

# Pharos Privacy Policy

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Last updated [INSERT].

Pharos Network Technology Limited. and our subsidiaries and affiliates (“**Pharos**,” “**we**,” “**us**” or “**our**”) provides an EVM-compatible blockchain platform. This Privacy Policy describes how Pharos processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including as applicable, our website and social media pages) as well as our marketing activities, live events and other activities described in this Privacy Policy (collectively, the “**Service**”). Pharos may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information.

**NOTICE TO EUROPEAN USERS:** Please see the [Notice to European users](#) section for additional information for individuals located in the European Economic Area (which we refer to as “**Europe**” and “**European**” should be understood accordingly) below.

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## Personal information we collect

**Information you provide to us or that we generate about you.** Personal information you may provide to us through the Service or otherwise or that we may generate about you includes:

- **Contact data**, such as your first and last name, salutation, email address, billing and mailing addresses and phone number.
- **Demographic data**, such as your city, state, country of residence, postal code and age.
- **Profile data**, such as the username and password that you may set to establish an online account on the Service, referral code, links to your profiles on social networks and any other information that you add to your account profile.
- **Communications data** based on our exchanges with you, including when you contact us through Discord, the Service, communicate with us via chat features, social media or otherwise.

- **Transactional data**, such as information relating to or needed to complete your orders on or through the Service, including order numbers and transaction history.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Blockchain activity data**, such as information relating to or needed to complete your cryptocurrency transactions on or through the Service (including wallet address, transaction number, transaction sender and recipient, transaction amount and transaction history), as well as information relating to other on-chain activity associated with your publicly available wallet address, such as applications you have interacted with on the blockchain.
- **Cryptocurrency data**, such as your virtual currency or wallet account balances and other associated information.
- **Promotion data**, including information you share when you enter a competition, promotion or complete a survey. Please note that if you participate in a sweepstakes, contest or giveaway through the Service, we may ask you for your contact data to notify you if you win or not, to verify your identity, determine your eligibility and/or to send you prizes. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and contests are voluntary. We recommend that you read the rules and other relevant information for each sweepstakes and contest that you enter.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third-party sources.** We may combine personal information we receive from you with personal information falling within one of the categories identified above that we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, public blockchains and other publicly available sources.
- **Data providers**, such as information services and data licensors.
- **Partners**, such marketing partners and event co-sponsors.
- **Service providers** that provide services on our behalf or help us operate the Service or our business.
- **Business transaction partners.** We may receive personal information in connection with an actual or prospective business transaction. For example, we may receive your personal information from an entity we acquire or are acquired by, a successor or assignee or any party involved in a business transaction such as a merger, acquisition, sale of assets or similar transaction, and/or in the context of an insolvency, bankruptcy or receivership.
- **Third-party linked services** that you use to log into, or otherwise link to, your Service account. This data may include your username, profile picture and other information associated with your account on that third-party service that is made available to us based on your account settings on that service.

**Automatic data collection.** We, our service providers and our business partners may automatically log information about you, your computer or mobile device and your interaction

over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G) and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, app launches, access times and duration of access and whether you have opened our emails or clicked links within them.
- **Communication interaction data** such as your interactions with our email, text or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

**Data about others.** We may offer features that help users invite their friends or contacts to use the Service, and we may collect contact details about these invitees so we can deliver their invitations. Please do not refer someone to us or share their contact details with us unless you have their permission to do so.

## How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery and operations.** We may use your personal information to:

- provide the Service and operate our business;
- enable security features of the Service;
- establish and maintain your user profile on the Service;
- facilitate your invitations to friends or contacts who you want to invite to join the Service;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts and support and administrative messages;
- communicate with you about events or contests in which you participate; and
- provide support for the Service and respond to your requests, questions and feedback.

**Service personalization**, which may include using your personal information to:

- understand your needs and interests;
- personalize your experience with the Service and our Service-related communications; and
- remember your selections and preferences as you navigate webpages.

