

ROCKETPLACE PRIVACY POLICY

Last Updated: December 2021

Rocketplace, Inc. (collectively, “Rocketplace”, “we”, “us,” “our”) is committed to protecting individual privacy and maintaining the trust of users of our platform (collectively, “Users”). It is important to us that we provide transparency regarding our collection, use, and disclosure of your Personal Information. This includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. We refer to this information as “Personal Information” throughout this policy.

To help us meet our commitment to you, we have created this Privacy Policy (“Policy”). This Policy governs data protection matters across our platform and services (collectively, the “Platform” or “Services”). This Privacy Policy, along with our Terms of Use, form an integral and binding part of our relationship with you.

1. What Does This Privacy Policy Apply to?

This Policy describes how we use, share, and protect the Personal Information of Users who use our Services. It also describes the rights and choices regarding use, access to, and correction of Personal Information available.

2. What Information Do We Collect and/or Process and Why?

Here is a list of the categories of Personal Information we may collect and process.

Information You Provide Us

We may collect Personal Information from you, when you create your account with us in order to log into our network (“Account”). Such Personal Information includes your username, email address, and geolocation data. We may also collect name, phone number, postal address, government identification numbers (which may include Social Security Number, driver’s license number, passport number), bank account information, and routing number in order to verify your identity and to detect money laundering, terrorist financing, fraud, or any other financial crimes. In addition, Personal information collected is used by Rocketplace to comply with the Bank Secrecy Act and applicable Anti-Money Laundering regulations. This may include commercial information such as trading activity, order activity, deposits, withdrawals, and account balances.

Our Services let you store preferences like how your content is displayed. We may associate these choices with your ID and browser, and you can edit these preferences at any time.

If you provide us feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email, in order to send you a reply.

We may collect usage data from your activity on our Platform including system activity, internal and external information related to Rocketplace pages that you visit, the website(s) you visited before browsing the Platform, how long you spend on a page, and clickstream information. We also collect other types of Personal Information that you provide to us voluntarily, such as your browser type, IP address, unique device identifiers, operating system and version, screen resolution, and other requested information if you contact us via email regarding support for the Services.

In addition, Personal information collected is used by Rocketplace to comply with the Bank Secrecy Act and applicable Anti-Money Laundering regulations. This may include commercial information such as trading activity, order activity, deposits, withdrawals, and account balances.

We may also collect Personal Information at other points on our Platform that explicitly states that Personal Information is being collected from you. Rocketplace will disclose the purposes of collecting your Personal Information accordingly. Rocketplace will only use your Personal Information for the purposes for which it has been collected from you.

3. Information Collected via Technology and Cookies

As you navigate through and interact with our Platform, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns. To make our Service more useful to you, our servers (which may be hosted by a third-party service provider) collect information from you, including your browser type, operating system, Internet Protocol ("IP") address, which may vary from session to session), and/or a date/time stamp for your Account signup/login.

We may use third-party analytics and other tracking mechanisms to track Users. These tracking mechanisms may automatically collect information about your use of the Services.

A cookie is a file containing an identifier that is sent by a web server to a browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may not contain any information that personally identifies a user, but Personal Information that we store about you may be linked to the information stored in and obtained from cookies. To the extent that cookies that are not strictly necessary for the provision of Platform, we will ask you to consent to such use of cookies when you first visit the Platform and use the Services.

We use cookies for the following purposes:

- Session – A session cookie contains information that is stored in a temporary memory location and then subsequently deleted after the session is completed or the web browser is closed. This cookie stores information that the user has inputted and tracks the movements of the user within the Platform. The session cookie will be deleted when the expiration date is reached or when a user or application manually deletes it.

- Strictly Necessary - Strictly Necessary cookies are used to provide an online service (e.g., our Platform or a service on our Platform) which you have requested.
- Performance – These cookies used specifically for gathering data on how Users use the Services, which pages of our website and Platform are visited most often, or if they get error messages on web pages. These cookies only monitor the performance of the platform as Users interact with it. These cookies do not collect your Personal Information, which means all the data collected is anonymous and only used to improve the functionality of the Platform.

