

XO Pay Privacy Policy
Last Reviewed and Updated: December 22, 2023

This privacy policy (the “Privacy Policy”) explains how Osmium LLC (“XO Pay”, “we”, “our”, and/or “us”) collects, uses, and discloses your personal information when you access our services located at xopay.ai or any other websites or content we own and operate (collectively, the “Site(s)”), or any services that link to this Privacy Policy (collectively, our “Services”).

We reserve the right to modify and amend this Privacy Policy at any time. We will post any changes to the Privacy Policy on this page, and the revised version will be effective when it is posted.

By using our Site or Services, you agree to the collection, use, and disclosure of your personal information as described in this Privacy Policy. Furthermore, you acknowledge that such use is also subject to our Terms of Service.

PERSONAL INFORMATION WE COLLECT

Information You Provide To Us

We collect personal information that you provide to us. This includes information that you provide to us to access the Services. This information may include:

- Identification Information such as full name, email address, phone number, and social security number or other government-issued identification number.
- Financial Information such as your credit card number, expiration date and CVV, or your bank account information.
- Transaction Information such as your blockchain transaction history, wallet address, and other information associated with your linked cryptocurrency wallet as well as information relating to or needed to complete your transactions.
- Correspondence such as information you provide through our support channel or via any survey responses and feedback.
- Marketing Information such as your preferences for receiving our marketing communications.
- Other information not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Information We Collect Automatically

We, our service providers, and our business partners may automatically collect information about you and your devices when you use the Site or Services. This information may include:

- Usage Data, such as pages you view and how long you view them, the dates and times that you visit the Site or Services, the hyperlinks you click on, and other data collected via cookies and other technologies.
- Online Identifiers, such as IP address, web browser information, operating system, and geolocation details.
- Communication Interaction Information, such as interactions with our emails or other communications (e.g., whether you open and/or forward emails).

For more information concerning our automatic collection of data, please see the Tracking Technologies section below.

Information Collected From Third Parties

We may obtain information about you from third party sources when you utilize our Services, such as:

- Identity Verification Vendors: These third parties assist us in verifying your identity and may provide us with information about you, such as your full name, date of birth, physical address, SSN, phone carrier, status on any sanction lists and other relevant data.
- Outreach and Marketing Partners: This is to better serve you updates related to our Services and relevant marketing materials.
- Blockchain Data: We collect blockchain data collected from public sources and third parties such as transaction IDs and blockchain addresses, as well as other relevant data.

Tracking Technologies

We and our third-party service providers may collect information using cookies, pixel tags, or other technologies. Our third party service providers, such as analytics, advertising, identity verification and/or risk analysis partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent

cookie remains after you close your browser and may be used by your browser on subsequent visits to our Site and/or Services.

Our Website uses the following types of cookies for the purposes described below:

- Functional Cookies: We use functional cookies to recognize you when you return to our Site and/or Services to ensure a better experience.

- Analytics and Performance Cookies: We use analytics and performance cookies for website analytics purposes to operate, maintain, and improve the Site and Services. The information gathered by these cookies is aggregated and anonymized and does not identify any specific individual visitor. We use Google Analytics to collect and process certain analytics data on our behalf. Google Analytics uses its own cookies that help us understand how you engage with the Site and Services and may also collect information about your use of other websites, apps, and online resources. The links below provide additional information and resources for Google Analytics:
 - [Google Analytics](#)
 - [Prevent the Use of Google Analytics in Connection with your use of our Services](#)

- Advertising Cookies: We may allow third party advertising partners to use cookies on the Site and/or Services to collect information about your browsing activities over time and across websites.

- Fraud Prevention: We may allow third party service providers to collect persistent cookies for fraud detection and prevention purposes.

Further information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org.

You can block cookies by setting your internet browser to block some or all of the cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site and Services. You can change your browser settings to block or notify you when you receive a cookie, delete cookies or browse our Site using your browser's anonymous usage setting. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings. If you do not agree to our use of cookies or other technologies which store information on your device, you should change your browser settings accordingly. You should understand that some features of our Site or Services may not function properly if you do not accept cookies or these technologies. Where required by applicable law, you will be asked to consent to certain cookies and other technologies before we use or install them on your computer or other device.

