

Privacy Policy SnowPay LLC

Last updated 27 February 2025

In this Policy

"we", "us" and "our" refers to **SnowPay LLC**, details of which are contained in paragraph 1.1 below.

"personal information" means any information relating to you as an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity. For the avoidance of doubt, personal information does not include data that cannot reasonably be used to identify you or otherwise be linked to you (which is referred to simply as data, non-personal information/data, anonymous data, or de-identified data).

"processing" means any operation or set of operations which is performed on data or on sets of data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. ¹

www.sec.gov

If you have any questions about this policy or how we collect and use personal information about you, please contact us.

1. Information about Controller

1.1 If you are based in the United States, **SnowPay LLC** is the controller of your personal information. Our registered offices are below:

- **United States – 121 Warwick Street, Iselin, New Jersey, 08830**

1.3 If you have any questions or would like to exercise any privacy rights described in this policy, contact us via mail at our registered office or via email at **support@snowpay.xyz**

2. Contract information and other correspondence

2.1 When you enter into a contract with us (or someone does so on your behalf) there will be personal information about you relating to that contract such as your name, contact details, contract details, delivery details, and correspondence with us about the contract. We may also generate further information from the information you provide, such as a case ID number that will be assigned to you.

2.2 We need certain information to carry out our contract with you and you must provide this in order to enter into a contract with us (or as required under that contract), if you do not, we may not be able to carry out our contract with you. Mandatory information fields are generally set out when you are entering into the contract, but in particular, you must provide the following information:

- Your name and contact details (including your email address).
- Your delivery address.
- Your payment details.
- Information to verify your identity and other information for us to carry out anti-money laundering checks.

2.3 Other correspondence or interaction (for example by email, telephone, regular mail, SMS or via our website) between you and us, will include personal information (such as names and contact details) in that correspondence. This may include enquiries, reviews, follow-up comments or complaints lodged by or against you and disputes with you or your organisation.

2.4 Call information. We may also collect details of phone numbers used to call our organisation and the date, time and duration of any calls. Please note that if we record your calls to or from us, we will inform you of this and, where required by applicable law, obtain your consent.

2.5 We will keep and use that information to carry out our contract with you (if applicable), to comply with any legal requirements for us to maintain certain records or carry out certain verifications, and/or for our legitimate interests in dealing with a complaint or enquiry and administering your (or your organisation's) account or order and any services we offer, as well as to review and improve our offerings, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

3. Marketing

3.1 We may collect your name and contact details (such as your email address, phone number or address) in order to send you information about our products and services which you might be interested in. We may collect this directly from you, or through a third party.

3.2 You always have the right to "opt out" of receiving our marketing. You can exercise the right at any time by contacting us, using the details shown above. If we send you any marketing emails, we will always provide an unsubscribe option to allow you to opt out of any further marketing emails. If you "opt-out" of our marketing materials, you will be added to our suppression list to ensure we do not accidentally send you further marketing. We may still need to contact you for administrative or operational purposes, but we will make sure that those communications don't include direct marketing.

3.3 If you are an existing customer or are acting in a professional capacity as part of a company or LLP, where permitted by local law we use your contact details as necessary for our legitimate interests in marketing to you and maintaining a list of potential customers.

3.4 If you are not an existing customer and are not acting in a professional capacity as part of a company or LLP, or where otherwise required by local law, we will only contact you for marketing purposes with your consent (whether we have collected your details directly from you, or through a third party).

3.5 We never share your name or contact details with third parties for them to send you marketing unless we have your "opt-in" consent to share your details with a specific third party for them to send you marketing. We do use third party service providers to send out our marketing, but we only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

3.6 When we send marketing emails to you, we use "web beacons" to collect information about when you open the email, your IP address and browser or email client type, and other similar information. We do this as necessary for our legitimate interests in reviewing and considering our direct marketing activities or, where required by local law, with your consent. We keep this information for marketing of our services.

4. Website information

4.1 We and third parties on our behalf may collect information about you and your use of our website via technical means such as cookies, webpage counters and other analytics tools. The information we collect may include your IP address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. We use this as necessary for our legitimate interests in administering and improving our website and its content, to ensure it operates effectively and securely, and to develop our business and inform our marketing strategy or, where required by local law, with your consent. We may also create aggregate statistical data from that information (for instance, overall numbers of website visitors) in our legitimate interests to administer and improve our website, and subsequently use this aggregate statistical data (which is not personal information about you). Your browser settings may allow you to transmit a "do not track" signal. Like many websites, ours is not designed to respond to such signals.

4.2 We, or third party advertisers, may also use this information to personalize or serve adverts to you. Where those adverts are targeted, this advertising may involve using website information and information we (or our third party advertisers) have obtained from third parties. Where our adverts are displayed to you using your information, your information is used as necessary for our legitimate interests in marketing to you or, where required by local law, with your consent. However, your name and contact details won't be used to personalize online adverts.

