

Privacy Policy

We highly prioritize the safeguarding of your personal information. Your personal data is handled with the utmost confidentiality and in compliance with the current legal data protection regulations, as detailed in this privacy policy ("Privacy Policy").

The Privacy Policy outlines how Moon Soon Labs PTE. LTD., a company limited by guarantee and incorporated in Singapore with its registered address at 105 CECIL STREET #12-02 THE OCTAGON SINGAPORE 069534, collects, processes, shares, and stores the personal data of users engaging with our websites, software, and services. It also clarifies your privacy rights and how you are protected under the law. This Privacy Policy is applicable to websites, applications, products, and services where it is posted, linked, or mentioned. PLEASE REFRAIN FROM USING ANY OF THE SERVICES IF YOU DO NOT ACCEPT ANY PART OF THIS PRIVACY POLICY OR OUR TERMS OF USE.

When you share your personal data with us, you consent to its collection, processing, and disclosure in accordance with this Privacy Policy. If you are sharing personal data of another person, it implies that you have informed them about the purposes for which we need their personal data and they have consented to us collecting, using, and disclosing their personal data as per this Privacy Policy.

For any questions or if you wish to exercise your privacy rights, please reach us at support@moonsama.com

Collection, Use and Disclosure of Personal Data

Moonsama Labs PTE. LTD. retains exclusive ownership of the information gathered on our websites (<https://moonsama.com>) and through the use of our software. We only access and collect personal data that you consciously provide to us via email or other direct points of contact. Personal data encompasses any information that can be used to identify an individual, excluding data from which the identity has been removed (also referred to as anonymous data).

We gather a diverse range of personal data about our customers and visitors when you disclose it to us or use our services. This personal data can be classified into the following categories:

Information You Give Us

The types of personal data we may gather from you include:

- Identity Data: This could include your title, first name, last name, username, or other similar identifiers.
- Contact Data: This includes details like your billing address, company address, email address, and phone numbers.
- Financial Data: This pertains to information such as your payment card details.
- Transaction Data: This includes details about network transactions associated with your accounts.
- Feedback and Correspondence Data: This category consists of information you provide in your responses to our surveys, during participation in our market research activities, when reporting a service-related problem, during customer support interactions, or other types of correspondence with us.
- Usage Data: This includes data regarding your interaction with our website and services.
- Marketing and Communications Data: This comprises your preferences in terms of receiving direct marketing from us and your communication preferences.

Information We Get From Others

We might gather additional personal data about you from third-party sources, and this information could be integrated with the personal data we gather from your usage of our websites, software, and services. The kind of personal data collected may include:

- Technical Data: This comprises your internet protocol (IP) address, browser type and version, time zone settings and location, browser plugin types and versions, operating system, platform, and other technological elements related to the

devices you use to access our website.

- **Tracking Data:** This includes information collected about you from cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers.

We may employ cookies, local storage, or analogous technologies to analyze patterns, manage the website, track users' movements around the website, and gather demographic data about our user base as a whole. Users can manage the use of cookies and local storage at the individual browser level.

Data We Won't Request

We will never request that you share your private keys or wallet seed. Please be vigilant and distrust any individual or website that asks for your private keys or wallet seed. We do not gather any Special Categories of Personal Data (which includes particulars about your race or ethnicity, religious or philosophical convictions, sexual life or orientation, political viewpoints, union membership, health information, and genetic or biometric data). We also refrain from collecting any data related to criminal convictions and offences.

Consideration for Aggregated and Anonymized Data

The definition of 'personal data' doesn't encompass data that cannot be used to identify you. For instance, we might develop aggregated and anonymized data (such as statistical or demographic data for our internal use) that won't directly or indirectly expose your identity. We might aggregate your personal data to calculate the percentage of users accessing a specific feature on our platform, improve our services, identify trends, develop new services, and so forth. However, if we merge or connect aggregated data with your personal data in a way that it can directly or indirectly identify you, we will treat the combined data as personal data and handle it in accordance with this Privacy Policy.

Consequences of Not Providing Your Personal Data

Your Personal Data is crucial for us to deliver our services to you and/or fulfill our contractual obligations towards you. If you don't provide such personal data, it may hinder our ability to offer you the services you intend to receive.

Personal Data

To Provide Services

We will use your personal data in the following ways:

- To enable you to access and use our websites, products, and services.
- To provide and deliver products and services that you may request.
- To send information, including confirmations, technical notices, updates, security alerts, and support and administrative messages.
- To comply with the law.

We use your personal data as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal processes, such as to respond to subpoenas or requests from government authorities.

To Communicate With You

We use your personal data to communicate about promotions, upcoming events, and other news about products and services offered by us and our selected partners.

