

Privacy Notice

Last Updated: 03.11. 2025

Trady One Inc., a company duly incorporated and registered under the laws of the Republic of Panama, company number 155775103, with registered address: Torre Advanced Building, first floor, Ricardo Arias Street, Panama, Republic of Panama, its affiliates, and subsidiaries (collectively, “**Trady**,” “**we**,” or “**us**”) are pleased to provide to visitors or users (hereinafter, “**visitor**,” “**user**,” “**you**,” or “**your**”) certain websites, software, applications, content, products, and services, which are part of our dApp (collectively, “**Trady Interface**”).

PLEASE READ THIS PRIVACY NOTICE CAREFULLY BEFORE PROVIDING ANY OF YOUR PERSONAL DATA OR USING THE TRADY INTERFACE. THIS PRIVACY NOTICE GOVERNS THE PROCESSING OF YOUR PERSONAL DATA BY US IN GENERAL. BY CONSENTING AND PROVIDING US WITH YOUR PERSONAL DATA TO USE THE TRADY INTERFACE, YOU AGREE TO BE BOUND BY THIS PRIVACY NOTICE (also Notice).

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1. Scope of this Privacy Notice

- a. This Notice describes the processing of Personal Data (any information related

to an identified or identifiable living individual) provided or collected on the websites and applications where this Notice is posted (or which link to this Notice). We follow this Notice in accordance with applicable law in the places where we operate. Sometimes, we may provide additional privacy notices specific to certain products, practices, or regions. Our Terms & Conditions are to be read in conjunction with this Notice.

b. Please keep in mind that our website (which shall mean the websites **trady.xyz**) and application (available in the near future) may contain links to other websites not owned or controlled by us, and we are not responsible for the privacy practices of those websites. We encourage you to be aware when you leave our Website or application and to read the privacy policies of other websites that may collect and process your Personal Data.

c. This Notice applies to the following people:

i. people who use the **Trady Interface** (for this Notice, we define the terms “visitor,” “user,” “you,” “your,” and “yours” as a person who has access to the **Trady Interface**);

ii. people who make complaints to us by email.

d. We do not sell your Personal Data to third parties. A “**sale**” of Personal Data under the CCPA is defined broadly to include the “selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means” of the Personal data of a consumer to another business or third party “for monetary or other valuable consideration.” If we decide to sell the business or **Trady Interface**, we will inform you about this so you can forbid us from transferring your Personal Data along with our business. If so, we will delete your Personal Data from the databases prior to a business transfer.

2. Responsible Person (“Data Controller”)

a. Unless we tell you otherwise in an individual case, the responsible person for processing your Personal Data under this Privacy Notice (“Data Controller”) is:

b. **Trady One Inc.**, a company duly incorporated and registered under the laws of the Republic of Panama, with company number 155775103, and registered address: Torre Advanced Building, first floor, Ricardo Arias Street, Panama, Republic of Panama.

3. Principles of Data Processing

a. According to the best worldwide privacy practices, we adhere to the following principles to protect your privacy:

i. **principle of lawfulness, fairness, and transparency**—we process Personal

Data lawfully, fairly, and transparently concerning the data subject;

ii. **principle of purpose limitation**—we collect Personal Data for specified, explicit, and legitimate purposes and do not further process it in a manner that is incompatible with those purposes;

iii. **principle of data minimization**—we collect adequate Personal Data, relevant and limited to what is necessary concerning the purposes for which we process Personal Data;

iv. **principle of data accuracy**—we keep Personal Data accurate and, where necessary, keep it up to date. We take every reasonable step to ensure that inaccurate Personal Data, having regard to the purposes for which they are processed, is erased or rectified without delay;

v. **principle of storage limitation**—we keep Personal Data in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the Personal Data are processed;

vi. **principle of integrity and confidentiality**—we process Personal Data in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage, using appropriate technical or organizational measures.

4. Types of Personal Data

a. To fulfill our obligations on the provision of a license for **Trady Interface** for you, we will collect and process such Personal Data about you (but not limited to):

i. Wallet addresses (public blockchain addresses) that are accessible when interacting with the Trady Interface; we use public blockchain addresses to identify a user's journey through our product. We do not use this data for any purpose at an individual user level. Note that we are not responsible for your use of any of the blockchain and your data processed in these decentralized and permissionless networks;

ii. Email Address. By accepting and providing us your email address for marketing purposes via the Trady Interface, you provide us consent to do so.

b. To make things easier for you, you may be able to use your account credentials with X as a third-party service to get access to the Trady Interface. By doing so, you acknowledge that some X account information may be transmitted into the Trady Interface and that such X account information transmitted to the Trady Interface is covered by this Privacy Notice.

c. We may collect Personal Data from you in various ways and circumstances, including, but not limited to, accessing the **Trady Interface**, a subscription to a newsletter, filling out a form (which may be of a different kind), responding to marketing emails sent to you, and collecting Personal Data contained in collected/used online identifiers and providing feedback. We shall be entitled to combine Personal Data collected during your interaction with different sections on the **Trady Interface**.

with any other relevant information.

