wallet is no longer secure (for instance, if you suspect your wallet credentials have been compromised), please contact us immediately.

Data Retention

We retain personal information for only as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In practice, this means:

- **Wallet and Transaction Data:** Blockchain data (like transaction history and balances) is not stored on our servers beyond caching for performance, since it exists permanently on the public Solana ledger. Any caching is ephemeral or short-term. Your wallet address may be stored longer (e.g., in log files or database records of user activity), but we treat it as pseudonymous data and keep it only as needed for support, analytics or security monitoring.
- **Support and Contact Data:** If you provided contact information (such as email correspondence with our team), we will retain that information if need to respond to you and maintain records of our communication. Typically, support tickets and emails are retained for a period in case you have follow-up issues or improve our support process. We may purge or anonymize old support data periodically if it's no longer needed.
- **Analytics Data:** Analytics and usage data is generally aggregated and retained for trend analysis. Raw logs of website visits or app usage (which may include IP addresses or device IDs) are retained for a short duration – often automatically rotated or deleted within a few months – unless required longer for security analysis. Aggregated data (with personal identifiers removed) may be kept longer for historical reporting.
- **Legal Compliance:** In some cases, we may need to keep certain information for an extended period to comply with law or for legitimate business purposes. For example, if a law requires us to keep transaction records or if we need to retain data to enforce our agreements or resolve disputes, we will keep the relevant data until we no longer have an obligation or a legitimate need to hold it.

When we have no ongoing legitimate need or legal requirement to process your personal information, we will delete it or anonymize it. If deletion or anonymization is not immediately feasible (for example, because the data is stored in backup archives), we will securely store the data and isolate it from further use until deletion is possible.

Your Rights and Choices

You have certain rights and choices regarding your personal information. Kyoku is designed to give you control, and we also comply with applicable data protection laws that provide rights to users. These rights and how to exercise them are outlined below.

- **Access and Portability:** You have the right to request access to the personal information we hold about you. This includes asking for a copy of your data in a common format (data portability), to the extent required by law.
- **Correction:** If any personal data we have is inaccurate or incomplete, you have the right to request that we correct or update it. For example, if you change your email address and have an account or newsletter subscription with us, you can update your information.
- **Deletion:** You can ask us to delete the personal information we have collected about you. We will honor such requests to the extent we are required to by law. Do note that we might need to retain certain information if we have a legal obligation or ongoing legitimate business reason (for instance, a record of a transaction or a support interaction we are required to keep). We will inform you if any data cannot be deleted due to such obligations.
- **Restriction of Processing:** You have the right to request that we limit the processing of your personal data in certain circumstances (for example, if you contest the accuracy of the data or if you want to restrict processing while a legal claim is pending).
- **Objection to Processing:** You may have the right to object to our processing of your personal data if Our processing is based on legitimate interests or if we were to use your data for direct marketing. If you object, we will re-evaluate your request and stop or limit processing unless we have compelling legitimate grounds to continue or as otherwise permitted by law. In practice, Kyoku does not perform much processing on a basis that would likely trigger objections (and we do not do any direct marketing without consent).
- **Withdraw Consent:** Where we rely on your consent to process personal information (such as for optional marketing emails), you have the right to withdraw that consent at any time. For example, you can unsubscribe from our newsletters using the link provided in the emails or adjust settings if the app provides a toggle for analytics. Withdrawing consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, and it will not affect the processing of your data under other legal bases.
- **Opt-Out of Analytics:** If you prefer not to be included in our analytics data, you may have the ability to opt out. This could be through a setting in the Kyoku extension (if available) or by contacting us. Additionally, you can utilize browser or device settings to limit certain tracking (as described in the Cookies section). We honor such opt-outs by not including your app usage in our analytics collection to the extent feasible.
- **Opt-Out of Marketing:** If you have provided your email for updates, you can opt out of marketing emails at any time by clicking the “unsubscribe” link in those emails or contacting us. Please note you may still receive service-related communications (for example, an email verification or critical security notice) as these are not promotional.

How to Exercise Your Rights: To exercise any of your rights, please contact us at the email provided in the Contact section below with your request. We may need to verify your identity before fulfilling the request (to ensure that we do not disclose or delete someone else’s data by mistake). Verification might involve confirming account details or other information. We will respond to your request within a reasonable timeframe as required by law. If we cannot fulfill your request (due to legal exceptions or an inability to verify you, for example), we will explain the reasoning in our response.

We will not discriminate against you for exercising any of these rights. In other words, if you choose to exercise your privacy rights, we will not deny you the Services, give you a poorer experience, or charge you different prices or fees because of your choice (except where a different level of service is inherently related to the data involved, as permitted by law).

Additional Information for California Residents

If you are a resident of California, you are protected by specific privacy rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), and similar laws in other states. This section, together with the rest of our Policy, is intended to satisfy those laws and provide the required notices to California residents about our data practices.