**Service improvement and analytics.** We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails and to develop new products and services.

**Marketing and advertising.** We, our service providers, and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes.

- **Direct marketing.** We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.

**Events, promotions and contests.** We may use your personal information to:

- administer promotions and contests
- communicate with you about promotions or contests in which you participate
- contact or market to you after collecting your personal information at an event

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**Data sharing in the context of corporate events,** we may share certain personal information in the context of actual or prospective corporate events – for more information, see [How we share your personal information](#), below.

**To create aggregated, de-identified and/or anonymized data.** We may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

**Further uses,** in some cases, we may use your personal information for further uses, in which case we will ask for your consent to use of your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

## Retention

We generally retain personal information to fulfill the purposes for which we collected it,

including for the purposes of satisfying any legal, accounting or reporting requirements, to establish or defend legal claims or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it, anonymize it or isolate it from further processing.

## How we share your personal information

We may share your personal information with the following parties (or as otherwise described in this Privacy Policy, in other applicable notices or at the time of collection).

**Affiliates.** Our corporate parent, subsidiaries and affiliates.

**Service providers.** Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, marketing, consumer research and website analytics).

**Third parties designated by you.** We may share your personal information with third parties where you have instructed us or provided your consent to do so.

**Partners.** Third parties with whom we partner, including parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services or whose products or services may be of interest to you.

**Linked third-party services.** If you log into the Service with, or otherwise link your Service account to, a social media or other third-party service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities and private parties, as we believe in good faith to be necessary or appropriate for the [Compliance and protection purposes](#) described above.

**Business transferees.** We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in or financings of Pharos, public stock offerings or the sale, transfer or merger of all or part of our business, assets or shares). For example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Pharos as part of any merger, acquisition, sale of assets or similar transaction, and/or in the event of an insolvency, bankruptcy or receivership in which personal information is transferred to one or more third parties as one of our business assets.

**Other users and the public.** Additionally, due to the nature of blockchain technologies, any data posted to a blockchain will be visible to other users of the Service and the public. This data can be seen, collected and used by others, including being cached, copied, screen captured or stored elsewhere by others (e.g., search engines), and we are not responsible for

any such use of this information.

## Your choices

In this section, we describe the choices available to all users. Users who are located in Europe can find information about their rights, as applicable, below.

**Access or update your information.** If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

**Opt-out of communications.** You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

**Blocking images/clear gifs:** Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

**Linked third-party services.** If you choose to connect to the Service through your social media account or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

**Delete your content or close your account.** You can choose to delete certain content through your account. If you wish to request to close your account, please [contact us](#).

## Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

## Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

## International data transfer

We are headquartered in the British Virgin Islands and may use service providers that operate in other countries. Your personal information may be transferred to the British Virgin Islands or other locations where privacy laws may not be as protective as those in your state, province, or country.

## Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

## Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

## How to contact us

If you have questions about our personal information practices or you would like to exercise rights in relation to your personal information that may be available to you depending on applicable law, please contact us.

Email: [privacy@pharoslabs.xyz](mailto:privacy@pharoslabs.xyz)

## Notice to European users

### 1. General

**Where this Notice to European users applies.** The information provided in this "Notice to European users" section applies only to individuals in the European Economic Area (i.e., "**Europe**" as defined at the top of this Privacy Policy). References to "personal information" in this Privacy Policy to European Users should be understood to include a reference to "personal data" (as defined in the GDPR) – i.e., information about individuals from they are either directly identified or can be identified.

**Controller.** Pharos Network Technology Limited. is the controller in respect of the processing of your personal information covered by this Privacy Policy for purposes of European data protection legislation ("**GDPR**"). See the 'How to contact us' section above for our contact details.

## 2. Our legal bases for processing

In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a “legal basis” for that use. Our legal bases for processing your personal information described in this Privacy Policy to European Users are listed below:

- Where we need to perform a contract, we are about to enter into or have entered into with you (“**Contractual Necessity**”).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”).

More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information for is set out below.

- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the Purpose in question (“**Consent**”).