5. Personal Data Collected in an Automated Way

a. We may also automatically collect data about the devices you use to interact with the **Trady Interface**. Personal Data is automatically collected by or transmitted to us in the course of accessing, interacting, and/or operating **the Trady Interface** and may include, without limitation, the following Personal Data:

- i. device information, which may include (but is not limited to) information about the personal computer or laptop you use to access **Trady Interface**, including the hardware model, operating system and version, **Trady Interface** you use, and other device identifiers;
- ii. server log information, which may include (but is not limited to) your login details, the date and time of visits, the pages viewed, your IP address, and time spent at **Trady Interface**;
- iii. information collected by cookies and other similar technologies. We and our service providers may use various technologies to collect information when you interact with **the Trady Interface**, including cookies and other similar technologies (such as localStorage). localStorage is a small data file that is stored on your device when you visit the Website, which enables us to collect information about your device identifiers, IP address, web browsers used to visit the Website, pages or features viewed, time spent on the Website, and links clicked. Where required, you will be asked for consent to our use of localStorage.

6. Use of Your Personal Data by Trady Interface

a. We may use your Personal Data for various purposes, primarily for providing information about and providing **the Trady Interface**. We may also use the Personal Data for other purposes as otherwise allowed by law. We may use your Personal Data for such purposes, including, but not limited to:

- i. provide license and access to **Trady Interface**;
- ii. ensuring compliance with the agreements with users;
- iii. provide a more significant and better experience with the **Trady Interface**;
- iv. detect, investigate, and prevent illegal activities or conduct that may violate the Terms & Conditions of **Trady Interface** and this Privacy Notice;
- v. for fraud protection, security, and bug-fixing activities;
- vi. personalize your experience with **Trady Interface** or display content that we believe will be of interest to users;
- vii. contact you concerning, and conduct surveys or polls you choose to take part in, and analyze the data collected for market research purposes;
- viii. conduct internal research and development and improve, test, and enhance the features and functions of **Trady Interface**;
- ix. respond to users' correspondence, contact users when necessary and/or upon

their request, and/or send them information about **Trady Interface**;

x. send emails and other communications in accordance with the user's preferences;

xi. for marketing and promotion of **Trady Interface** or related products, including those of a third party that are related to **Trady Interface**;

xii. meet our internal and external audit requirements, including our information security obligations;

xiii. tracking usage data;

xiv. protect our property rights or those of users or third parties;

xv. respond to claims that publications or other content violate the rights of third parties;

xvi. interact with public blockchain data (analysis of wallet addresses and transactions in order to provide users with access to features of **Trady Interface**);

xvii. any other purpose as we determine, at our sole discretion, to be necessary or required to ensure the safety and/or integrity of our users, employees, third parties, the public, and/or **Trady Interface**, or to comply with requirements of any applicable law.

7. Consent to Personal Data Processing

a. **Consent to Personal Data Processing.** By providing you with Personal Data and using the Trady Interface, you approve that you are solely responsible for all your actions and fully understand the statements outlined in this Privacy Notice.

b. By transferring to us your Personal Data via the **Trady Interface** or otherwise, you irrevocably and unconditionally consent and agree that we shall be entitled, in accordance with this Notice:

i. to process in any manner, including to collect, store, use, disclose, share, and transfer (including cross-border), your Personal Data so provided to us, as well as your Personal Data collected from your use of **Trady Interface** (i.e., your Personal Data which we collect automatically and/or from other sources); and

ii. to use cookies, web beacons (pixel tags), and other similar technologies (such as localStorage) to collect your Personal Data.

8. Compliance with Data Protection Laws in Applicable Jurisdictions

a. If you are located in California, all Personal Data processing is performed per the regulations and rules following the [California Consumer Privacy Act](#), Cal. Civ. Code § 1798.100 et seq. (“CCPA”).

b. If you are located in the United Kingdom, all Personal Data processing is performed per regulations and rules following the [Data Protection Act 2018](#) (“DPA 2018”).

c. The relevant data protection law will apply if you are located in another country

or territory.

