Privacy Policy

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INTRODUCTION

Glitch ("**Glitch**," "**we**," "**us**," or "**our**") respects your privacy and is committed to protecting it through our compliance with this "**Privacy Policy**". Any capitalized terms not defined herein are defined in our Terms of Use found here: Terms of Use.

This Privacy Policy describes the types of information we may collect from you or that you may provide when you access our Site or use our App.

This Privacy Policy applies to information we collect:

- on the Platform; and
- in email, text, and other electronic messages between you and us.

It does not apply to information collected by:

- us offline or through any other means, including on any other service operated by Glitch or any third-party (including our affiliates and subsidiaries); or
- any third-party (including our affiliates and subsidiaries), including through any application or content that may link to or be accessible from or through the Platform.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to access or use the Platform. By accessing or using the Platform, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see Changes to our Privacy Policy Section). Your continued use of the Platform after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

CHILDREN UNDER THE AGE OF 18

The Platform is not intended for children under eighteen (18) years of age. No one under age eighteen (18) may provide any information to or on the Platform. We do not knowingly collect Personal Information (defined below) from children under eighteen (18). If you are under eighteen (18), do not use or provide any information on the Platform or through any of its features, register on the App, make any purchases through the App, use any of the interactive or public comment features of the Platform or our Discord Server, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received Personal Information from a child under eighteen (18) without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under eighteen (18), please contact us at legal@glitch.financial.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect several types of information from and about Registered Users and Visitors, including information:

- that is about you but individually does not identify you, such as race and gender;
- about your internet connection, the equipment you use to access the Platform, and usage details;
- When you register as a Registered User, we collect your name, email address, date of birth, country of residence, and other information necessary to verify your identity and comply with applicable laws;

- any and all data you upload to the Platform, whether such data belongs to you or another;
- about your trading preferences, risk tolerance, and trading history (we do not store your complete credit card information; this is processed securely through our payment processor);
- any content you upload or connect to our App or Discord Server;
- from third parties: (i) identity verification services, (ii) third-party trading platforms you connect to our App, and (iii) public databases and regulatory authorities; and
- by which you or another may be personally identified, such as name, postal address, email address, telephone number, Discord ID, or any other identifier by which you may be contacted online or offline ("**Personal Information**").

How we collect this information:

- directly from you when you provide it to us; and
- automatically as you navigate through or use the Platform. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

OAuth Authentication

Use of OAuth Providers

We offer authentication via Google OAuth. When you log in or sign up using these providers, we collect certain information as authorized by your provider's privacy settings.

Information Collected

When you use OAuth to log in, we may collect:

- Basic profile information such as your name and profile picture,
- Your email address, and
- Any other information you agree to share during the OAuth authorization process.

Purpose of Data Collection

The information collected via OAuth is used to:

- Authenticate your identity,
- Create and manage your account, and
- Personalize your experience on the App.

Data Sharing

We do not share the information collected via OAuth with any third parties except as necessary to provide our services, comply with legal obligations, or protect our rights.

Data Security

We use industry-standard security measures to protect the information collected via OAuth through our third-party database provider, Supabase. This includes encryption of data in transit using the HTTPS protocol and regular security reviews.

User Control

You can manage the data and permissions granted to us via the OAuth provider's settings. If you wish to revoke access, you can do so directly through your OAuth provider's account settings.

Retention of Data

We retain the information collected via OAuth for as long as your account is active or as needed to provide the App to you and fulfill the purposes described in this Privacy Policy. This may include keeping your Personal Information after you have deactivated your account for the period of time needed for us to pursue legitimate business interests, conduct audits, comply with legal obligations, resolve disputes and enforce our agreements. If you wish to delete your retained data, please contact us at legal@glitch.financial, and we will delete your data in accordance with the foregoing and our legal obligations.

Information You Provide to Us

The information we collect on or through the Platform may include:

- Information that you provide by filling in forms on the App or connecting your brokerage account to it. This includes information provided at the time of registering to use the App, subscribing to our service, posting material, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with the App.
- Records and copies of your correspondence (including email addresses) if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through the App and of the fulfillment of your instructions.
- Your search queries on the App.
- Your registrations and your consents to contact us on or related to the App.

Information We Collect Through Automatic Data Collection Technologies

- As you navigate through and interact with the Platform, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:
    - details of your visits to the Platform, including traffic data, location data (more below), logs, and other communication data and the resources that you access and use on the App;
    - information about your computer or device and internet connection, including your IP address, operating system, and browser type;
    - information about your location to ensure compliance with our location restrictions;
    - data related to crypto payment transactions, excluding any private addresses or mnemonics or pass phrases; and
    - data on transactions processed through Stripe, excluding any card information or information that is sensitive in nature.

