

# MineYes Algorithm Privacy Policy

*Effective Date: January 5, 2025*

MineYes respects and protects the privacy of all our users. This Privacy Policy ("Policy") applies to users worldwide who access our services through the MineYes mobile application (App) or the MineYes website. We want to explain clearly how we collect, use, store, and share your personal data, as well as the rights you have regarding your information. Please read this Policy carefully before using the MineYes platform. If you have any questions about its content, you can contact us at any time through the provided channels.

By using MineYes services, you agree that we may collect, process, and protect your personal information in accordance with this Policy. We are committed to using appropriate security measures to safeguard your data and protect your privacy rights.

## 1. Scope of Application

This Policy applies to all international users who register for, log into, or use the MineYes platform services, whether through our mobile app or via our web interface. "MineYes platform services" refers to all the products, features, and related services we offer. Please note that if we provide specific privacy terms in certain countries or regions, this Policy will apply together with those local terms to the extent allowed by law.

MineYes is primarily a platform for adult users. If you are under the age of majority as defined by the laws in your jurisdiction, you should only use MineYes under the consent and guidance of your parent or legal guardian, and you should avoid providing personal information. We do not knowingly collect personal data from minors without appropriate consent. If we discover that a minor has provided personal information without guardian consent, we will promptly delete that data.

## 2. Data We Collect

We only collect information that is necessary and lawful for providing and improving our services. During your use of MineYes, we may collect various types of information related to your usage of the platform, including but not limited to the following:

- **Identity Verification Information (KYC):** To comply with anti-money laundering (AML) and other legal requirements and to secure your account, we may collect personal details during identity verification. This can include your name, date of birth, nationality, government-issued identification number (such as an ID card or passport), copies of identification documents, proof of address, and your photograph or video for facial

verification. This information is used strictly for Know-Your-Customer (KYC) identity authentication purposes.

- **Account and Contact Information:** When you register or use MineYes, we may collect information related to your account and contact details, such as your email address, phone number, username, and any other contact information you provide. This data is used to create and manage your account, communicate with you, and enable your access to our services.
- **Wallet and Transaction Information:** Because MineYes involves digital asset services, we collect information related to your cryptocurrency wallet and transaction activities on our platform. For example, we gather wallet addresses you link or use, public keys, on-chain transaction records (including timestamps, amounts, and types of digital assets transferred), and relevant metadata about those transactions. We may also record other transaction activity on our platform (such as deposits, withdrawals, exchanges, or transfers) to execute your requests and for risk monitoring.
- **Device Identifiers and Technical Information:** When you access MineYes via the mobile app or website, we automatically collect certain technical information about your device to ensure the service works correctly. This may include your device model, unique device identifiers (e.g. device ID or IMEI), operating system and version, browser type, IP address, device language, and time zone settings. We might also collect app version information, crash logs, and system activity details to help diagnose problems and improve service stability.
- **Usage Behavior and Access Logs:** We record data about how you interact with MineYes and log your activities. For example, we may log the times you log in and out, your login IP address and an inferred general location from that IP, the pages or features you click on or view, and other usage logs and actions. This information helps us understand how the product is used, optimize user experience, and perform security audits and detect unusual behavior.
- **Cookies and Similar Technologies:** When you use the MineYes website (or sometimes within the app), we may use cookies and similar tracking technologies (like web beacons or pixels) to automatically collect certain information. This can include your preferences, browsing activities, page response times, and other technical data. For details, see the "Cookies and Tracking Technologies" section below.

Please note: We collect the above information mainly to fulfill the purposes described in this Policy, and we follow the principle of data minimization – collecting only what is necessary for the services. If you choose not to provide certain information, you may not be able to use specific features of the platform, but this will not affect your use of other core functions of

MineYes. For any additional personal information that we need to collect in particular circumstances, we will first ask for your consent before collection.