9. Your Privacy Rights

a. Your privacy rights include the following:

i. **The Right to Access.** You may contact us to get confirmation as to whether or not we are processing your Personal Data. When we process your Personal Data, we will inform you of what categories of Personal Data we process regarding you, the processing purposes, the categories of recipients to whom Personal Data has been or will be disclosed, and the envisaged storage period or criteria to determine that period;

ii. **The Right to Restriction of the Processing.** You have the right to obtain from us restriction of processing of your Personal Data, as foreseen by applicable data protection law, e.g., to allow our verification of the accuracy of Personal Data after you contest the accuracy or to prevent us from erasing Personal Data when Personal Data is no longer necessary for the purposes but still required for your legal claims or when our processing is unlawful. Restriction of processing may lead to fewer possibilities to use the **Trady Interface**;

iii. **The Right to Data Portability.** You have the right to receive your Personal Data from us in a structured, commonly used, and machine-readable format and to independently transmit these data to a third party, in case our processing is based on your consent and carried out by automated means;

iv. **The Right to Complain.** You have the right to complain about our data processing practices by contacting us via s@trady.xyz.

v. **How to Use These Rights.** To exercise any of the above-mentioned rights, you should primarily use the functions offered by the Website or otherwise via **the Trady Interface**. If such functions are insufficient for exercising such rights, you shall send us a letter or email to the address set out below under the Privacy Notice, including the following information: name and email address. We may request additional information necessary to confirm your identity. We may reject unreasonably repetitive, excessive, or manifestly unfounded requests.

10. Data Storing and Deletion

a. We store your Personal Data for as long as needed to provide you with the **Trady Interface**. We may store Data longer, but only so that it cannot be traced back to you. When Personal Data is no longer needed, we delete it using reasonable measures to protect it from unauthorized access or use.

b. **Storing Rules Dependence.** Storing might differ depending on the territory of collecting the Data and the applicable legislation, but we always strive to store the information only as long as it is needed to provide, improve, or personalize **the Trady Interface**.

11. Data Security

a. **We care to ensure the security of Personal Data.** We follow generally accepted industry standards to protect the information submitted to us, both during transmission and after receiving it. We maintain technical, physical, and administrative security measures to provide reasonable protection for your Personal Data. When we or our contractors process your Data, we also make sure that your Data is protected from unauthorized access, loss, manipulation, falsification, and destruction, or unauthorized disclosure. This is done through appropriate administrative, technical, and physical measures.

b. By accepting this Privacy Notice, you confirm that you understand and acknowledge that there is no 100% secure method of transmission over the Internet or method of electronic storage. Therefore, we cannot guarantee its absolute security.

c. **Specific Categories of Data.** **Trady Interface** does not seek to collect sensitive personal data (racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data, a person's sex life, or sexual orientation) from any user. Please, do not share with us any sensitive personal data if you don't want us to collect it.

12. Cookies

a. We use a browser feature known as a “**cookie**,” which assigns a unique identification to your device. Cookies are data files that can hold small amounts of information and are stored on your device (computer, smartphone, etc.) when you first visit a Website. Information collected from cookies is used by us to evaluate the effectiveness of our Website, analyze trends, and administer the Website.

b. The information collected from cookies allows us to determine such things as which parts of our Website are most visited and the difficulties our users may experience in accessing our Website. With this knowledge, we can improve the quality of your experience on the Website by recognizing and delivering more of the most desired features and information, as well as by resolving access difficulties.

c. We also use cookies and/or a technology known as web bugs or clear GIFs, which are typically stored in emails to help us confirm your receipt of and response to our emails and to provide you with a more personalized experience when using our Website.

d. We use a third-party service provider(s) to assist us in better understanding the use of our Website. Our service provider(s) will place cookies on the hard drive of your computer or other device and will receive information that we select that will educate us on such things as how users navigate around our Website, what products are browsed, and general transaction information. Our service provider(s) analyze this information and provide us with aggregate reports.

e. The information and analysis provided by our service provider(s) will be used to assist us in better understanding our users' interests in our Website and how to better serve those interests. The information collected by our service provider(s) may be linked to and combined with information we collect about you while you use the Website. Our service provider(s) is/are contractually restricted from using information they receive from our Website other than to assist us.

f. We use cookies when you visit our Website, but you can control these through your browser settings. Unfortunately, in most cases, there are no industry-standard options for disabling cookies without completely disabling the functionality and features they add to our Trady Interface. You may control the cookies through the browser settings. Find out how to manage cookies on browsers:

- i. [Google Chrome](#)
- ii. [Mozilla Firefox](#)
- iii. [Apple Safari](#)

g. Cookies are used on the Website.