To Optimize Our Platforms and Services

In order to optimize your user experience, we may use your personal data to operate, maintain, and improve our platforms and services. We may also use your personal data to respond to your comments and questions regarding the services and to provide you and other users with general customer service.

With Your Consent

We may use or share your personal data with your consent, such as when you instruct us to take a specific action with respect to your personal data, or you opt in for marketing communications. However, please note that, generally, we do not rely on consent as a legal basis for processing your personal data and we may process your

personal data without your knowledge or consent, in compliance with this Privacy Policy, where this is required or permitted by law.

Legal basis of processing

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

In processing your personal data in connection with the purposes set out in this Privacy Policy, we may rely on one or more of the following legal bases, depending on the circumstances:

- we have obtained your explicit prior consent to the processing (this legal basis is only used exceptionally in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way);
- the processing is necessary in connection with any contractual relationship that you may enter into with us;
- the processing is required by applicable law;
- the processing is necessary to protect the vital interests of any individual; or
- we have a legitimate interest in carrying out the processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

When we are involving third-party processors in the performance of our services and contractual obligations and such involvement requires the sharing of personal data, we have entered with our third-party processors into data processing agreements according to Art. 28 of the European General Data Protection Regulation (“GDPR”) and, as far as required, further appropriate safeguards according to Art. 46 – 49 GDPR. The list of third-party Processors to which we disclose your personal data can be requested by e-mail to support@moonsama.com

Personal Data Disclosure

Without your explicit approval, we do not trade, lease, or sell the personal data you provide us with to other organizations, with exceptions outlined in this Privacy Policy. We may disclose personal data to third parties (which include entities that are not

considered processors under Art. 28 of the GDPR) without your consent under the following circumstances:

- **Business Transactions:** In scenarios where we negotiate or conclude a business deal involving the sale or transfer of all or a part of our business or assets, we may share personal data. Such transactions could involve mergers, acquisitions, financing, or bankruptcy proceedings.
- **Compliance with Laws and Law Enforcement; Safety and Protection Measures:** Personal data may be shared for legal, protection, and safety reasons, or in order to comply with applicable laws.
- **Professional Advisors and Service Providers:** Personal data may be shared with individuals or entities that require it to perform tasks on our behalf. This includes third-party companies and individuals that administer and deliver the Service for us (such as customer support, hosting, email delivery, and database management services), as well as professional advisors like lawyers, bankers, auditors, and insurers.
- **Products:** Personal data may be shared with other products within the Moonsama.
- **Marketing Activities:** If you've opted in to receive informational content or newsletters from us, your personal data might be shared with our business partners. This allows us or our business partners to notify you of upcoming opportunities and promote our respective products and services.
- **Other Instances:** With your permission, we may share your personal data with other companies or entities of your choosing. Such uses will be subject to the privacy policies of the recipient entity or entities.

We also reserve the right to share aggregated and/or anonymized data for use by others.

International Transfer of Personal Data

If you prefer that your personal data not be transferred to third countries outside the EU/EEA or, if not based in the EU/EEA, outside your current country of residence, please refrain from checking the consent box and from providing us with any personal data.

Please be aware that we gather your personal data directly from the country where you reside and may store it on servers outside the EU/EEA (or the country you reside in), possibly managed by third-party service providers. The engagement of third-party service providers stems from their legitimate interest in maintaining a secure and adequate data storage system. We select these third-party service providers with utmost diligence, ensuring they abide by relevant privacy laws, understand the critical importance of personal data protection, and employ advanced technical and organizational measures. Hence, our legitimate interest supersedes any potential interest you might have in refraining from transferring your personal data.

BY GIVING YOUR CONSENT TO THIS PRIVACY POLICY, YOU ARE ALSO AGREEING TO SUCH INTERNATIONAL TRANSFER AND PROCESSING OF YOUR PERSONAL DATA BY THESE THIRD PARTIES IN THIRD COUNTRIES OUTSIDE THE EU/EEA. FOR ANY INFORMATION REGARDING THIRD-PARTY SERVICE PROVIDERS AND THE RESPECTIVE THIRD COUNTRIES INVOLVED IN THE PROCESSING OF YOUR PERSONAL DATA, PLEASE CONTACT US AT support@moonsama.com

External Links

The digital content presented on our website may direct you toward third-party websites. Please note that our jurisdiction and liability do not extend to the information, content, or privacy protocols implemented by these third-party sites. We advise all our users to exercise discernment upon departing from our website and to carefully review the privacy policies of any external sites that may gather personally identifiable information.

Security

Our system incorporates stringent technical and organizational security measures intended to safeguard any personal information we process. However, in the digital age, no internet transmission or information storage method can offer absolute security. Thus, we cannot unequivocally assure you that unauthorized entities such as hackers or cybercriminals will not manage to breach our security measures and unlawfully access, acquire, or alter your information. While we strive to protect your personal information to the best of our abilities, any transmission of personal data to and from our website is carried out at your discretion and risk. We strongly recommend accessing our website within a secure environment for your own protection.