### 3. Why We Collect Your Data (How We Use It)

We use your information only for the purposes permitted by law and as outlined in this Policy. Your personal data may be used in the following ways:

- **Identity Verification & Compliance:** We use the KYC information you provide to verify your identity for account registration approval, login security checks, and to comply with regulations such as anti-money laundering (AML) and counter-terrorism financing laws. This helps ensure that only legitimate users can access our services and allows us to fulfill our legal obligations in different jurisdictions.
- **Transaction Processing & Risk Control:** We use your wallet addresses, transaction details, and related information to process the transactions you initiate on MineYes (for example, digital asset transfers, swaps, or participation in DAO governance votes). At the same time, this data is utilized for transaction risk management and security monitoring, including identifying unusual transactions, detecting fraud or suspicious activities, and assessing the risk level of your account. These measures protect the security of your assets and maintain the safety of our platform.
- **Security and Account Protection:** To safeguard your account and our platform's security, we analyze collected data for potential threats. For instance, we might use device identifiers and access logs to detect malicious login attempts or unusual access patterns, and then take protective actions (such as multi-factor authentication prompts or login alerts). We also use relevant data to prevent spam, cyber-attacks, or other threats, maintaining the integrity of our systems and keeping your account secure.
- **Personalized Services and Optimization:** We may use your activity records and preferences to personalize your experience on MineYes. For example, based on your transaction history and usage habits, we might recommend digital asset projects, content, or community events that could interest you. This personalization is intended to improve service relevance and user experience, and it will not be used to make automated decisions that have legal or significant effects on you without your explicit consent. You have the right to opt out of personalized recommendations at any time via your account settings or by contacting us.
- **DAO Governance Participation:** If MineYes offers decentralized autonomous organization (DAO) governance features, we may use your information to support your participation in community governance. For example, based on your token holdings or verified identity, we might confirm your eligibility to vote in the DAO and record or display your proposals or voting activity. These uses of data ensure DAO governance is fair and transparent, and they might also be used for governance-related rewards or reputation

systems.

- **Customer Support and Communication:** When you contact us through customer support channels, we will use relevant information from your account and your communication to help address your inquiries, resolve issues, or handle complaints. We also use your contact information (such as email or phone number) to send you important notices and service-related communications, including service changes, transaction alerts, security verification codes, and policy updates. We will only send you marketing or promotional messages if you have given us your consent, and you have the right to unsubscribe from those at any time.
- **Analytics and Product Improvement:** We aggregate and anonymize the data we collect (such as usage logs and device information) to analyze product performance and user behavior patterns in order to improve MineYes's features and service quality. For example, we might track how frequently certain features are used or analyze usage trends across different regions to optimize our product design and make informed business decisions. Unless we have your explicit permission, any data used for analytics or research purposes is in a form that does not personally identify you.
- **Legal Compliance and Protection of Rights:** When required, we may use your information to fulfill legal obligations or protect important interests. For example, we might provide relevant data in response to lawful requests by courts or regulatory authorities, or use necessary information as evidence when handling legal disputes. We may also use or share information to take action if we determine that you may have violated our terms or could be involved in activities that harm others, public safety, or the public interest, but we will only do so in accordance with applicable laws.

If we ever need to use your personal information for a purpose beyond what is listed above, we will seek your consent in advance or ensure we have another lawful basis as required. We will not use your personal data for purposes unrelated to those described in this Policy, and we will never provide your personal information to third parties for their own marketing purposes without your consent. We value transparency, and we will keep you informed about how your data is being used.

## 4. How We Share Your Data

In providing the MineYes services, we may need to share some of your personal data with third parties in certain situations. We only share your information in accordance with the law and after implementing necessary security and confidentiality measures. The main scenarios where we might share data with third parties include:

- **Identity Verification Partners:** To complete your KYC identity verification, we may share the identity information and documents you submit with third-party identity

verification service providers that we have vetted. These partners verify the authenticity of your documents and identity (for example, checking if an ID is valid) and provide us with the verification results. We have strict data processing agreements in place with such providers, requiring them to use your information solely for verification purposes and to protect your data.

