

FTX US Privacy Policy

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We at West Realm Shires Inc. dba FTX US and our affiliates, including FTX Capital Markets LLC (our registered broker dealer) (collectively, “**FTX US**”, “**we**” or “**us**”) have created this privacy policy (this “**Privacy Policy**”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy is designed to help you understand how we collect, use, process, and share information we collect via our website located at <https://ftx.us/> and other domain names offering or linking to the website (the “Site”), our cryptocurrency trading exchange and non-fungible token (“**NFT**”) platform accessible via the Site (the “**FTX NFT Platform**”), our services, including but not limited to, broker dealer services, and any corresponding mobile application (“App”) offered by FTX US and to help you understand and exercise your privacy rights within the scope of applicable laws. The Site, FTX NFT Platform, our services and App are collectively called the “Services.”

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1. SCOPE

This Privacy Policy applies to information processed by us, including in connection with our Services. For more information on how we process your nonpublic personal information as a financial institution, please refer to our Financial Information Privacy Notice available at <https://help.ftx.us/hc/en-us/articles/360043578593-Privacy-Policy>.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. Information You Provide to Us Directly

We may collect the following personal information that you provide to us.

- **Account Creation.** To create an account with us and use our Services, we may collect the following information from you:
 - Identification information: First and last name, date of birth, gender, phone number, email, government identification number (including Social Security Number, driver's license number and passport number) and other information necessary to verify your identity to comply with our regulatory obligations under financial or anti-money laundering laws;
 - Institutional information: If you are an institutional customer, we may collect your institution's legal name, Employer Identification number (or comparable number issued by a government), proof of legal formation (e.g. Articles of Incorporation), and personal identification information for all material beneficial owners;
 - Financial information: Bank account information, routing number, transaction history, trading data and/or tax identification;
 - Nonpublic Personal Information: When you register to become a customer, we will also collect your nonpublic personal information which means (i) any information you provide to us to obtain a financial product or service from us, (ii) any information about you resulting from any transaction involving a financial product or service between a us and you, or (iii) any information we otherwise obtain about you in connection with providing a financial product or service to you (collectively, the "NPI"). NPI is a subset of personal information and shall be considered personal information under this Privacy Policy.
 - Transaction information: Information about the transactions you make using our Services, such as the name of the recipient and the trading amount;
 - Employment information: Your job title, office location or source of income; and
 - Correspondence: Information you provide to our support teams.
- **Wallet.** To access some of the Services, you may need to provide us with information related to your digital asset wallet (each, a "**Wallet**"). Please note that we will not host, custody, or take possession of your private key or the contents of the Wallet.
- **Blockchain and Transfer-Related Information.** In order to engage in NFT transfers on the Services, you will need to provide us with access to or information about your Wallet and transfers on the FTX NFT Platform. As you use the Services, we may collect personal information and details associated with the transfers you are involved with, such as the NFTs you elect to mint, the NFTs you are transferring to or receiving from other users, the names and/or email addresses of

other FTX NFT Platform users from whom you receive or to whom you send NFTs, information about your preferences and your experience with sending NFTs and your Wallet's public address. We may collect your payment information if transfer fees or Gas fees are imposed by the associated blockchain.

- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, register for our newsletter or loyalty program, request customer or technical support, apply for a job, or otherwise communicate with us.
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. If you reply to one of these postings by submitting your application, CV and/or cover letter to us, we will collect and use your information to assess your qualifications.

B. Information Collected Automatically

We may collect personal information automatically when you use our Services:

- **Automatic Data Collection.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Cookies, Pixel Tags/Web Beacons, and Other Technologies.** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through your use of our Services.
 - **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity and improve security or that allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (see [Analytics](#) below). For example, we may track your activity on the Services, including recordings of your interactions with the Services;
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party websites.

See [“Your Privacy Choices and Rights”](#) below to understand your choices regarding these Technologies.

- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Services. Some of our analytics partners include:
 - **Google Analytics.** For more information, please visit [Google Analytics’ Privacy Policy](#). To learn more about how to opt-out of Google Analytics’ use of your information, please click [here](#).
 - **Plaid.** We may use Plaid Technologies, Inc. (“Plaid”), as a vendor to collect information about you, and you acknowledge and agree that the terms and conditions of Plaid’s privacy policy (found here: <https://plaid.com/legal/#privacy-policy>) will govern Plaid’s use of such information, and that you expressly agree to the terms and conditions of Plaid’s privacy policy. You hereby expressly grant Plaid the right, power, and authority to access and transmit your information as reasonably necessary for Plaid to provide its services to you in connection with your use of the Services.
 - **FullStory.** We use FullStory for recording your interactions with our Services which helps us deliver a better user experience. For more information on the privacy practices of FullStory, please visit <https://www.fullstory.com/legal/privacy/>.
 - **VWO.** We may use VWO, offered by Wingify Software Pvt. Ltd. (“Wingify”), to run A/B tests on our Services and deliver a better user experience. For more information on the privacy practices of Wingify, please visit <https://vwo.com/privacy-policy/>.
- **Social Media Platforms.** Our Services may contain social media buttons such as Discord, Twitter, Instagram, Facebook, and LinkedIn (that might include widgets such as the “share this” button or other interactive mini programs). These features may collect your IP address, which page you are visiting on our Services, and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

C. Information Collected from Other Sources

We may obtain information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made available via your privacy settings.

3. HOW WE USE YOUR INFORMATION

We use your information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfill our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Short-term, transient use, such as contextual customization of ads;
- Improving, upgrading or enhancing our Services;
- Developing new products and Services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions and other compliance activities;
- Enforcing our agreements and policies; and
- Complying with our legal obligations.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we market to you include email campaigns, custom audiences advertising.

If you have any questions about our marketing practices , you may contact us at any time as set forth in [“Contact Us”](#) below.

D. Other Purposes

We also use your information for other purposes as requested by you or as permitted by applicable law.

- **Consent.** We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.
- **Blockchain Data:** We may analyze public blockchain data to ensure parties utilizing our Services are not engaged in illegal or prohibited activity under our Terms of Service, and to analyze transaction trends for research and development purposes.
- **De-identified and Aggregated Information.** We may use personal information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, information about the device from which you access our Services, or other analyses we create.
- **Share Content with Friends or Colleagues.** Our Services may offer various tools and functionalities. For example, we may allow you to provide information about your friends through our referral services. Our referral services may allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share with us contact information of people with whom you have a relationship (e.g., relative, friend neighbor, or co-worker).

4. HOW WE DISCLOSE YOUR INFORMATION

We disclose your information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your information are described below.

- **Collaborations and Influencers.** We may share your information with other collaborators, influencers, and charities.
- **Service Providers.** We may share your personal information with our third-party service providers who use that information to help us provide our Services. This includes, but is not limited to, service providers that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners.** We may provide personal information to business partners with whom we jointly offer products or services. In such cases, our business partner’s name will appear along with ours.
- **NFT Partners.** NFT issuers offering their NFTs via our Services (“**NFT Partners**”) may offer NFT buyers physical promotional items or rewards (the “**Rewards**”) in connection with NFT purchases

made via the Services. If you choose to redeem your Rewards, we will provide the NFT Partner with your identifying information, such as your name and mailing address, to enable the NFT Partner to send you your Reward. If you direct us to do so, we may also share your personal information (name, email and zip code) with the NFT Partners for their marketing and promotional purposes.

- **Affiliates.** We may share your personal information with members of our corporate family, subsidiaries, or other companies under common control with us. (“**Affiliates**”).
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.”
- **APIs/SDKs.** We may use third-party Application Program Interfaces (“**APIs**”) and Software Development Kits (“**SDKs**”) as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in “[Contact Us](#)” below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email and Telephone Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms of Service or this Privacy Policy).

We process requests to be placed on do-not-mail, do-not-phone, and do-not-contact lists as required by applicable law.

- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Interest-Based Advertising.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#) and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Access Personal Information** about you, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information in a structured, commonly used, and machine readable format; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (the “right of data portability”);
- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion** of your personal information;
- **Request Restriction of or Object to** our processing of your personal information; and
- **Withdraw your Consent** to our processing of your personal information.

If you would like to exercise any of these rights, please contact us as set forth in “[Contact Us](#)” below. We will process such requests in accordance with applicable laws.

6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We have taken appropriate safeguards to require that your personal information will remain protected and require our third-party service providers and partners to have appropriate safeguards as well. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services.

If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail or by sending an email to you.

7. INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

If we transfer personal information to countries outside the European Economic Area, we will put in place appropriate safeguards to ensure that this transfer complies with the applicable laws and regulations. For more information about these safeguards, please contact us as set forth below.

If you are located outside the United States and choose to use the Services, you do so at your own risk.