One of the third-party services that we use to track your activity and understand your behavior on our Platform is Google Analytics. Information that we collect may be combined with other information about you using Google Analytics or other services. We use these technologies, alone or in combination, to understand user behavior (by tracking unique user IDs), and to target and measure the effectiveness of advertisements, help diagnose problems, and facilitate your access to, and use of, the services offered on our Platform.

You can opt out of receiving interest-based Google ads or customize the ads Google shows you through your Google settings. If you do not want Google Analytics to collect and use information about your use of our platform, then you can adjust your settings in your web browser.

Rocketplace follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and a part of hosting service analytics. The information collected by log files may include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

4. How Do We Use Personal Information?

In general, Personal Information you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your Personal Information in the following ways:

- Provide you with our Services pursuant to the terms of our Terms of Use;
- Facilitate the creation of and secure your Account on our Platform;
- Identify you as a User on our Platform;
- Provide improved administration of our Services;
- Provide you with customer support;
- Improve the quality of experience when you interact with our Services;
- Send you a welcome email to verify ownership of the email address provided when your Account was created;
- Protect you and other users from any conduct that violates the Terms of Use or to prevent abuse or harassment of any other User;
- Protect the security and integrity of our Services;

- Detect and prevent fraud;
- Market our products to you;
- Display your username next to the digital content you create on the Platform;
- Comply with legal and regulatory requirements, such as identity verification;
- Send you administrative email notifications, such as security or support and maintenance advisories; and
- Send you email notifications related to actions on the Platform.

We may create anonymous data records from Personal Information by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyze request and usage patterns so that we may enhance the content of our Services and improve Service navigation. We reserve the right to use anonymous data for any purpose and to disclose Anonymous Data to third parties without restriction.

Subject to applicable laws and regulations, we may from time to time send direct marketing materials promoting services, products, facilities, or activities to you using information collected from or about you. You may opt-out of such communications at any time by contacting us via email at support@rocketplace.com. You may also opt-out of such communications by following the directions provided in any marketing communication. It is our policy to not provide your Personal Information for those third parties' direct marketing purposes without your consent.

5. How Do We Disclose Personal Information?

We will not disclose any Personal Information we collect from you to any third-parties except as indicated below:

- **Service Providers** - We may share your Personal Information with third-party service providers for business or commercial purposes. Your Personal Information may be shared so that they can provide us with services, including identity verification, fraud detection and prevention, security threat detection, payment processing, customer support, data analytics, Information Technology, advertising, marketing, data processing, network infrastructure, storage, transaction monitoring, and tax reporting. We share your Personal Information with these service providers only so that they can provide us with services, and we prohibit our service providers from using or disclosing your Personal Information for any other purpose. Our third-party service providers are subject to strict confidentiality obligations.
- **Affiliates** - We may share your Personal Information with our affiliates, for the purposes outlined above, and as it is necessary to provide you with our Services.
- **Professional Advisors** - We may share your Personal Information with our professional advisors, including legal, accounting, or other consulting services for purposes of audits or to comply with our legal obligations.
- **Law Enforcement and Legal Request** – We may disclose Personal Information to comply with applicable legal and our regulatory monitoring and reporting obligations (which may include laws outside your country of residence), to respond to requests from public and

government authorities (which may include authorities outside your country of residence), to cooperate with law enforcement, or for other legal reasons.

- **Business Transfer** – We may disclose Personal Information to a buyer or successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Rocketplace’s assets, whether as a going concern or as part of bankruptcy, liquidation, receivership, or similar proceeding in which Personal Information held by Rocketplace are among the assets to be transferred.
- **Enforcement of Our or Others’ Rights** – We may disclose Personal Information to the extent they are necessary to enforce or protect our rights, privacy, safety or property, and/or that of our affiliates, you or others, including enforcing our Terms of Use and any other agreements (such as for billing and collection purposes and fraud prevention).
- **Payment and Transaction Processing** – We have partnered with a third-party, Circle, for processing of payments and transactions on our Platform. As such, we may disclose your Personal Information to Circle in connection with the Services and processing of payments and transactions. Please note that Circle processes your Personal Information a processor, on our behalf, and also as a controller in accordance with Circle’s USDC Privacy Policy which is located [here](#).

6. Children

We do not knowingly collect Personal Information from children under the age of sixteen (16). If you believe that we may have collected Personal Information from or about a child under the age of sixteen (16), please contact us at privacy@rocketplace.com.