Categories of Personal Information Collected: In the preceding 12 months, Kyoku may have collected (from and about users) the following categories of personal information, as defined in California law:

- **Identifiers:** For example, a user's blockchain wallet address or public key (which can be linked to an individual's profile on our Service), and if provided, an email address or username for contact purposes. We do *not* collect real name, postal addresses, phone numbers, or government IDs, since our wallet does not require those. Online identifiers like device IDs or IP addresses may be collected as described above.
- **Commercial Information:** This includes records of transactions or holdings of digital assets (e.g., When you use Kyoku, we process information about the cryptocurrency transactions you perform and your token balances to display them to you) . Note that while we facilitate viewing this data, the authoritative record of your transactions is on the public blockchain.
- **Internet or Other Electronic Network Activity Information:** Such as usage data and browsing information on our website or extension – e.g., log data, pages or features accessed, clicks, timestamps, and IP address of your device.
- **Geolocation Data:** Only approximate location derived from IP address (e.g., city, state, country). We do not collect precise GPS coordinates.
- **Inferences:** We do not intentionally derive or profile characteristics from your usage. We do not collect or infer sensitive characteristics (e.g., we don't know your race, religion, or health status, unless you volunteer such information to us through communications, which we do not solicit). We also do not collect sensitive personal information as defined under California law (such as social security numbers, driver's license, financial account info, precise geolocation, etc.).

Categories of Sources: We collect personal information directly from you (e.g., when you communicate with us), automatically through your use of Services (e.g., device and blockchain data), and from third- party sources as described in the *Information We Collect* section of this Policy.

Business or Commercial Purposes for Collection: We collect and use the above personal information for the business and commercial purposes described in the *How We Use Your Information* section, including providing the Services, security, improving our offerings, and complying with legal obligations.

Categories of Third Parties Shared With: We may disclose personal information to the following categories of third parties for the business purposes outlined in this Policy: our service providers and contractors (such as cloud hosting providers, analytics providers, email or support tool providers), affiliates, law enforcement or government agencies (if required by law), and future acquiring companies (in the event of a business transfer). We do *not* sell your personal information, and we do not share it for cross- context behavioral advertising as defined by California law.

In the last 12 months, we have not sold personal information and have not shared personal information for targeted advertising purposes. We also do not use or disclose sensitive personal information for purposes that California law deems unrelated or unnecessary for providing the Services (we largely do not collect sensitive personal info at all).

Your California Privacy Rights: If you are a California resident, you have the following rights with respect to your personal information, in addition to those listed in the *Your Rights and Choices* section:

- The right to know what personal information we have collected about you in the past 12 months, including the specific pieces of information, the categories of information, the categories of sources, the business purposes for collection, and the categories of third parties with whom we disclosed that information. This includes the right to request that we provide you with the above details as applicable.
- The right to delete your personal information that we have collected, subject to certain exceptions (such as if the information is necessary to complete a transaction you requested, detect security incidents, comply with legal obligations, etc.).
- The right to correct inaccurate personal information that we hold about you.
- The right to opt-out of the “sale” of personal information or “sharing” of personal information for cross-context behavioral advertising. (However, as noted, Kyoku does not sell or share personal data in these ways, so this right is more of a formality in our case.)
- The right not to receive discriminatory treatment for exercising any of your privacy rights. We will not deny your goods or services, charge you a different price, or provide a different quality of service just because you exercised your rights, except as permitted by law (for example, if a certain feature requires personal data, we may not be able to provide that feature if you ask us to delete your data).
- The right to use an authorized agent to make requests on your behalf. If you designate an authorized agent to submit requests for you, we will take steps to verify both you and the agent, such as requiring a signed authorization or proof of identity.

How to Exercise California Rights: If you are a California resident and wish to exercise any of these rights, please contact us at our email or mailing address in the Contact section. We will verify your identity (and/or your authorized agent’s authority) as required by law before processing your request, typically by confirming information we already have on file or asking for additional information. The process and timeline will follow California regulations. If we decline any part of your request, we will explain the reasons.

You also have a right to appeal against a decision we make regarding your privacy rights request. If you wish to appeal our decision, please respond to our denial with an appeal request explaining your reasoning, and we will re-evaluate as required by relevant law. If after an appeal you are still unsatisfied, you may contact the California Attorney General or applicable authority.

Finally, California’s “Shine the Light” law permits residents to request certain information about our disclosure of personal information to third parties for their direct marketing purposes. We do not share personal data with third parties for direct marketing, so this provision is not applicable.

Additional Information for Users in Europe (GDPR)

If you are in the European Economic Area (EEA), United Kingdom, Switzerland, or a region with similar data protection laws, the following additional information applies to you. Kyoku processes personal data in accordance with the EU General Data Protection Regulation (GDPR) and applicable local laws.

