# **XPLUS Privacy Policy**

PRIVACY NOTICE
Last updated April 28, 2023

This Privacy Policy for XPLUS GLOBAL Ltd. (doing business under the “X-Wallet” brand name) (“X-Wallet,” “we,” “us,” or “our”), describes how and why we might collect, store, use, and/or share (“process”) your information when you use our services (“Services”), such as when you:
1. Download and use our mobile application (X-Wallet),
2. Other Service of ours that links to this privacy notice.

Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please refrain from using the X-Wallet. If you still have any questions or concerns, please contact us at marketing@xplus.com

## **SUMMARY OF KEY POINTS**

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

How do we store collected personal information? Personal information is collected, and immediately being strongly encrypted in the XPLUS servers’ databases,  so only users have their personal decryption keys to decrypt their own records .

Under no circumstances the XPLUS team can decrypt the users data or access users’ personal information, including emails, contacts, cloud storage accounts, biometry etc.

What personal information do we process? X-Wallet account creation and back up requires you to submit your email, personal cloud storage account email, and biometry in the form of face scan. When you visit, use, or navigate our Services, we may process some personal information in anonymous form, measuring overall user experience and interaction with X-Wallet and the services, user flow in Product navigation, and the functions and features you use for Product and Services improvement purposes.

Do we process sensitive information? We do not process sensitive personal information, including KYC, account balance information, transaction history, or connections between accounts, deposits, and on-chain transfers between the users in the X-Wallet.

How do we process your information? We process your information to provide, improve, and administer our Services, for security and fraud prevention. We may also process your information for other purposes with your consent. Under no circumstances XPLUS team has responsibility for any users’ activities, including but not limited to check-up on sending and receiving addresses, amounts, selection of the corresponding blockchain and third-party service provider etc., as well as eligibility of the users’ to store their digital assets or to make the transactions. The responsibility for storing digital assets and sending them on-chain lies on the user, including compliance with the regulations.

In what situations and with which parties do we share personal information? We do not receive any information from third parties. We refrain from exchanging personal users’ contact or other information with third-party individuals, companies or organizations. We may need to ask for some of your personal information after receiving a clear consent, we may share your on-chain deposit address or similar form of contact substitute in connection with, or during promotional campaigns, rewards and other digital asset distribution.

How do we keep your information safe? We have organizational and technical processes and procedures in place to protect your personal information, including strong encryption, rotating encryption protocols, distributed, separated and protected data vaults, protected internet connection, and other security measures. However, no electronic data transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to collect or process some of the information that is being exchanged with other service providers.

What are your rights? You have a right to review, change, or terminate your account at any time.

How do you exercise your rights? The easiest way to exercise your rights is by selecting related options in the Product settings, and by contacting us directly. We will consider and act upon any request in accordance with applicable data protection laws.

****End of Summary****

## **1. WHAT INFORMATION DO WE COLLECT?**

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register a new X-Wallet Account and use our Services, express an interest in obtaining information about us or our Products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the Product functions and  features you use. The personal information we collect may include the following:

Product-related:

* email address;
* personal cloud storage email address;
* face scan biometry in the form of mathematical model of main facial features;
* services you used while using X-Wallet.

Promo activities-related:

* social media account handles/nicknames;
* on-chain deposit addresses;
* Web3 domain names;
* third-party service account handle/nicknames;
* rewards distributed during the promo activities.

Customer support-related:

* Contacts;
* Issue record and supporting technical information.

Sensitive Information. We do not process sensitive information, such as KYC or Account balance.

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

Mobile Device Data. We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model, Internet service provider and/or mobile carrier.

If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device’s operating system or platform, the type of mobile device you use, your mobile device’s unique device ID, and information about the features of our application(s) you accessed.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analystics and reporting purposes.

## **2. HOW DO WE PROCESS YOUR INFORMATION?**

In Short: We process your information to provide, improve, and administer our Product and Services, for security and fraud prevention. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

* To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.

Personal information is collected and immediately being strongly encrypted in the XPLUS servers’ database, with only a few appointed key team members having access to the decryption keys. Decrypting any information is only possible in emergency situations, such as restarting new XPLUS servers after a hacker attack or force majeure, financial abuse, criminal case, hacker attack investigation, and law enforcement.

## **3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?**

In Short: We only process your personal information with your consent, when we believe it is necessary and we have a valid legal reason to comply with laws, to provide you with services to enter into or fulfill our obligations, to protect your rights, or to fulfill our legitimate business interests.

The General Data Protection Regulation (GDPR) requires us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

Consent. We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.

Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

* For investigations and fraud detection and prevention;
* If we have reasonable grounds to believe an individual has been, is, or may be a victim of hacker attack or financial abuse.
* If the information is publicly available and is specified by the regulation.

## **4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

In Short: We may share information in specific situations described in this section and/or with the following third parties.

We do not receive any information from third parties. We refrain from exchanging personal users’ contact or other information with third-party individuals, companies or organizations.

We may need to ask some of your personal information in the following situations:

After receiving a clear consent, we may share your deposit address or similar form of contact substitute in connection with, or during promotional campaigns, rewards and other digital asset distribution.

## **5. HOW LONG DO WE KEEP YOUR INFORMATION?**

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice. No purpose in this notice will require us to keep your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal anonymized information, we will either delete such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information in encrypted form and isolate it from any further processing until deletion is possible.

## **6. HOW DO WE KEEP YOUR INFORMATION SAFE?**

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process.

Personal information is collected and immediately being strongly encrypted in the XPLUS servers’ database, with only a few appointed key team members having access to the decryption key. Decrypting any information is only possible in emergency situations, such as restarting new XPLUS servers after a hacker attack or force majeure, financial abuse, criminal case, hacker attack investigation, law enforcement etc.

However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able improperly collect, access, or steal your information that is being exchanged with other third-party service providers. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the XPLUS Services within a secure environment. XPLUS has limited responsibility regarding loss of information caused by third-party service providers.

## **7. DO WE COLLECT INFORMATION FROM MINORS?**

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent’s use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to promptly and strictly limit access to such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at marketing@xplus.com

## **8. WHAT ARE YOUR PRIVACY RIGHTS?**

In Short: In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Canada, you have rights that allow you greater access to and control over your personal information. We extend these rules to the users from other regions as well. You may review, change, or terminate your account at any time.

In some regions (like the EEA, UK, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information.

We will consider and act upon any request in accordance with applicable data protection laws.

Withdrawing your consent: We are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law; you have the right to withdraw your consent at any time.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

Choose related options in Product settings and contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

If you have questions or comments about your privacy rights, you may email us at marketing@xplus.com

## **9. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## **10. DO WE MAKE UPDATES TO THIS NOTICE?**

We may update this privacy notice from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## **11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may email us at info@xplus.com or by post to:

XPLUS GLOBAL PTE. LTD. (w.e.f.23/12/2021)

7500A BEACH ROAD

#11-318/9 THE PLAZA

199591

## **12. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

You have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please submit a request in the XPLUS application and send a confirmation email including your email address used to register a XPLUS account at contact info@xplus.com