

PRIVACY POLICY

This Website ("Website") is owned and operated by Ixian Services LLC ("Ixian").

Ixian is incorporated as part of the Próspera ZEDE but is operating with a worldwide network of builders and pioneers in various jurisdictions. The references in this Privacy Policy to "Ixian", "we" and "us" mean Ixian as the company incorporated in the Próspera ZEDE, which is solely responsible for providing services to you under the General Terms. Ixian will always act as the "data controller" with respect to your personal data, but Ixian will work with partners in various jurisdictions as well as several service providers. Your data is not stored in Próspera ZEDE.

Data protection is important to us and we adhere to high standards. This Privacy Policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us and by persons engaged by us. **Please read this in full to understand what information we will hold about you, how we may use it and what rights you have in relation to your data.** By giving us your personal information, directly or through third parties, and by using any services that we provide, you are accepting and consenting to our processing of your personal information in accordance with the practices described in this Privacy Policy, as well as our General Terms.

We may collect personal data including, but not limited to name, e-mail address, usage data, information captured through cookies (we work with Wix and integrated services and apps/dapps), and other personal information you provide as part of onboarding or which is required for compliance purposes for certain of the services provided by Ixian..

Our Website may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or their processing of your personal information.

For questions or requests related to data processing by us under this Privacy Policy (such as request for information, deletion, revocation of consent, objection to data processing), please send us an email at support@ixian.tech.

Types of Data Collected. We will not collect and process any personal data other than information or documentation provided voluntarily by you for the provision of certain services, gathered as a result of specific verifications performed by third parties based on the personal data provided by you for compliance purposes, and/or automatically collected by cookies or other tracking technologies via the Website interactions.

Use of Personal Data. We may use your data as follows:

- (1) to respond to your inquiries and correspondence, and to provide the services;
- (2) for marketing analysis purposes, in particular to improve future services;
- (3) to ensure our Website functions correctly, in particular to ensure that content from our Website is presented in the most effective manner; and
- (4) to comply with our regulatory obligations.

Legal Basis. We are allowed to process personal data under one or more of the following:

- (1) your consent for one or more specific purposes;
- (2) provision of personal data is necessary for us to provide the services;
- (3) processing is necessary for the establishment, exercise, or defense of legal claims or proceedings;
- (4) processing is necessary for compliance with a legal and regulatory obligation to which we are subject;
- (5) processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us;
- (6) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

We will clarify the specific legal basis that applies to the processing upon request, and in particular whether the provision of personal data is a statutory requirement, or necessary for the performance of the services by Ixian.

Data Processing. The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. Access to personal data is limited to those employees and/or third parties assigned with processing tasks who therefore need to know about this data. These employees and/or third parties are subject to confidentiality undertakings and/or data processing agreements and must comply with applicable data protection laws. We do not sell, transfer or market your personal data to third parties (who may use them for their own purposes). However, we may disclose your personal data to third parties and/or persons involved with operations (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies, our auditors, third parties involved in hosting or organizing events or seminars) appointed, if necessary, as Data Processors. Your data will not be disclosed to third parties for other purposes than the ones mentioned above or the following additional reasons:

- (1) you have given your express consent to it;
- (2) the disclosure is necessary to assert, exercise or defend legal claims and there is no reason to assume that you have an overriding interest worthy of protection in the non-disclosure of your data;
- (3) in the event that a legal obligation exists for the disclosure; or
- (4) this is legally permissible and necessary for the execution of our contractual relationship with you.

Our processes will generally involve transferring your personal data to and processing of your personal data by recipients in several jurisdictions. Laws and regulations relating to privacy and data disclosure, applicable to the places where your information is transferred to or stored, used or processed in by Ixian and its service providers, may not provide the same level of protection as in your place of residency.

We will retain personal data for as long as it is required to deliver the services, and/or, upon termination, as long as required by law or regulations (e.g. mandatory retention periods), whichever is longer. We may be allowed to retain your data for a longer period whenever you have given consent, as long as such consent is not withdrawn.

Security. We will take appropriate technical and organizational precautions and security measures to prevent the accidental or intentional manipulation, unauthorized access, disclosure, unauthorized destruction, partial or complete loss, misuse or alteration of your personal data. Wix processes all of the collected information on the Website. Their security measures are continuously improved in line with technical developments. You acknowledge that no technical and organizational measures can fully eliminate security risks connected with the transmission of information over the Internet.

Your Rights. You may exercise the following rights regarding your personal data:

- (1) **withdraw your consent at any time.** Please note that even after you have chosen to withdraw your consent, we may be able to continue to process your personal data to the extent required or permitted by law.
- (2) **object to processing of your data.** In those cases where we base processing on our legitimate interests, you have the right to object to the processing. You can also object to any processing of your data for direct marketing purposes at any time without providing any justification.
- (3) **access to your own data.** You have the right to learn if we are processing your data, obtain disclosure regarding certain aspects of the processing and obtain a copy of the data undergoing processing.
- (4) **verify and seek rectification.** You have the right to verify the accuracy of your own data and ask for it to be updated or corrected.
- (5) **restrict the processing of your own data.** Under certain circumstances, you can ask to restrict the processing of your own data.
- (6) **have your personal data deleted or otherwise removed.** You have the right to obtain the erasure of your own data from us, unless the processing is justified by our legitimate interests, necessary to fulfill a legal obligation, for reasons of public interest or to assert, exercise, or defend legal claims. We will take reasonable steps to inform other controllers that are processing the data that you have requested the erasure of any links to, copies or replication of it.
- (7) **receive your own data and have it transferred to another controller.** You have the right to receive your data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the data is processed by automated means and that the processing is based on your consent.
- (8) **lodge a complaint.** You have the right to bring a claim before their competent data protection authority (depending on your country of residence and the applicable data protection laws – note that in certain countries you may only notify a data protection authority which may then decide to initiate legal steps based on its own discretion). Any requests to exercise your rights can be directed to Ixian through the contact details provided in this Privacy Policy. Where possible, we will fulfill such a request within the statutory applicable timeframe, unless a delay or a retention of the relevant data is permitted by law (e.g. a lack of convincing identity proof by an information requestor), is required for another valid purpose, for example, to enable the fulfillment of contractual obligations, or is covered by a valid limitation or exemption. We reserve the right to charge for any costs.

Cookies. When you visit the Website, information can be automatically stored on your computer. This is done in the form of so-called "cookies" or a similar file, which helps us in various ways, for example, to get to know the preferences of visitors and users of the Website and to improve the Website. Both permanent cookies and functional, temporary session cookies may be used: permanent cookies remain on your computer after you close your session and until you delete them, while session cookies expire when you close your browser. Any use of Cookies – or of other tracking tools – by this Website serves the purpose of providing the services required by you, in addition to any other purposes described in this Policy, if available. You may refuse the use of any cookies by selecting the appropriate settings on your browser. Most browsers allow you to delete cookies, prevent their installation or generate a warning before a cookie is installed. You can obtain further information on this subject from the relevant browser instructions. Note, however, that this may affect your experience of our Website. We will use automatically stored information exclusively for statistical analysis and in particular will not associate any personal data unless necessary. This does not limit our use or disclosure to third parties of non-personal information, and we reserve the right to use and disclose such non-personal information to our partners and third parties at our discretion.

Changes to This Policy. We reserve the right to make changes to this Privacy Policy at any time by giving notice on the Website.