4.3 Our website may, from time to time, contain links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or any practices employed by such third parties. When you leave our website, we encourage you to read the privacy notice of every website you visit.

5. Business contact information

5.1 If you work for one of our customers, suppliers or business partners, the information we collect about you may include your contact information, details of your employment and our relationship with you. This information may be collected directly from you or provided by your organisation. Your organisation should have informed you that your information would be provided to us and directed you to this policy. We use this as necessary for our legitimate interests in managing our relationship with your organisation. If we have a business relationship with you or your organisation, we may receive information about you from your organisation. We reserve the right to issue separate privacy notices setting out the handling of personal information in an employment context, including where services are offered under a contract for services and/or on a consultancy basis.

6. Information collected at our premises

6.1 Visitor information. We collect information about visitors to our premises. We may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number in our legitimate interests to ensure a safe environment for you. If you have an accident at our premises, this may include an account of your accident. If you require any special assistance, or have specific dietary requirements, this information will be recorded where necessary to protect your vital interests and will be deleted when no longer required in accordance with our information retention policies.

6.2 CCTV. We may operate CCTV at our premises which may record you and your activities. We display notices to make it clear what areas are subject to surveillance. We only release footage following a warrant or formal request from law enforcement, or as necessary in relation to disputes.

6.3 We use this information as necessary for our legitimate interests in administering your visit, ensuring site security and visitor safety, and administering parking.

6.4 Visitor information is kept for a period necessary to deal with security issues, up to 3 years. If you have an accident on our premises, our accident records are retained for a period necessary to deal with any claims, up to 6 years.

7. Job applications

7.1 We will collect and hold information on job applicants, including information you provide to us in your application, or provided to us by recruitment agencies, as well as information on you from any referees you provide. We may also collect information about your professional history which you make available on LinkedIn or other social media or networking services, or which are on your employer's website.

7.2 We use this as necessary to enter into an employment contract with you, and for our legitimate interests in evaluating candidates and recording our recruitment activities, and as necessary to exercise and perform our employment law obligations and rights. Where you

voluntarily provide us with special categories of data, such as information about your race, health or sexuality, we will store this as part of your application on the basis that you have decided and explicitly consented to disclose for this purpose, and to ensure that our record of your application is accurate so we can comply with (and demonstrate our compliance with) our obligations under employment law.

7.3 You must provide certain information (such as your name, contact details, professional and educational history) for us to consider your application fully. If you have not provided all of this information, we may contact you to ask for it. Providing this information is voluntary, but if you fail to do this, we may not be able to properly consider your application. If your application is successful, we will retain information you provide, including special categories of data, for such time as an employment relationship exists between us, and thereafter in accordance with paragraph 15 below. If your application is unsuccessful, we will retain your personal information for such period as you specifically consent to, and in the absence of such consent your information will be deleted.

7.4 If you are listed as a reference by an applicant, we will hold your name, contact details, professional information about you (such as your employer and job title) and details of your relationship with the applicant. We will use this information as necessary for our legitimate interests in evaluating candidates and as necessary to exercise and perform our employment law obligations and rights. Your information will be kept alongside the applicant's information. Where the applicant is successful, we will retain this information until we no longer need to contact that worker after they have stopped working for us. Where the applicant is unsuccessful, we will retain this information for such period as the applicant consents to under paragraph 7.3 above.

7.5 If you are listed as an emergency contact by someone who works for us, we will hold your name, contact details and details of your relationship with that worker. We will use this to contact you as necessary to carry out our obligations under employment law, to protect the vital interests of that worker, and for our legitimate interests in administering our relationship with that worker. Your information will be kept until it is updated by that worker, or we no longer need to contact that worker after they have stopped working for us. For the avoidance of doubt, we do not require emergency contact information from prospective job applicants, and if such information is volunteered by an applicant, we do not store such information unless their application is successful.

8. Legal claims

8.1 Where we consider there to be a risk that we may need to defend or bring legal claims, we may retain your personal information as necessary for our legitimate interests in ensuring that we can properly bring or defend legal claims. We may also need to share this information with our insurers or legal advisers. How long we keep this information for will depend on the nature of the claim and how long we consider there to be a risk that we will need to defend or bring a claim.

9. Data collected during anti-money laundering analysis

9.1 In order to conduct our anti-money laundering (AML) analysis, we may collect and use following personal information: name, email, country, nationality, phone number, job description, social media links, location, and wallet address(es).

9.2 We will use all that information to provide our AML analysis. Processing in such a purpose is based on our legitimate interest – processing of personal information is strictly necessary for the purposes of preventing fraud.