8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

9. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

This Supplemental California Privacy Notice only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 ("CCPA"). The CCPA provides California residents with the right to know what categories of personal information FTX US has collected about them and whether FTX US disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information below:

Category of Personal Information Collected by FTX US	Category of Third Parties Information is Disclosed to for a Business Purpose
Identifiers. A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, user name, Social Security number, or other similar identifiers.	<ul style="list-style-type: none">• Internet service providers• Data analytics providers• Government entities• Operating systems and platforms• Blockchain networks• Social networks• Service providers• Other users• NFT Partners• Affiliates
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education,	<ul style="list-style-type: none">• Government entities• Service providers• NFT Partners• Affiliates

Category of Personal Information Collected by FTX US	Category of Third Parties Information is Disclosed to for a Business Purpose
employment, employment history, bank account number, credit card number, debit card number, or any other financial information. Personal Information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records. Note: Some personal information included in this category may overlap with other categories.	
Commercial information Transactions, transaction history, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • Service providers • Blockchain networks • NFT Partners • Other users • Affiliates
Internet or other electronic network activity Browsing history, search history, information on a consumer's interaction with an internet website, application, or advertisement.	<ul style="list-style-type: none"> • Advertising partners • Data analytics providers • Service providers • Affiliates

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth in “[Personal Information We Collect](#)” and “[How We Use Your Personal Information](#)” above, respectively.

Right to Know About Personal Information

You have the right to request that we disclose certain information to you about our collection, disclosure, sale and use of your personal information. Once we receive and verify your request, we will disclose to you the following (to the extent applicable to your request):

- The specific pieces of personal information we collected about you in the preceding twelve (12) months;
- The categories of personal information that we have collected about you in the preceding 12 months;
- Categories of personal information that we disclosed or sold for a business purpose in the preceding 12 months;
- The categories of sources from which we have collected this personal information,
- The commercial or business reason(s) for having collected, used, disclosed, or sold that personal information; and
- The categories of third parties to whom we have disclosed or sold your personal information in the preceding 12 months.

You may exercise this right up to two times in any 12-month period.

Right to Request Deletion

You may also have the right to request deletion of your personal information. We will honor such request, but might not be able to fulfill your request if we (or our service providers) are required to retain your personal information. Examples of such exceptions are:

- Completing a transaction or performing a contract we have with you;

- Detecting and addressing data security incidents, and repairing or upkeep of our IT systems;
- Protecting against fraud or other illegal activity;
- Complying with applicable law or a legal obligation, or to exercise rights under the law (e.g. the right to free speech); or
- Using your Personal Information internally to improve our Services.

Disclosures of Personal Information under the CCPA

FTX US does not sell your personal information and has not done so over the last 12 months. However, if you elect to do so, we may disclose your information to our partners. To the extent that such disclosure is, for legal purposes, deemed to be a “sale” under the CCPA, you may opt-out of having your information disclosed by not opting in to disclose your information, disabling third-party cookies on your device, or by contacting us as set forth in “[Contact Us](#)” below.

Opt-out. California residents may opt-out of the disclosure of their personal information to our partners by contacting us as set forth in “[Contact Us](#)” below.

Additional Privacy Rights for California Residents

Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA. We will not (i) deny you products or services, (ii) charge you different prices or rates for products or services, including through granting discounts or other benefits, or imposing penalties, (iii) provide you a different level or quality of products or services, and (iv) suggest that you may receive a different price or rate for products or services or a different level or quality of products or services.

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, please contact us as set forth in “[Contact Us](#)” below and provide written authorization signed by you and your designated agent.

Verification. To protect your privacy, we will take steps to verify your identity before fulfilling your request. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include asking you to answer questions regarding your account and use of our Services. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information related to you. Making a verifiable consumer request does not require you to create an account with us.

We may charge a reasonable fee to process or respond to your verifiable consumer requests if they are excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for this decision and provide you with a cost estimate before completing your request.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in “[Contact Us](#)” below. We will process such requests in accordance with applicable laws.

Accessibility. This Privacy Policy uses industry-standard technologies and was developed in line with the World Wide Web Consortium’s Web Content Accessibility Guidelines, version 2.1. If you wish to print this Privacy Policy, please do so from your web browser or by saving the page as a PDF.

10. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties. You can exercise this right by contacting us at privacy@ftx.us with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth below.

11. CHILDREN’S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in “[Contact Us](#)” below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child’s account if applicable.

12. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Supervisory Authority. If you are located in the European Economic Area, Switzerland, the United Kingdom or Brazil, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

Changes to our Privacy Policy. We may revise this Privacy Policy from time to time in our sole discretion, and will post changes on the Services as soon as they go into effect. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

13. CONTACT US

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at:

West Realm Shires Inc.
Address: 2000 Center Street, Ste 400
Berkeley, CA 94704
Attn: Legal

Email: privacy@ftx.us