Data Controller: Kyoku (or its parent company [Name of Company] if applicable) is the “data controller” of your personal information processed in relation to the Services. This means we determine the purposes and means of processing that data. If we ever process personal data on behalf of another organization (as a “processor”), such processing is not covered by this Policy (and would be subject to a separate agreement).

Legal Bases for Processing: We rely on the following legal grounds under the GDPR to process your personal information:

- **Performance of a Contract:** Much of our processing is to provide the Services that you have requested – for example, using your data to enable transactions and display your wallet information. This processing is considered necessary to fulfil our contract with you (the Terms of Service).
- **Legitimate Interests:** We process certain data as needed for our legitimate interests, in a manner that does not override your data protection rights. Our legitimate interests include securing and improving our Services, understanding how the Services are used, and communicating with you as necessary to ensure a good user experience. For instance, using analytics, preventing fraud, and sending service announcements are based on our legitimate interest in running an effective wallet service. We always consider your rights and impact on you before relying on legitimate interests.
- **Legal Obligation:** In some cases, we need to process data to comply with a legal obligation. For example, retaining certain records for tax, accounting, or regulatory purposes, or disclosing information when compelled by a court order, are processing activities based on necessity for compliance with law.
- **Consent:** Where we ask for your consent, we will process your data on that legal basis. For instance, If we seek your consent for optional analytics cookies or for sending marketing emails, we rely on consent. You have the right to withdraw consent at any time, as described in the *Your Rights and Choices* section; withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

International Data Transfers: Kyoku is operated from outside Europe (for example, our servers may be in the United States or another country). If you are in the EEA/UK, this means your personal data may be transferred to and stored in a country that is not regarded as ensuring an equivalent level of data protection as your home country. We want you to know that when we transfer personal data out of Europe, we take steps to ensure appropriate safeguards are in place. These may include:

- Relying on the European Commission's adequacy decisions (if the destination country is approved as having adequate protection).
- Using standard contractual clauses approved by the European Commission, which legally oblige the recipient to protect your data.
- Implementing additional technical and organizational measures to protect data in transit and at rest.

You can contact us to learn more about or obtain a copy of the appropriate safeguards in place for cross border transfers of your data. By using Kyoku, you understand that your personal information may be transferred to our facilities and those third parties with whom we share it as described in this Policy, which may be in countries outside of your own.

Your GDPR Rights: As an individual in Europe, you have the following rights (in addition to the core rights listed in *Your Rights and Choices* above, which include access, correction, deletion, restriction, objection, and withdrawal of consent):

- **Data Portability:** You have the right to receive your personal data that you provided to us, in a structured, commonly used, and machine-readable format, and the right to transmit that data to another controller, where technically feasible, if the processing is based on consent or contract and carried out by automated means.
- **Right to Lodge a Complaint:** If you believe our processing of your personal data is unlawful or violates your rights under GDPR, you have the right to file a complaint with your local Data Protection Authority (DPA) or

supervisory authority. We would appreciate the chance to address your concerns first, so we encourage you to contact us with any complaint, and we will do our best to resolve it. But you can go directly to your DPA. For example, if you are in the EU, you can find your DPA's contact at the European Data Protection Board's website; in the UK, you can contact the Information Commissioner's Office (ICO); in Switzerland, the Swiss Federal Data Protection and Information Commissioner (FDPIC).

We respond to all legitimate requests from individuals to exercise their data protection rights in accordance with applicable law. Please see Your Rights and Choices for how to get in touch with us to exercise these rights.

Children's Privacy

Kyoku's Services are not intended for children. We do not knowingly collect personal information from individuals under the age of 13 (and in certain jurisdictions, under 16) without parental consent. If you are under 13, please do not use Kyoku or provide any information about yourself to us. If we learn that we have inadvertently collected personal data from a child under 13, we will take steps to delete that information promptly. If you are a parent or guardian and you believe your child has provided personal information to us without your consent, please contact us so that we can investigate and address the issue.

Contact Us

We will do our best to respond promptly and help resolve any issues or answer any questions you may have about your privacy and our Services. Your feedback on privacy is welcome and helps us ensure we are upholding our principles.

Changes to this Policy

We may update or modify this Privacy Policy from time to time. If we make material changes, we will notify you by updating the "Last Updated" date at the top of this Policy and, if appropriate, provide additional notice (such as via a statement on our website or an in-app alert). We encourage you to review this Policy periodically to stay informed about how we protect your information.

Your continued use of Kyoku after any changes to this Policy constitutes your acceptance of the updated terms, to the extent permitted by law. If you do not agree with any updates or modifications, you should discontinue use of the Services.

By using Kyoku, you acknowledge that you have read and understood this Privacy Policy. We are dedicated to safeguarding your privacy and providing a secure, transparent service. Thank you for trusting Kyoku with your digital asset management.