- **Payment and Transaction Partners:** If you conduct fiat currency transactions (such as purchasing digital assets with traditional money) or other payment-related activities through MineYes, we might need to share certain information with banks, payment gateways, or transaction facilitators. For example, when you use a fiat payment method, we may need to share some identity or payment details with the payment processor or bank; and when executing on-chain transactions, we interact with blockchain networks by transmitting your wallet address and transaction data. These partners will only receive the information necessary to perform their services, and they are not permitted to use it for any other purpose.
- **Data Hosting and Cloud Service Providers:** We store user data on trusted third-party infrastructure (such as cloud servers or database hosting services). These cloud service providers might technically have access to stored user information, but we use encryption and other safeguards so they cannot directly identify individual data. We also sign confidentiality agreements with all such providers, requiring them to protect your data to the same standards that we uphold. Your data is typically stored on servers in our primary operating regions, but in some cases it may be transferred or backed up to other countries. When we transfer data across borders, we ensure it is done in compliance with relevant data protection laws (for example, by using approved contractual clauses or other appropriate safeguards).
- **Analytics and Communication Services:** To improve our product and provide notifications, we may use third-party analytics tools and communication services. For instance, we might use a third-party analytics platform to understand overall user behavior trends, or employ third-party SMS/email services to send verification codes and important alerts. In these cases, we might share data like your device identifier, usage statistics, or contact information with the service provider. However, we will provide data in a de-identified or aggregated form whenever possible, and we contractually prohibit these service providers from using the data for any purpose other than to provide services to us.
- **Third-Party Plugins and Integrations:** MineYes may interact with third-party wallet plugins or decentralized applications (DApps) at your request. When you choose to use these external services through our platform, MineYes might need to exchange certain information with them to fulfill your request. For example, if you use a browser wallet plugin to log in to MineYes, our platform will receive your wallet address and send necessary transaction information to the plugin; or if you connect to a third-party DApp via MineYes, we will share the needed data (such as your wallet account address, public

key, or authorization token) with that DApp as directed by you. Please note, these third-party services are chosen by you, and your information will be handled according to the third party's own privacy policy, not this one. We will only interact with external applications with your consent or at your direction, and we only share the data needed to carry out your intended action.

- **Legal Requirements and Protection of Rights:** We may disclose your personal information to government authorities or law enforcement agencies when required by law, or when necessary to protect the rights, safety, or property of MineYes, our users, or others. For example, we might share user transaction data to satisfy tax reporting or regulatory requirements, or provide specific account information in response to a lawful court order or subpoena. In any scenario where we must share your information for legal reasons, we will review the request to ensure it is legitimate and will only disclose the minimum amount of information necessary.

We promise that aside from the situations described above, we will not share, sell, or rent your personal information to any third party for their marketing purposes without your explicit consent. Before sharing data with any third-party partner, we will have a confidentiality or data protection agreement in place to ensure they handle your personal data according to our instructions, this Policy, and applicable law. We also make reasonable efforts to ensure third parties only access your information on a need-to-know basis to perform their tasks, and we monitor their activities for compliance.

Please understand that if you access a third-party service through MineYes (for example, by clicking an external link or using a third-party DApp via our platform), your information will be subject to that third party's privacy policy, not ours. We recommend you review the privacy terms of any third-party service before using it.

## 5. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to enhance your user experience and ensure our services function securely and properly. Cookies are small text files stored on your browser or device when you visit a website, often containing an identifier and site name. MineYes uses cookies and similar technologies in the following ways:

- **Authentication and Functionality:** We use cookies to remember your login status and preferences. For example, after you log in to the MineYes web platform, cookies help us recognize your account so you do not have to log in repeatedly, and they keep your session active. Cookies also store your chosen settings (like language preferences) to provide a consistent experience when you return. Without these cookies, some features of our website may not function correctly.

- **Performance and Analytics:** We use cookies and third-party analytics tools (which may utilize web beacons or pixel tags) to collect aggregated information about how users interact with our site. For instance, we learn which pages have high traffic, how long users stay on a page, and which buttons or links are clicked. This information helps us analyze website performance and identify areas for improvement so we can optimize our services. The data collected for analytics is generally aggregated and anonymous, and it is not used to identify you personally.
- **Advertising and Recommendations:** Currently, MineYes does not use third-party advertising cookies to deliver targeted ads. If in the future we decide to implement personalized advertising or cross-site recommendation features, we will do so only after obtaining your consent. Even if we introduce such cookies, you will have the ability to refuse them, thereby limiting targeted advertising. (As of now, any content recommendations we provide are based solely on your activity within MineYes and your preferences, and you can opt out of these personalized features as noted above.)
- **Security:** Certain cookies are essential for security purposes. For example, we may set cookies to help prevent cross-site request forgery (CSRF) attacks or to detect abnormal login attempts. These cookies allow us to distinguish legitimate visits from malicious activity, thereby increasing the security of our platform and protecting your account.