- The information we collect automatically may include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways. It helps us to improve the Platform and to deliver a better service, by enabling us to:
    - estimate our user size and usage patterns;
    - store information about your preferences;
    - speed up your searches; and
    - recognize you when you return to the App.
- The technologies we use for this automatic data collection may include:
    - *Cookies (or browser cookies).* A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of the Platform. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Platform. Cookies are used after authentication in order to authorize a Registered User to continue to access the parts of the Site that are specific to them.
    - *Local Storage Objects*. Local Storage objects are sets of data that can be stored on your browser and/or hard drive by us. We use local storage objects to recognize you when you return to our Platform.
    - *Session Storage Objects*. Session Storage is similar to local storage except that the information clears when your session ends. We use session storage objects to remember your preferences while engaged with our Platform.

We may tie information to Personal Information about you or that you uploaded that we collect from other sources, or you provide to us.

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any Personal Information:

- to present and improve the Platform and its contents to and for you;
- to provide you with information, products, or services that you request from us;
- to fulfill any other purpose for which you provide it;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us;
- to notify you about changes to the Platform or any products or services we offer or provide though it;
- to allow you to participate in interactive features on the App, if any;
- in any other way we may describe when you provide the information;
- to comply with our legal and compliance obligations;
- to prevent fraud and abuse
- to enforce our Terms of Use; and

- for any other purpose with your consent.

INTERNATIONAL DATA TRANSFERS

We may transfer your information to countries other than your country of residence, including the Cayman Islands. When we do so, we ensure appropriate safeguards are in place to protect your information and comply with applicable data protection laws. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

EUROPEAN ECONOMIC AREA (EEA) AND UK RESIDENTS

If you are located in the EEA or UK, the following additional provisions apply:

- Legal Basis for Processing: We process your information based on the following legal grounds:
    - Contract performance
    - Legal obligations
    - Legitimate interests
    - Your consent
- International Transfers: Transfers outside the EEA/UK are protected by appropriate safeguards
- Additional Rights: You have the right to lodge a complaint with your local data protection authority

DISCLOSURE OF YOUR INFORMATION

We may disclose or generate usage data from aggregated information about Visitors and Registered Users, including Resultant Data, and any other information that does not identify any individual, without restriction.

We may also disclose Personal Information that we collect, or you provide, as described in this Privacy Policy:

- to our subsidiaries and affiliates;
- to contractors, service providers, and other third-parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them;
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Glitch about the Platform's Registered Users and Visitors is among the assets transferred;
- to fulfill the purpose for which you provide it;
- for any other purpose disclosed by us when you provide the information; and
- with your consent.

We may also disclose your Personal Information:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce or apply our rights under this Agreement and/or other agreements, including for billing and collection purposes; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Glitch, our users, or others.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Promotional Offers from Us. If you do not wish to have your email address or contact information used by us to promote our own or third-parties' products or services, you can opt-out by sending us an email stating your request to legal@glitch.financial. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt-out only applies to the App unless you specify otherwise and it is within our control.

We do not sell your information to third-parties, but if you provide it to our third party partners or other users in order to enhance your experience with the Platform or engage in other activity on our Platform wherein we require the services of the third party, such third parties may use such information according to their own terms of use or other policies.

PRIVACY RIGHTS

Depending on your location and subject to applicable law, you may have the following rights with regard to the Personal Information we control about you:

- The right to request confirmation of whether we process Personal Information relating to you, and if so, to request a copy of that Personal Information;
- The right to request that we rectify or update your Personal Information that is inaccurate, incomplete or outdated;
- The right to request that we erase your Personal Information in certain circumstances provided by law;
- The right to request that we restrict the use of your Personal Information in certain circumstances, such as while we consider another request that you have submitted;
- The right to request that we export your Personal Information that we hold to another company, where technically feasible;
- Where the processing of your Personal Information is based on your previously given consent, you have the right to withdraw your consent at any time; and
- Where we process your information based on our legitimate interests, you may also have the right to object to the processing of your Personal Information. To exercise your rights, please contact us using the contact information provided at the bottom of this Privacy Policy.

ACCESSING AND CORRECTING YOUR INFORMATION

You can review and change your Personal Information by logging into the App and visiting your profile page or using the OAuth features described above.

You may also send us an email at legal@glitch.financial to request access to, correct, or delete any Personal Information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement, because it is not technically possible, or cause the information to be incorrect.

DATA SECURITY

We have implemented measures designed to secure your Personal Information or Personal Information uploaded by you from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Glitch will never custody your private keys or crypto unless we enter into a separate agreement with you.

The safety and security of any information you share also depends on you. Where we have given Unique Identifiers for access to certain parts of our App, you are responsible for keeping these Unique Identifiers confidential. We ask you not to share your Password with anyone, as your access and use of the App is personal to you.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Platform. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Platform.

Changes to our Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our Visitors' and Registered Users' Personal Information, we will notify you by email to the primary email address specified in your account. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, for periodically visiting the Site, and checking this Privacy Policy for any changes.

Contact Information

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at: legal@glitch.financial