9.3 We collect that information from publicly available sources in Clearnet and Deep Web.

10. Information we receive from third parties

10.1 In addition to the sources set out above, we may also receive information about you from the following sources:

- Our service providers. We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies) who may provide us with information about you, to be used as set out above.
- Our other channels. This is information we receive about you if you use any of the other websites we operate or the other services or products we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this website. We will also have told you for what purpose we will share and combine your data.
- Publicly available sources. We obtain information from publicly available sources such as: LinkedIn or Facebook, Twitter, and other social media and online platforms.
- Credit information. We may also collect credit information on you from third party reference agencies.

11. Why else do we use your information?

11.1 Common uses of your information. We will only use your personal information when the law allows us to do so. Although in limited circumstances we may use your information because you have specifically consented to it, we generally use your information in the ways set out in this notice because:

- We need to perform a contract we have entered into with you.
- We need to comply with a legal obligation.
- It is necessary for our legitimate interests (or those of a third party) and your interests and rights do not override those interests.
- We need to protect your interests (or someone else's interests) or where it is needed in the public interest (although these circumstances are likely to be rare).

12. Why we might share your personal information with third parties

As well as any sharing listed above, we may also share your information with third parties, including third-party service providers and other entities in our group. We never sell your personal information to third parties for money.

12.1 Why we might share your personal information with third parties? – We may share your personal information with third parties to conduct our business and in accordance with the purposes set out in this policy, if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, in order to enforce or apply our agreements with you, or to protect the rights, property, or safety of us, our customers, or others or where we have another legitimate interest in doing so. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

12.2 Which third-party service providers process your personal information? We also may need to share your personal information with third-party service providers (including contractors and designated agents) so that they can carry out their services, including for the following purposes: legal advice, contract administration, marketing, analytics, online tracking, order fulfilment, delivery, administration, IT services, payment processing.

12.3 When might we share your personal information with other entities in the group? We may share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, and for system maintenance support and hosting of data.

12.4 How secure is your information with third-party service providers and other entities in our group? All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information. Where third parties process your personal information on our behalf as "data processors" they must do so only on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

12.5 What about other third parties? We may share your personal information with other third parties, for example in the context of the possible or actual sale or restructuring of the business, where necessary in connection with the purposes which your information was collected for or, with your "opt-in" consent, to third parties for them to send you marketing. We may also make information available to third party advertisers and providers of cookies and other analytics tools. Finally, we may need to share your personal information with a regulator or to otherwise comply with the law or legal requests.

14. Data security

14.1 As well as the measures set out above in relation to sharing your information, we have put in place appropriate internal security measures intended to prevent your personal information from being accidentally lost, or used, accessed, altered or disclosed in an unauthorized way. In

addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

15. How long will we keep your information for?

15.1 We have set out above indications of how long we generally keep your information. In some circumstances, it may be necessary to keep your information for longer than that in order to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

15.2 To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the applicable legal requirements, and the purposes for which we process your personal information and whether we can achieve those purposes through other means, including whether we need the information to continue to provide you with products and services, resolve a dispute, enforce our contractual agreements, promote security and integrity or prevent harm.

15.3 In some circumstances we may anonymize or deidentify your personal information so that it cannot reasonably be used to infer information about you or otherwise be linked or associated with you, in which case we may use such information without further notice to you. To the extent we process any anonymized or deidentified information, we will maintain and use such information in anonymized/deidentified form and not attempt to reidentify the information.

16. Your rights

16.1 Depending on where you live, you may have certain rights in relation to your personal information under applicable data protection law. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. Under certain circumstances, by law you have the right to:

16.1.1 Request access to your personal information. This enables you to request a copy of the personal information we hold about you, including details relating to the ways in which we use and share your personal information, or the ways in which your personal information has or may have been used or disclosed by us in the past.

16.1.2 Request correction (rectification) of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

16.1.3 Request deletion (erasure) of your personal information. This enables you to ask us to delete or remove personal information that we maintain about you.

16.1.4 Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to us using your information on this basis and we do not have a

compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also have the right to object where we are processing your personal information for direct marketing purposes, or where the processing is based on your consent and you withdraw that consent.

16.1.5 Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

16.1.6 Request the transfer of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means. This is also referred to as a 'right to data portability'.

16.1.7 Withdraw consent. In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

16.1.8 Lodge a complaint. If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with the relevant data protection supervisory authority.

16.1.9 Freedom from direct marketing ('opting out'). Further information on this right is found at paragraph 3.2 above.

16.2 If you want to exercise any of the rights described in paragraph 16.1, please contact us on the details at paragraph 1.2 above. Exercise of any of the above rights may impact the services we can provide and we will explain the consequences to you if you decide to exercise one or more of these rights. In addition, you are directed to paragraph 18 below, which provides further information on the blockchain and how these privacy rights may be affected by the nature of the blockchain.