**Your Choices:** You have the right to accept or refuse cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to refuse cookies, you can still use MineYes services, but some features enhanced by cookies (for example, keeping you logged in) might not work properly. You can also delete cookies stored in your browser at any time. For mobile applications, you can reset your device's advertising identifier or disable certain tracking features by adjusting your device settings (for instance, you can turn off location access to prevent location tracking).

Additionally, where applicable, our website will display a cookie consent banner or provide a privacy preference center, giving you control over which types of cookies you accept. Please note that certain cookies which are necessary for security and basic functionality of the site cannot be turned off, because our service cannot run properly without them. Any information collected via cookies and similar technologies is used for the purposes described in this Policy and is protected with the same level of care as other personal data.

## 6. Your Rights

MineYes fully respects and protects the rights you have over your personal data. Under applicable data protection laws (such as the EU General Data Protection Regulation (GDPR) and similar laws), you may exercise the following rights regarding your personal information:

- **Right of Access:** You have the right to ask whether we are processing your personal data and to request a copy of the information we hold about you. This allows you to know what data we have collected about you, how we use it, and with whom it has been shared, among other details.
- **Right to Rectification:** If you find that any personal information we have about you is incorrect or incomplete, you have the right to request that we correct or update it. We will verify the information and promptly make corrections to ensure your data is accurate and up to date.
- **Right to Deletion (Erasure):** In certain circumstances, you can request that we delete your personal data. For example, if the data is no longer necessary for the purposes it was collected for, or if you withdraw your consent and we have no other legal basis for keeping it, you may ask us to delete it. We will respond to your deletion request within the timeframe required by law and delete the relevant data if the request meets the legal conditions. Please understand that sometimes we may not be able to fulfill a deletion request immediately due to legal obligations or other legitimate reasons – for instance, we might be required by law to retain certain transaction records for a set period (such as under anti-money laundering regulations). If we must deny a deletion request, we will inform you of the reason.
- **Right to Restrict Processing:** You have the right to request that we limit the processing of some of your personal information, either temporarily or permanently. When processing is restricted, we will continue to store your data but will not use it for other purposes until the restriction is lifted. You might exercise this right if, for example, you contest the accuracy of your data (for the period while we verify it) or if you object to processing and we are evaluating your request. We will notify you before any such restriction is lifted.
- **Right to Data Portability:** For information that you have provided to us, you have the right (where legally applicable) to obtain that data in a structured, commonly used, machine-readable format, and you have the right to transfer it to another service provider (or to have us transfer it for you where technically feasible). For example, you could request a copy of your account data to use in another service.
- **Right to Withdraw Consent:** If we are processing any of your personal information based on your consent, you have the right to withdraw that consent at any time. Once you withdraw consent, we will stop processing the relevant data. However, withdrawing consent does not affect the lawfulness of any processing we conducted prior to your withdrawal. We will also inform you if withdrawing consent means you will no longer be able to use certain services (so you can decide whether to proceed with the withdrawal).

In addition to the rights above, depending on your country or region, you might have additional rights. For example, in some jurisdictions you have the right to object to the use of your personal information for direct marketing, or to object to decisions being made about you based solely on automated processing (when those decisions have significant effects on you). MineYes will respect all applicable laws and the rights they grant to you, and we will do our best to help you exercise those rights.

**Exercising Your Rights:** You can exercise your rights by contacting us through customer support or by sending an email to our dedicated privacy address at [privacy@mineyes.com](mailto:privacy@mineyes.com). To protect your account security, we may require you to provide certain information to verify your identity before processing your request. Once we receive your request and verify your identity, we will respond within a reasonable time. In general, we aim to reply within 30 days of receiving a valid request. If your request is complex or if we have received numerous requests, we may need more time to respond, but we will inform you of any extension and the reason for it.

Please note that in some cases we may decline requests that are excessive or manifestly unfounded according to law – for example, if a request is unreasonably repetitive, risks the privacy of others, or is for data that cannot be connected to you. If we refuse a request, we will explain our reasons. Furthermore, if you are not satisfied with how we have handled your request or believe we have infringed your rights, you have the right to complain to a relevant data protection authority or seek judicial remedy. We encourage you to reach out to us first so we have the opportunity to address your concerns, and we will do our utmost to resolve any issues and protect your rights.