i. **Marketing Cookies.** Marketing Cookies (also known as advertising cookies/tracking cookies) remember your preferences for services, products, and web pages, and generally that you have visited the Website. We aim to provide you with advertising that is relevant to you and your interests on other online platforms, where possible, based on your visits and actions on our Website and other third-party websites. Based on these interests, we develop a segmented profile and then customize the content and advertising on our Website for different customer groups.

ii. **Statistics Cookies.** Statistics Cookies/Performance Cookies collect information about how you use our Website. They aim to identify your browser, operating system, the websites visited, and the duration and number of visits to the website, as well as to identify and remember if you are already registered on our website, and whether to show certain notifications that might only be valid to the subscribed or unsubscribed users. The information collected serves the purpose of evaluating and improving the usability of our Website.

iii. **Strictly Necessary Cookies.** These cookies are required to navigate our Website and to operate the basic functions of the Website. Examples of strictly necessary cookies are cookies to remember your cookie preferences, to access secure areas of the Website, or to remember your orders and order payment status between pages of the Website. Without these cookies, certain basic functions cannot be offered. Strictly Necessary Cookies are always active and will be placed without your consent. These cookies cannot be disabled.

iv. **Preference Cookies.** These cookies allow websites to remember choices you have made (such as your language or the region you are located in, or your preferences according to surveys and questionnaires) and provide more advanced personalized features. These Cookies cannot track your activity on other websites. They do not

collect any information about you that can be used to advertise to you or remember where you have been on the Internet outside of our Website.

v. **Third-Party Cookies.** We use cookies set by a third-party domain (not by our Website) (third-party cookies). Some third-party services that we use to improve the performance of our Website may place their own cookies on your browser/device. Our Privacy Notice applies only to the use of cookies by us and not to the use of third-party cookies by third parties. Such third-party services place their own cookies:

vi. Google Analytics. We use **Google Analytics** to create detailed statistics of the Website and **Trady Interface** users. The statistics are collected on Google's server; the user only places JS code on the pages of his or her website. The tracking code is triggered when the user opens the page in his or her web browser. Personal Data collected: Cookies and Usage Data. For more information on Google Analytics' privacy practices, please visit the [Privacy Policy](#).

vii. Meta Pixel. We use **Meta Pixel**, which uses the data collected to track and analyze the use of our Website, prepare reports on its operation, and share them with other Meta services. Meta Pixel may use the Personal Data collected to contextualize and personalize the advertising of its own advertising network. Personal Data collected: Cookies and Usage Data. Place of processing: USA—[Privacy Policy](#).

13. Contractors

a. Third-Party Service Providers. We work with third-party service providers who provide website, application development, hosting, maintenance, and other services for us. These contractors may have access to or process Personal Data on our behalf as part of providing those services for us. We limit the information provided to such service providers to the extent that is reasonably necessary for them to perform their functions.

b. Other Permitted Disclosure. We may share your Personal Data with our insurers and our professional advisors (lawyers, bankers, auditors, corporate financiers, brokers, etc.), as well as our employees and other personnel in connection with the services/work they provide to us. If we share your Personal Data with those processors, we will require the recipient to keep it confidential and secure. To provide you (or your organization) with **the Trady Interface**, we may provide Personal Data to the courts, lawyers advising the other parties to a matter, or other professionals (such as overseas law firms, patent agents, forensic accountants, or barristers).

14. Children's Privacy

a. The **Trady Interface** is not intended for use by children under the age of 18. We do not intentionally collect or maintain information from persons under the age of 18.

b. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 18, we will make reasonable efforts to delete such information from our records.

c. We also recommend that parents monitor their children's Internet activities and learn and employ software or other tools to help their children enjoy their online experience without compromising their personal safety or allowing them to use the Internet in a manner inconsistent with their parents'/guardians' preferences.

15. Application of this Privacy Notice

a. This Privacy Notice applies to the Website. Once redirected to another website or application, this Notice is no longer applicable.

16. Acceptance of this Notice

a. We assume that all visitors and users have carefully read this document and agree to its content. If one disagrees with this Privacy Notice, they should not use this Website and the **Trady Interface** accordingly.

17. Changes and Updates

a. From time to time, we may update this Privacy Notice. We encourage you to periodically check back and review this Privacy Notice so that you always know what data we collect, how we use it, and with whom we share it.

b. Our updated Privacy Notice will be effective upon posting to the Website or otherwise via the **Trady Interface**. Your continued access to or use of the Website or **Trady Interface**, accordingly, is considered your acceptance of the updated Privacy Notice.

18. CONTACT US!

a. If you have any questions, suggestions, or comments, please contact us via email at s@trady.xyz.