Preservation of Personal Information

We maintain the personal data we gather for a duration deemed necessary and relevant to accomplish the objectives delineated in this Privacy Policy. Once this period has passed, we assure that the data will either be deleted or anonymized. After anonymization, we reserve the right to utilize this information indefinitely without any further communication to you. In certain circumstances, we may retain personal data beyond the initially intended period to comply with legal obligations, counteract fraud, resolve disagreements (or in instances where potential litigation or disputes relating to our relationship with you are foreseen), rectify issues, support investigations, enforce our Terms of Use, and other actions as permitted by law.

In order to ascertain the suitable retention period for personal data, we evaluate various factors including the volume, nature, and sensitivity of the personal data, the potential risk of damage arising from unauthorized utilization or disclosure of your personal data, the reasons for processing your personal data and whether those reasons can be fulfilled through alternate means, alongside the compliance with legal requisites.

Your Access to and Control Over Your Personal Data

You retain the right to discontinue any future interactions with us at your convenience. You can exercise this right at any time by reaching out to us through the contact form provided on our website. Additionally, you may:

- Request access to your personal data - This allows you to obtain a copy of the personal data we possess about you, confirming that it's being processed lawfully.

- Request correction of your personal data - This allows you to correct any incomplete or inaccurate data we hold about you, subject to our verification of the validity of the new data provided.
- Request deletion of your personal data - This allows you to request the removal of your personal data when there's no justified cause for us to continue processing it. You can also request deletion if you have successfully objected to the processing, if your data has been processed unlawfully, or if legal obligations require us to erase your data. However, we may not always be able to comply due to specific legal reasons which will be communicated to you, if applicable, at the time of your request.
- Object to the processing of your personal data - You can object if we are processing your data based on a legitimate interest (or those of a third party) that you believe infringes upon your fundamental rights and freedoms. You also have the right to object if your personal data is being used for direct marketing purposes. However, in some cases, we may have justifiable grounds to process your personal data that supersede your rights and freedoms.
- Request restriction on the processing of your personal data - You can ask us to pause the processing of your personal data in the following situations:
 - For us to verify the accuracy of the data
 - If our data usage is unlawful but you don't want us to delete it
 - If you need us to retain the data for establishing, exercising, or defending legal claims, even if we no longer need it
 - If you have objected to our data usage but we need to verify if we have overriding legal grounds to use it.
- Request the transfer of your personal data - We can provide your personal data to you or a third party of your choice in a structured, commonly used, machine-readable format. This right only applies to automated information that you gave us consent for, or information used to fulfill a contract with you.
- Right to withdraw consent - If we've sought your consent to process your personal data, you have the right to withdraw it at any time. This withdrawal won't impact any processing carried out prior to your withdrawal. However, if you do

withdraw your consent, we may not be able to deliver certain services to you. We will inform you if this is the case when you withdraw your consent.

To exercise any of the rights listed above, please contact us at support@moonsama.com

There will generally be no fee for accessing your personal data or exercising your rights. However, we may charge a reasonable fee or refuse to comply if your request is clearly baseless, repetitive, or excessive.

To confirm your identity and validate your right to access your personal data (or exercise any of your other rights), we may ask for specific information from you. This is a security measure to prevent unauthorized disclosure of personal data. We may also ask for additional details to expedite our response.

We aim to respond to all legitimate requests within one month. However, if your request is particularly complex or numerous, it may take us longer than a month. In such a case, we will notify you and keep you updated.

Tracking Technologies Generally

Most commercial browsers provide tools that allow you to disable or delete standard cookies, and even prevent them from being stored in the future through specific settings.

Google Analytics

You have the option to control the use of cookies from Google Analytics. To do this, visit <https://tools.google.com/dlpage/gaoptout> and download the Google Analytics Opt-out Browser Add-on.

Contact

If you have a direct business relationship with us, we are Data Controllers according to Art. 4 para. 7 GDPR.

For any requests, you can contact us as follows:

105 CECIL STREET #12-02 THE OCTAGON SINGAPORE (069534)

You can contact our data privacy officer as follows: support@moonsama.com

We may process your data on behalf of a contract partner of yours (e.g. vendor, seller, service provider). In this case, the privacy policy of your partner applies. Please contact your contract partner for more information.

Privacy Policy Changes

Our commitment to enhancing communication methods and adding innovative features to our platforms and services necessitates regular reviews and potential modifications to our Privacy Policy. We highly recommend that you revisit this Privacy Policy periodically and especially prior to providing personal data through our platform.