## 7. Data Storage and Security

We take the security of your personal information very seriously and implement a variety of measures to ensure your data is protected. Below is an overview of how we store and secure your information:

**Data Storage Location and International Transfers:** The personal data you provide or generate through MineYes is stored on secure servers with robust safeguards. We primarily store data in data centers located in the regions where we operate (for example, in the United States, the European Union, or other regions relevant to our user base) to allow for quick response to users. However, since our services are available globally, your data might be transferred to, or backed up in, countries outside your own. When we transfer personal data across national borders, we do so in accordance with applicable laws – for instance, we ensure the receiving country or region has an adequate level of data protection, or we implement approved contractual clauses or other appropriate safeguards for the transfer. We will retain your personal information only for as long as necessary to fulfill the purposes outlined in this Policy and as required by law. Once those purposes have been fulfilled, and after any required retention period has passed, we will delete or anonymize your personal data. For example, generally your account information will be deleted or anonymized after you delete your account; however, if certain data must be kept to comply with legal obligations (like financial records for

auditing or anti-money laundering regulations), we will store that data securely for the legally required period and then delete it.

**Encryption and Security Measures:** We use industry-standard security technologies to protect your personal data. When data is transmitted between your device and our servers, we employ encryption protocols such as SSL/TLS to prevent eavesdropping or tampering. For sensitive information that we store (for example, identification documents or passwords), we apply encryption or hashing to protect it from unauthorized access. Additionally, for highly sensitive data like your wallet private keys, our policy is not to collect them at all; if it is necessary to handle them, we will only store an encrypted form or a cryptographic digest, minimizing the risk to your privacy. These encryption and pseudonymization practices add extra layers of security to safeguard your data.

**Access Controls and Internal Management:** We have strict access control mechanisms to ensure that only authorized personnel can access your personal information, and even then only on a need-to-know basis. Our employees are allowed to access user data solely when required to perform their duties (for example, to assist you with a support request), and such access is granted through a permission approval process. All staff with potential access to personal data are bound by confidentiality obligations and receive regular training on data privacy and security. We have also established internal policies and an incident response plan for data protection. If an unlikely data breach or security incident occurs, these procedures help us respond quickly to minimize impact.

**Security Audits and Protections:** MineYes regularly evaluates and tests our systems to detect and address potential vulnerabilities. We conduct security audits, routine vulnerability scans, and periodic penetration testing to find and fix any weaknesses in our infrastructure. We also deploy multiple layers of defense including firewalls, intrusion detection systems, and anti-virus/anti-malware tools to guard against cyber attacks. Sensitive operations in our platform are protected with additional verification steps (for example, we send login alerts and require two-factor authentication or secondary confirmation for critical actions like withdrawals) to prevent unauthorized use of your account. We also encourage you as a user to take precautions to protect your own account – for instance, use a strong and unique password, enable two-factor authentication (2FA) if available, and keep your login credentials confidential.

Despite our best efforts to protect your data with high standards of security, please understand that no method of transmission over the internet or electronic storage is completely infallible. In the event of an unexpected security breach that affects your personal information, we will follow applicable laws regarding notification: we will inform affected users and the relevant authorities as required, and we will take all necessary steps to mitigate the issue and prevent future occurrences.

Through the measures outlined above, MineYes is committed to protecting your personal information on both technical and organizational levels. We continuously update and enhance our security practices to handle new threats and challenges, striving to minimize the risk of any unauthorized access, disclosure, or misuse of your data.

## 8. Changes to This Privacy Policy

As MineYes grows and our services evolve, or as laws and regulations change, we may update this Privacy Policy from time to time. We will do this to ensure our practices remain consistent with our business operations and legal obligations. Key situations that may trigger an update include changes in how we process data, the introduction of new products or services that involve new uses of data, or changes in applicable privacy laws.