We have set out below the legal bases we rely on in respect of the relevant Purposes for which we use your personal information – for more information on these Purposes and the data types involved, see ‘How we use your personal information’:

### **Purpose: Service delivery and operations**

- Categories of personal information involved:
  - Contact data
  - Demographic data
  - Profile data
  - Communications data
  - Transactional data
  - Marketing data
  - Financial data
  - Payment data
  - Blockchain activity data
  - Cryptocurrency data
  - Promotion data
  - Device data
  - Online activity data
  - Communication interaction data
- Legal basis:
  - Contractual Necessity

**Purpose: Research and development**

- Categories of personal information involved:
  - Any and all data types relevant in the circumstances
- Legal basis:
  - Legitimate interest. We have legitimate interest, and believe it is also in your interests, that we are able to take steps to ensure that our Service and how we use Personal Information is as un-privacy intrusive as possible.

**Purpose: Service improvement and analytics**

- Categories of personal information involved:
  - Contact data
  - Demographic data
  - Profile data
  - Communications data
  - Transactional data
  - Marketing data
  - Financial data
  - Payment data
  - Blockchain activity data
  - Cryptocurrency data
  - Promotion data
  - Device data
  - Online activity data
  - Communication interaction data
- Legal basis:
  - Legitimate Interests. We have a legitimate interest in providing you with a good service, which is personalised to you and that remembers your selections and preferences.
  - Consent, in respect of any optional cookies used for this purpose.

**Purpose: Direct marketing**

- Categories of personal information involved:
  - Contact data
  - Demographic data
  - Profile data
  - Communications data
  - Transactional data
  - Marketing data
  - Financial data
  - Payment data
  - Blockchain activity data
  - Cryptocurrency data

- Promotion data
- Device data
- Online activity data
- Communication interaction data
- Legal basis:
  - Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organisation and sending marketing communications for that purpose.
  - Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.

**Purpose: Compliance and protection**

- Categories of personal information involved:
  - Any and all data types relevant in the circumstances
- Legal basis:
  - Compliance with Law.
  - Legitimate interest. Where Compliance with Law is not applicable, we and any relevant third parties have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety.

**Purpose: Further uses**

- Categories of personal information involved:
  - Any and all data types relevant in the circumstances
- Legal basis:
  - The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the Personal Information was collected.
  - Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.

3. Retention

We retain personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for compliance and protection purposes. 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 purposes for which we

process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. When we no longer require the personal information, we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

#### 4. Other information

**No sensitive personal information.** We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services, or otherwise to us. If you provide us with any sensitive personal information to us when you use the Services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Services.

**No Automated Decision-Making and Profiling.** As part of the Service, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects.

#### 5. Your rights

##### **General.**

European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no good reason for us continuing to process it - you also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.

- **Restrict.** Restrict the processing of your personal information, for example if you want us to establish its accuracy or the reason for processing it.
- **Object.** Object to our processing of your personal information where we are relying on Legitimate Interests – you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time.

**Exercising These Rights.** You may submit these requests by email to [privacy@pharoslabs.xyz](mailto:privacy@pharoslabs.xyz). We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions.

### **Your Right to Lodge a Complaint with your Supervisory Authority.**

In addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

For users in the European Economic Area – the contact information for the data protection regulator in your place of residence can be found here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## **6. Data Processing outside Europe**

We are a B.V.I.-based company and many of our service providers, advisers, partners or other recipients of data are also based in the B.V.I. This means that, if you use the Service, your personal information will necessarily be accessed and processed in the B.V.I. It may also be provided to recipients in other countries outside Europe. It is important to note that the B.V.I. is not the subject of an ‘adequacy decision’ under the GDPR – basically, this means that the B.V.I. legal regime is not considered by relevant European bodies to provide an adequate level of protection for personal information, which is equivalent to that provided by relevant European laws. Where we share your personal information with third parties who are based outside Europe, we try to ensure a similar degree of protection is afforded to your personal information.