16.3 No fee usually required. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if one or more of your requests for access are clearly unfounded or excessive, in particular because of any repetitive character in such requests. Alternatively, we may refuse to comply with such requests in such circumstances. However, we will not discriminate against you for exercising any of the rights set out above.

16.4 What we may need from you. We may need to request specific information from you to help us understand the nature of your request, to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This may include your [email address, government issued ID or date of birth]. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. Depending on where you reside, you may designate, in writing or through a power of attorney document, an authorized agent to make requests on your behalf to exercise your rights. Before

accepting such a request from an agent, we will require that the agent provide proof you have authorized them to act on your behalf, and we may need you to verify your identity directly with us.

16.5 Timescale. Please consider your request responsibly before submitting it. We will respond to your request as soon as we can.

17. Changes to this privacy policy

17.1 Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate (such as where we make material changes to the way in which we use or disclose personal information), notified to you by e-mail or otherwise. Please check back frequently to see any updates or changes to our privacy notice. If you do not agree to any changes to this privacy policy, please do not continue using or accessing our website, products or services.

18. Your information and the blockchain

18.1 Part of our services includes the provision of products and tools which require us to disclose your information on the blockchain. In this context, 'the blockchain' may refer to one or more global decentralized public networks that harness distributed ledger technology. Given the nature of decentralized networks, information written onto the blockchain may be transferred and stored (i.e. distributed) across the globe in a variety of forms (i.e. 'ledgers').

18.2 It is important for you to understand that certain information on several blockchains cannot be modified or deleted (often referred to as 'immutable'), which may restrict the exercise of your rights to restrict, object to or request erasure or rectification of your personal information.

18.3 If you want to ensure your privacy rights are not affected in any way, you should not transact on blockchains as certain rights will not be fully available or exercisable by you or us.

18.4 Information written onto the blockchain is limited by the nature of the decentralized public network. For example, in the Ethereum blockchain, information written onto that blockchain may include cryptographic wallet addresses, and the amount of cryptocurrency transferred (sent or received).

18.5 You are responsible for maintaining the details of your wallet (including private and public keys) secure. In most cases ultimate decisions to (i) transact on the blockchain using your Ethereum/Bitcoin or other cryptocurrency wallet address, as well as (ii) share the public key relating to your Ethereum/Bitcoin or other cryptocurrency wallet address with anyone (including us) rests with you.

18.6 In particular, the blockchain is available to the public and certain personal information shared on the blockchain will become publicly available (including, but not necessarily limited to, wallet addresses and/or public keys).

18.7 We will ensure that information that can be used to identify you from a wallet address you provide to us is kept secure, and will only disclose such information where you consent to such disclosure, where necessary for the provision of our services under the terms of any contract with you, or where required to do so under a legal obligation, including where we receive a request from a court or law enforcement authority or agency of competent jurisdiction.

19. Jurisdiction and interpretation

19.1 This privacy policy is to be construed in accordance with US law, and the federal courts of the US shall have jurisdiction to determine any disputes arising in relation to the interpretation or construction of the same.

20. California Residents

20.1 This section provides additional information to residents of California. For purposes of this section, "personal information" also includes "sensitive personal information" as those terms are defined under the California Consumer Privacy Act ("CCPA").

20.2 In the preceding 12 months, we collected and disclosed for a business purpose the certain categories of personal information and sensitive information. Please note that some types of information included in one category may overlap with other categories.

20.3 The specific business or commercial purposes for which we collect and disclose your personal information and the categories of sources from which we collect your information are described above in paragraphs 2 to 12. Information about our retention of personal information is described in paragraph 15. We only use and disclose sensitive personal information for the purposes specified in the CCPA or otherwise with your consent.

20.4 We do not "sell" or "share" (as those terms are defined in the CCPA) personal information, nor have we done so in the preceding 12 months. Further, we do not have actual knowledge that we sell or share personal information about California residents under 16 years of age.

21. US Consumer Privacy Notice

The following Consumer Privacy Notice applies if you are an individual who resides in the United States and use our financial products and services for your own personal, family or household purposes. For a printer-friendly version, [click here](#).

FACTS WHAT DOES SNOWPAY DO WITH YOUR PERSONAL INFORMATION?

Why? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What? The types of personal information we collect and share depend on the product or service you have with us. This information can include: • Social Security number and Contact and employment information • Account balances and payment history • Account transactions and transaction history. When you are no longer our customer, we continue to share your information as described in this notice.

How? All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons SnowPay chooses to share; and whether you can limit this sharing.

Questions? | Go to snowpay.xyz