**Update Process:** If we make significant changes to this Policy (for example, changing how we collect or use data, altering the types of data we share, or modifying your rights or our obligations in a substantial way), we will notify you in a clear and timely manner before the changes take effect. Notification methods may include prominent alerts on our website or within the app (such as a pop-up or banner), sending you an email or text message informing you of the updated Policy, or other appropriate means. For minor adjustments that do not materially impact your rights (such as wording changes or improvements to organization), we may simply post the revised Policy on the website with an updated effective date. You can always see when this Policy was last revised by checking the "Effective Date" at the top.

**User Consent and Continued Use:** If an update to the Policy significantly affects how we handle your data or your rights, we will seek your explicit consent to the new terms where required by law. For example, if we plan to use your personal data for a new purpose not originally listed, we will ask for your agreement before doing so. We will continue to protect any previously collected information according to the Privacy Policy that was in effect at the time it was collected. Once a new version of the Policy takes effect, if you continue to use MineYes services, it will indicate acceptance of the updated Policy. If you do not agree with the changes in a new Policy, you have the right to stop using MineYes services, and you may contact us to request account deletion and data removal (unless otherwise required by law).

**Notice Channels:** We will use the contact information you have provided (for example, sending an email or in-app notification) or public announcements on our platform to inform you of any important updates to this Policy. To ensure you receive these notices, please keep your contact details (email, phone number, etc.) up to date in your account settings. If you do not frequently log in, rest assured that the latest Privacy Policy will always be available on our official website for you to review. We encourage you to check the Privacy Policy periodically to stay informed about how we protect your information.

Any changes to this Privacy Policy will comply with applicable privacy regulations and will be made with your privacy rights in mind. We will not reduce your rights under this Policy without your consent or without required notification. We will also maintain archives of previous versions of this Policy (when required or appropriate) so that you can reference them. Your trust is extremely important to us, and we will continue to be transparent about our privacy practices and remain committed to safeguarding your personal information.

## 9. Dispute Resolution and Applicable Law

MineYes collects and processes personal information in accordance with the data protection laws of the jurisdictions in which we operate and where our users reside. This Policy will be interpreted and applied in a way that complies with those data protection laws. If privacy laws differ between regions, we will follow the laws that provide the highest level of protection for the individual user.

This Privacy Policy and any disputes related to it are governed by the laws of the jurisdiction where our company is officially registered, except as otherwise required by applicable law. In the event of a dispute or claim arising from this Privacy Policy, we recommend the following resolution process:

1. **Contact Us to Resolve Amicably:** We encourage you to first contact our customer support or our designated privacy team (via [privacy@mineyes.com](mailto:privacy@mineyes.com)) with any concerns or complaints. We will promptly investigate and do our best to resolve the issue in a friendly and efficient manner. Our goal is to address your concerns to your satisfaction through cooperation and communication.
2. **Formal Dispute Resolution:** If we are unable to resolve a dispute through direct communication, you have the right to seek resolution through formal means. Unless otherwise required by applicable law, any legal proceedings related to this Privacy Policy or the use of your data should be brought before a competent court in the jurisdiction of our company's primary place of business. We will comply with the final judgment or order of the courts or other dispute resolution bodies.
3. **Regulatory and Legal Remedies:** For users in certain regions, you may also have the right to escalate privacy concerns to a regulatory authority. For example, if you are in the European Union, you have the right to file a complaint with your local data protection supervisory authority about our data practices. Similarly, users in other jurisdictions may have the right to contact their local data protection regulator or authority. We respect the rights of our users to seek help from these regulators and will cooperate fully with any official investigation or resolution process.

We want to emphasize that protecting your privacy and rights is of utmost importance to MineYes. We have established a dedicated contact channel (such as [privacy@mineyes.com](mailto:privacy@mineyes.com)) for handling privacy-related issues, and we will make every reasonable effort to address and resolve your concerns. In all cases, we will handle your personal information in accordance with this Privacy Policy and applicable law, and we welcome the oversight of users and authorities alike. Your trust is the foundation of our service, and we will strive to resolve any privacy-related disputes in a fair and effective manner, upholding your rights at every step.

Thank you for taking the time to read our Privacy Policy. We understand how important your personal information is to you, and we will continue to improve and strictly enforce the measures described in this Policy to protect your privacy. If you have any questions or require any further

information about this Policy, please feel free to contact us. We hope you enjoy a safe and secure experience with MineYes!