7. How Do We Protect Your Personal Information?

At Rocketplace we take the protection of your Personal Information seriously. Rocketplace employees who have access to your Personal Information are made aware of the importance of keeping it confidential. We care about the security of the information and use various administrative, and technological safeguards to preserve the integrity and security of all information collected through our platform. Measures we take include encryption of Rocketplace website communications with TLS/SSL; required two-factor authentication for all sessions; periodic review of our Personal Information collection, storage, and processing practices; and restricted access to your Personal Information on a need-to-know basis for our employees, contractors and agents who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

When we rely on service providers that may require access to your Personal Information, we require them to have adequate privacy and security standards. We use contracts and other legally binding measures with our service providers to maintain the confidentiality and security of your Personal Information, and to prevent such information from being used for any other purpose.

However, no data security measures can guarantee complete security; we also depend on you to take common sense steps to ensure your Personal Information remains secure. Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect

your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our platform. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our platform.

8. Information for California Consumers

The information and rights in this section apply specifically to California residents.

Rocketplace does not sell, trade, or rent out our User's Personal Information for compensation, nor have we done so in the preceding 12 months.

California residents are entitled to contact us to request information about whether we have disclosed Personal Information to third parties for the third parties' direct marketing purposes. Currently, Rocketplace does not disclose Personal Information to third parties for direct marketing purposes. Thus, upon receipt of such a request by a California consumer, and as required by California state law, we will either (1) respond with a confirmation that we have not disclosed any Personal Information to third parties in the previous calendar year, or (2) if our practices have changed, we will provide the categories of Personal Information that has been shared in the past 12 months and categories of third parties to whom such Personal Information was disclosed, whichever is relevant.

California consumers have the right to:

- Request disclosure of the categories and specific pieces of Personal Information that Rocketplace has collected about you;
- Request disclosure of the categories of third-party sources, if any, from which Rocketplace has collected Personal Information about you;
- Disclosure of the business or commercial purpose(s) for which your Personal Information has been collected by Rocketplace;
- Receive a list of the categories of third parties with whom Rocketplace has shared your Personal Information;
- Request that Rocketplace delete any Personal Information that it has collected from you (subject to exceptions); and
- Not be discriminated against by Rocketplace (e.g., charged different rates, provided different levels of service, denied goods or services, or suggested any of the preceding) for exercising any of the individual rights granted above.

To exercise any of your rights as a California consumer, you can submit a request to privacy@rocketplace.com.

Before complying with your request, we will need to verify that it is you that is making the request. To accomplish this, you may be requested to (1) confirm specific Personal Information that we already know about you; or (2) provide us with appropriate identification and documentation. California consumers are limited to two requests for Personal Information per 12-month period. Only you or an authorized agent may make a verifiable data subject request related to your Personal Information.

The verifiable data subject request must provide sufficient information and documentation to allow us to verify that you (or an authorized agent) are the person about whom we collected Personal Information. We will not provide you with Personal Information if we cannot verify your identity and/or authority to make the data subject request and confirm the Personal Information belongs to you or the represented individual. Making a verifiable data subject request does not require you to create an account with us. We use Personal Information provided in a verifiable data subject request solely to verify the requestor's identity or authority to make the request.

We will acknowledge receipt of your data request within 10 days. We will respond to a verifiable data subject request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period. If you have an account with us, we will deliver our response to the email address for that account. If you do not have an account with us, we will deliver our response by US mail or electronically at the email address in your request, at your option. All disclosures we provide will only cover the 12-month period preceding the verifiable employee request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable data subject request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

9. Retaining Your Personal Information

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which they were obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you;
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

10. Updates to this Privacy Policy

It is our intent to post any changes we make to our Privacy Policy on this page, with a notice that it has been updated on our main homepage. If we make material changes to how we treat your Personal Information, we will notify you through a notice on the homepage. The date that this Privacy Policy was last revised is listed at the top of the page. You are responsible for visiting our website and this Privacy Policy to check for any changes.

11. Updating Your Information and Contacting Us

If you have any questions or complaints related to our practices with respect to the collection, use, or disclosure of Personal Information, or if you would like to update your information, please contact us by email at support@rocketplace.com or by mail:

Rocketplace
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Palo Alto, CA 94306.