Additionally, we use chat technologies, such as those provided by Intercom, Inc. ("Intercom") that employ cookies and software code to operate the chat features that you can use to communicate with us through the Service. Intercom and other third parties may access and use

information about webpages visited on our website, your IP address, your general geographic information (e.g., city, state), and other personal information you share through online chats for the purposes described in this Privacy Policy.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

- To Provide the XO Pay Services, such as to provide our Services to you, to enable security features of the Service, to communicate with you about the Service (including by sending announcements and updates), to provide support for the Service (including customer support), and to respond to your comments and questions.
- To Comply with Applicable Laws and Other Compliance Purposes, such as complying with applicable laws, lawful requests, and legal process (such as comply with anti-money laundering laws, sanctions requirements, and to respond to subpoenas), to verify your identity and/or manage risk, to detect and prevent fraud, security incidents, malicious, deceptive or illegal activity, and abuse of our Services, and to enforce the terms and conditions that govern the Service.
- For Marketing and Advertising Purposes. We, our service providers, and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:
 - For direct marketing purposes. We may send you direct marketing communications and may personalize these messages based on your needs and interests.
 - For advertising purposes. We and our third-party advertising partners may use cookies and other technologies to collect information about your interaction with the Site and Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms.
- For Other Legitimate Business Purposes, such as:
 - To provide, maintain, debug, improve and enhance our Site and Services.
 - To understand and analyze how you use our Site and Services, improve our business, and develop new products, services, features, and functionality.
 - To personalize your experience on our Site or Services such as identifying you as a repeat visitor or maintaining your account settings.
 - To facilitate the connection of third party services or applications.
 - To create anonymized, de-identified or aggregated data, which we may use and share for our lawful business purposes, including to analyze and improve our Services and promote our business.

- To contract with third-party API providers, including providing customer service, verifying customer information, providing advertising or marketing services, providing analytic services or providing similar services on behalf of the business or service provider.
- Further Uses. In some cases, we may use your personal information for further uses, in which case we will ask for your consent to use your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

HOW WE SHARE THE PERSONAL INFORMATION WE COLLECT

We may share your personal information with the following categories of third parties or as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection:

- Affiliates: We may share any information we receive with our affiliates and corporate parent for any of the purposes described in this Privacy Policy.
- Payment Processor: Our third-party financial services providers, such as Worldpay (UK) Limited, Worldpay Limited, Worldpay AP LTD, and Worldpay, LLC (collectively, “Worldpay”) and Coinme Inc. (“Coinme”), process payments and transactions that you have initiated through the Services. Any payment information you provide on the Service is collected and processed directly by our payment processors, such as Worldpay and Coinme. Worldpay and Coinme may use your personal information in accordance with their privacy policies, available at <https://www.fisglobal.com/en/privacy> and <https://coinme.com/privacy/>, respectively.
- Identity Verification Services: We partner with third party providers, such as Coinme and SardineAI Corporation (“Sardine”), to confirm your identity, conduct anti-money laundering and sanctions compliance screens, and help prevent fraud. Coinme and Sardine may use your personal information in accordance with their privacy policies, available at <https://coinme.com/privacy/> and <https://www.sardine.ai/privacy-policy>, respectively.
- Vendors and Service Providers: We may share your information with vendors and service providers retained in connection with the provision of our Services, such as hosting, information technology, customer support, email delivery, marketing, consumer research, and website analytics.
- Advertising Partners: We may share your personal information with third party advertising companies for the interest-based advertising purposes described above.

- Companies In Connection With Business and/or Asset Transfers: We may transfer your personal information to third parties in connection with the consideration, negotiation, or completion of a corporate transaction, such as where we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets.
- Law Enforcement, Regulators or Other Similar Third Parties When Compelled: We may access, preserve, and disclose your personal information if we believe doing so is required or appropriate to: (i) comply with applicable laws; (ii) respond to law enforcement requests and legal process, such as a court order or subpoena; or (iii) protect the rights, property, and safety of XO Pay, our employees, agents, customers, and others, including to enforce our agreements, policies, and Terms of Service.
- Third Parties with Consent: We also may disclose your personal information with your consent.

SECURITY OF PERSONAL INFORMATION

We employ measures designed to protect personal information. However, as no electronic transmission or storage of personal information can be entirely secure, we can make no guarantees as to the security or privacy of your personal information. Please note that you also play an important role in protecting your own personal information so when registering with our Services, please use a strong password and don't reveal it to third parties. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us at data@xopay.ai.

RETENTION OF PERSONAL INFORMATION

We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

THIRD PARTY SERVICE PROVIDERS

Our Site and Services may contain links or API connections to other websites, products, or services that we do not own or operate. We are not responsible for the privacy and advertising practices of these third parties. Please be aware that this Privacy Policy does not apply to your

activities on these third party service providers or any personal information you disclose to these third parties. We encourage you to read their privacy policies before providing any personal information to them.

DO NOT TRACK SIGNALS

Some internet browsers may be configured to send "Do Not Track" signals to the online sites that you visit. There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals. To find out more about "Do Not Track," please visit www.allaboutdnt.com.

YOUR RIGHTS AND CHOICES

Access or Update Your Information

You may update certain information that we process about you by contacting us.

Marketing Communications

You may unsubscribe from our promotional emails via the link provided in the emails. Even if you opt out of receiving promotional messages from us, you will continue to receive important administrative and service-related messages from us.

Contact Information

If you have questions about your privacy related to the Site or Services or this Privacy Policy, you may contact us at the address below.

Osmium LLC
15418 Weir Street, No. 333
Omaha, NE 68137
data@xopay.ai